

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE -- REVISED

PERMITTEE

Press-On Tape & Gasket Corporation  
Attn: Steven Atlas  
1020 South Westgate  
Addison, Illinois 60101

Application No.: 99100007

I.D. No.: 043005AMQ

Applicant's Designation:

Date Received: June 1, 2004

Subject: Adhesive Tape Manufacturing

Date Issued: August 20, 2004

Expiration Date: February 24, 2009

Location: 1020 South Westgate, Addison  
21 Factory Road, Addison  
100 Laura Drive, Addison

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Equipment at 1020 South Westgate:

Two Pressure Sensitive Tape Coating Lines controlled by Catalyst Afterburner;  
Hot Melt Coater

Equipment at 21 Factor Road:

Spray Coater

Equipment at 100 Laura Drive:

2 Liquid Coaters

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 25 tons/year, total combined hazardous air pollutants (HAPs) to less than 25 tons/year and single hazardous air pollutant to less than 10 tons/year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.

- 2a. The two coating lines are subject to New Source Performance Standards (NSPS) 40 CFR 60, Subpart RR - Standard of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement
- b. The coating lines shall comply with the following emission standards pursuant to 40 CFR 60.442:
  - i. Do not cause the discharge into the atmosphere more than 0.20 kg VOM/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or
  - ii. Demonstrate for each coating line:
    - A. A 90 percent overall VOM emission reduction as calculated over a calendar month; or
    - B. The percent overall VOM emission reduction specified in §60.443(b) as calculated over a calendar month.
- c. At all times, the Permittee shall, to the extent practicable, maintain and operate coating line in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the New Source Performance Standard.
3. This permit is issued based upon the paper coating operations performed at the facility are subject to and shall comply with the VOM emission limitations of 35 Ill. Adm. Code Part 218, Subpart F: Coating Operations. Compliance with the requirements of this subpart shall be achieved through the use of compliance coating pursuant to Section 218.204(c): the VOM content of the coatings, as applied, shall not exceed 2.3 lb/gal (excluding water and any compounds which are specifically exempted from the definition of VOM), or through the use of a capture system and control device that provides 81 percent reduction in the overall VOM emissions and a control device has 90 percent efficiency, pursuant to 35 Ill. Adm. Code 218.207(b)(1).
4. The VOM emissions from the two coating lines shall not exceed 2.0 tons/month and 19.0 tons/year.

The VOM emissions shall be determined from the following equation:

$$E = \sum(A_i \times C_i) \times (1 - CE) + S_j \times C_j - W \times C_w,$$

Where:

E - VOM emissions (ton);

A<sub>i</sub> - individual coating usage (ton);

- $C_i$  - VOM content of the individual coating (wt. fraction);
- CE - overall efficiency of the capture and control device (fraction) demonstrated during the most recent stack test; CE = 0 when afterburner is not in operation;
- $S_j$  - clean-up solvent usage (ton);
- $C_j$  - VOM content of the clean-up solvent (wt. fraction);
- W - certified amount of waste removed from the plant (tons);
- $C_w$  - certified VOM content of the waste (fraction).

- 5a. The control system shall be in operation at all times when coatings applied at any line are not in compliance with VOM content requirements of 35 Ill. Adm. Code 218.204(c).
- b. The control device shall be equipped with a monitoring device which is installed, calibrated, and maintained to continuously indicate and record the gas temperature both upstream and downstream of the catalyst bed.
- 6. This permit is issued based on negligible emissions of volatile organic material (VOM) from the hot melt coater, spray coater, and 2 liquid coaters. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- 7. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 8. The Permittee shall maintain daily records of the following information for each coating line:
  - a. The name and identification number of each coating as applied on each coating line;
  - b. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - c. Control device monitoring data.
  - d. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line.

- e. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
9. The Permittee shall maintain monthly records of the following items:
    - a. Names and amounts of coatings used (tons/month and tons/year) and their VOM and HAP content (weight %) separately for periods of times when control device was running and when emission to atmosphere was uncontrolled;
    - b. Control device operating hours and monitoring records;
    - c. Compliance calculations required by 40 CFR 60.443(b);
    - d. VOM and HAP emission calculations (tons/month and tons/year).
  10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.
  11. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or violation and efforts to reduce emissions and future occurrences.
  12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

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It should be noticed that this permit has been revised to include operation of catalytic afterburner and modifications described in the Construction Permit 03080039.

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:VJB:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the pressure sensitive tape coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of volatile organic material, 10 tons per year of individual hazardous air pollutants, and 25 tons per year of a combination of hazardous air pollutants at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less volatile organic material and hazardous air pollutants are used and control measures are more effective than required in this permit.

Emission Units	<u>VOM</u>	Emissions (tons/year)	
		<u>Single HAP</u>	<u>Total HAP</u>
Two coater	19.0		
Hot Melt, Spray and Liquid Coaters	1.8		
Plant-wide	21.8	<10	<25

VJB:psj