

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

WinCup

Attn: Mr. Mark Hink, Manager - Plant Engineering and Maintenance
1425 Hawthorne Lane
West Chicago, Illinois 60185

Application No.: 95120327

I.D. No.: 043090ABX

Applicant's Designation:

Date Received: December 08, 1995

Operation of: Polystyrene container manufacturer

Date Issued: November 23, 1999

Expiration Date²: November 23, 2004

Source Location: 1425 Hawthorne Lane, West Chicago, DuPage

Responsible Official: Mark Hink, Manager - Plant Engineering and Maintenance

This permit is hereby granted to the above-designated Permittee to operate a Polystyrene Foam Container Manufacturing Facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: March 2, 2000

Revision Date Issued: March 2, 2000

Purpose of Revision: Administrative Amendment

This administrative amendment revises typographical errors regarding compliance procedures in Sections 7.2.12 and 7.3.12. Because the changes in the permit were only administrative, no formal public notice was issued.

If you have any questions concerning this permit, please contact Michael J. Knobloch at 217/782-2113.

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

DES:MJK:psj

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

WinCup
1425 Hawthorne Lane
West Chicago, Illinois 60185
708/231-0800

I.D. No.: 043090ABX
Standard Industrial Classification: 3086, Plastics Foam Products

1.2 Owner/Parent Company

WinCup
7980 West Buckeye Road
Phoenix, Arizona 85048

1.3 Operator

WinCup
1425 Hawthorne Lane
West Chicago, Illinois 60185

Mark Hink, Manager - Plant Engineering and Maintenance
630/231-0800

1.4 General Source Description

WinCup is located at 1425 Hawthorne Lane, West Chicago. The source manufactures Polystyrene cups and containers from expandable polystyrene beads.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
Agency	Illinois Environmental Protection Agency
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
cm	Centimeter
CO	Carbon Monoxide
ERMS	Emission Reduction Marketing System
°F	Fahrenheit
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
in	inch
KPa	Kilopascal
Kg	Kilogram
l	Liter
LAER	Lowest Achievable Emission Rate
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
m ³	Cubic meter
MACT	Maximum Achievable Control Technology
Mg	Megagram
min	Minute
mmBtu	Million British thermal units
mmscf	Million standard cubic foot
mo	month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods

psi	Pound per square inch
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
T1	Title I - Identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - Identifies Title I conditions that are being established in this permit
T1R	Title I Revision - Identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquid
yr	Year
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Boilers B2 and B3

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Regrind Silos
Hips Bead Silos
Wastewater Treatment
Warehousing Activities
Ultra-Violet Printers
Paved Roadways/Parking Lots

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Control
01	Boiler (B1) York Shippley rated at 26.156 mmBtu/hr	1974	None
	Boiler (B4) Johnston rated at 24.4 mmBtu/hr	1988	None
	Boiler (B5) Cleaver Brooks rated at 12.55 mmBtu/hr	1975	None
02	Raw Material Preparation (5 pre-expanders/mixers)	1968	Boilers B4 and B5
	"New" pre-expander/mixer	1995	Boilers B4 and B5
03	Cup Manufacturing (173 cup molding machines)	1968	None
	15 "New" cup molding machines	1995	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and NO_x emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- 5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	271.84
Sulfur Dioxide (SO ₂)	0.16
Particulate Matter (PM)	3.75
Nitrogen Oxides (NO _x)	38.34
HAP, not included in VOM or PM	0
TOTAL	314.09

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and

Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are

not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 145 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 16.3766 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units
Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:

- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

Boilers B1, B4, and B5

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such

emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

Raw material preparation operations

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 Natural Gas Boilers (B1, B4, and B5)
Control None

7.1.1 Description

Boilers B1, B4, and B5 are being operated to provide process steam to the pre-expanders and cup molders and to provide building heat. The boilers only combust natural gas. Additionally boilers B4 and B5 are being utilized as a control for the pentane emissions from the EPS raw material preparation area.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Boiler (B1) York Shippley rated at 26.156 mmBtu/hr	None
	Boiler (B4) Johnston rated at 24.4 mmBtu/hr	None
	Boiler (B5) Cleaver Brooks rated at 12.55 mmBtu/hr	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions, is boilers B1, B4, and B5 listed in Condition 7.1.2.
- B. No person shall cause or allow the emission of carbon monoxide into the atmosphere from the affected boilers to exceed 200 ppm, corrected to 50 percent excess air on a per boiler basis [35 IAC 216.121].
- c. The affected boilers are subject to the limits identified in Condition 5.2.2.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to NSPS, 40 CFR 60 Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating unit was constructed, modified, or reconstructed prior to June 9, 1989 which is the applicability date.
- b. The affected boilers are not subject to 35 IAC 217.121, emissions of NO_x from new fuel combustion sources, because the actual heat input of the boilers is less than 73.2 MW (250 mmBtu/hr).

- c. The affected boilers are not subject to 35 IAC 215.301, Use of Organic Material, pursuant to 35 IAC 215.303, Fuel Combustion Emission Sources, which excludes the affected boilers from this requirement.

7.1.5 Operational and Production Limits and Work Practices

Boiler B4 natural gas usage shall not exceed 209 mmscf/yr. This limit is based on the maximum firing rate of the boiler and the maximum hours of operation.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the boilers are subject to the following:

- a. Emissions from boiler B4 shall not exceed the following limits. These limits are based on the natural gas usage in Condition 7.1.5 and the emission factors and formula listed in Condition 7.1.12.

PM (ton/mo)	SO ₂ (ton/mo)	VOM (ton/mo)	NO _x (ton/mo)	CO (ton/mo)
.066	.0053	.048	.87	.73

PM (ton/yr)	SO ₂ (ton/yr)	VOM (ton/yr)	NO _x (ton/yr)	CO (ton/yr)
.79	.063	.57	10.45	8.78

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1N].

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from affected boiler B4 below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1 and 7.1.5 pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for the affected boilers (mmscf/mo and mmscf/yr) (Note mm = 1,000,000)
- b. Each individual pollutant emission of NO_x, CO, PM, SO₂, and VOM from the affected boilers (ton/mo and ton/yr) when fired with natural gas.
- c. Total natural gas usage for affected boiler B4 (mmscf/mo and mmscf/yr) (Note mm = 1,000,000)
- d. Each individual pollutant emission of NO_x, CO, PM, SO₂, and VOM from affected boiler B4 (ton/mo and ton/yr) when fired with natural gas.

7.1.10 Reporting Requirements

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 Agency'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 exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(b) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected boilers.
- b. Compliance with Condition 5.5.1 and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formula listed below:

- i. To determine compliance with Condition 5.5.1 and 7.1.6, emissions from the affected boilers burning natural gas shall be calculated based on the following emission factors and the formula below:

PM (lb/mmscf)	SO ₂ (lb/mmscf)	VOM (lb/mmscf)	NO _x (lb/mmscf)	CO (lb/mmscf)
7.6	0.6	5.5	100	84

The above emission factors are standard emission factors from AP-42, Volume I, Supplement F, February 1998.

Gas Boiler Emissions (tons) = [(Natural Gas consumed, mmscf) x (The appropriate emission factor, Lb/mmscf)]/2000 Lb/ton

7.2 Unit 02 - Raw Material Preparation
Control - Boilers B4 or B5

7.2.1 Description

Raw material preparation is conducted in a mixing room and a pre-expansion room. In the mixing room, expandable polystyrene beads are vacuumed from 1000 Lb containers into pre-expansion chambers. In the pre-expansion room the EPS beads are expanded in a continuous steam pre-expander. The beads are then dried, screened for size, and stored in indoor silos. Emissions from these rooms are ducted to boilers B4 or B5 as a means of control.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	Raw Material Preparation (6 pre-expanders/mixers)	Boilers B4 & B5

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected material preparation area" for the purpose of these unit specific conditions, is the raw material preparation area (6 pre-expanders/mixers) listed in Condition 7.2.2.
- b. The affected material preparation area is subject to the limits identified in Condition 5.2.2.
- c. The affected material preparation area is subject to 35 IAC 218.986 and shall provide emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit. [35 IAC 218.986(a)]
- d. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified in 35 IAC 212.322. [35 IAC 212.322]
- e. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or

premises, exceeds the allowable emission rates specified in 35 IAC 212.321. [35 IAC 212.321]

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected material preparation area is not subject to 35 IAC 218.301 because the VOM containing material, pentane is not a photochemically reactive material as per 35 IAC 211.4690.

7.2.5 Operational and Production Limits and Work Practices

- a. The expandable polystyrene bead process weight rate for the "New" pre-expander #6 installed under construction permit #95050223 shall not exceed 7.20 ton/day. Since all expanders are identical and operate the same amount of time, a mathematical average may be used.
- b. Monthly mathematical averages of pentane content of the EPS beads shall not exceed 6.1%, average by weight for all EPS lots received for that given month. This shall be determined by the summation of pentane weight percents for all lots received in the given month (as determined by product MSDS sheets) divided by the number of lots for that given month.

7.2.6 Emission Limitations

VOM emissions from the "New" pre-expander #6 shall not exceed the following limits:

VOM Emissions	
(lb/day)	(ton/year)
93	16.97

These emission limits are based off the maximum annual throughput of EPS beads through pre-expander #6, maximum pentane content allowed in the EPS beads, minimum control efficiency of 81%, 8760 hr/yr of operation, and a study conducted indicating that 58% of the pentane present in the EPS beads will volatilize during raw material preparation.

Compliance with annual limits shall be determined on a daily basis from the sum of the data for the current day plus the preceding 364 days (running 365 day total) [T1]

The above limitations were established in Construction Permit 95050223, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification

pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.2.7 Testing Requirements

When in the opinion of the Illinois EPA or USEPA it is necessary to conduct testing to demonstrate compliance with 35 IAC Subpart TT, the owner or operator of an affected material preparation area subject to the requirements of 35 IAC Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105. [35 IAC 218.991(a)(4)]

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected material preparation area to demonstrate compliance with Condition 5.5.1 and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

- a. The affected material preparation area being subject to 35 IAC 218.991(a)(2) shall collect and record all the following information each day and maintain the information at the source for a period of 3 years: [35 IAC 218.991(a)(2)]
 - i. Control device monitoring data.
 - A. Stack temperature of the boilers
 - B. Air flow rate from mixing pre-expansion room (cfm), obtained by measuring the speed of the air through the vent opening from the pre-expansion area into the boiler room by utilizing the velocity meter and multiplying by the area of the vents.
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source.
 - iii. 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.

- b. Amount of polystyrene processed (ton/day and ton/mo) for all pre-expanders combined.
- c. Emissions of VOM (ton/mo and ton/yr) for all pre-expanders combined.
- d. Polystyrene manufacturers certificate of analysis of percent pentane content by weight of polystyrene beads, as received.
- e. Amount of polystyrene processed (Lb/day and ton/yr) for pre-expander #6.
- f. Emissions of VOM (Lb/day and ton/yr) for pre-expander #6.

7.2.10 Reporting Requirements

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 Agency'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 exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

- a. Polystyrene usage in excess of the limits in Conditions 7.2.5(a).
- b. Pentane content in excess of the limits in Condition 7.2.5(b).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

- a. Compliance with Condition 5.5.1 and the emission limits in Condition 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formula listed below:

VOM Emissions (Lb/day) = EPS usage (Lb/day) x (C₁)* x (1-control efficiency(%))

* This is a derived constant based on the difference between the average pentane content of the EPS beads prior to processing and the pentane content left in the cup after raw material preparation. Manufacturing MSDS

sheets indicate that the average pentane content (as received) is 6.0% and tests conducted at similar facilities indicate that 2.5% residual pentane is left in the cups after molding.

$$\text{Therefore } C_1 = (.060) - (.025) = .035$$

- b. Compliance with Conditions 7.2.3(d) and (e) is inherent in the operation of raw material preparation so that no special compliance procedures are set in this permit.

7.3 Unit 03 - Cup Manufacturing
Control - None

7.3.1 Description

Pre expanded polystyrene beads are conveyed to 188 polystyrene cup molding machines, loaded into closed preheated molds, injected with steam, and finally cooled to take on a permanent shape.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	Cup Manufacturing (188 cup molding machines)	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected cup manufacturing process" for the purpose of these unit specific conditions, is the cup molding machines listed in Condition 7.3.2.
- b. The affected cup manufacturing process is subject to 35 IAC 218, Subpart TT, Other Emission Units.
- c. The affected cup manufacturing process is subject to the limits identified in Condition 5.2.2
- d. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified in 35 IAC 212.322. [35 IAC 212.322]
- e. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321. [35 IAC 212.321]

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected cup manufacturing process is not subject to 35 IAC 218.301 because the VOM containing

material, pentane is not a photochemically reactive material as per 35 IAC 211.4690.

- b. The affected cup manufacturing process is not subject to the control requirements of 35 IAC 218.986 due to the exemption in 35 IAC 218.980 (f).

7.3.5 Operational and Production Limits and Work Practices

- a. The pre-expanded polystyrene bead process weight rate for the 15 "New" cup molding machines installed under construction permit #95050223 shall not exceed 1.78 ton/day.

7.3.6 Emission Limitations

VOM emissions from the 15 "New" cup molding machines shall not exceed the following limits:

VOM Emissions	
(lb/day)	(ton/year)
21.4	3.89

These emission limits are based off the maximum annual throughput of pre-expanded polystyrene beads through the 15 new cup molding machines, maximum pentane content allowed in the EPS beads, 8760 hr/yr of operation, and a study conducted indicating that 42% of the pentane present in the EPS beads will volatilize during the cup molding process.

Compliance with annual limits shall be determined on a daily basis from the sum of the data for the current day plus the preceding 364 days (running 365 day total) [T1]

The above limitations were established in Construction Permit 95050223, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.3.7 Testing Requirements

When in the opinion of the Illinois EPA or USEPA it is necessary to conduct testing to demonstrate compliance with the conditions of this permit, the owner or operator of an affected cup manufacturing process shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105.

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected cup manufacturing process to demonstrate compliance with Condition 5.5.1, 7.3.5, and 7.3.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Amount of polystyrene processed (Lb/day and ton/yr) for all cup molding machines combined and for the 15 new cup molding machines.
- b. Emissions of VOM (Lb/day and ton/yr) for all cup molding machines combined and for the 15 new cup molding machines.
- c. Polystyrene manufacturers certificate of analysis of percent pentane content by weight of polystyrene beads, as received.

7.3.10 Reporting Requirements

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 Agency'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 exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

- a. Polystyrene usage in excess of the limits in Conditions 7.3.5.
- b. Emissions of VOM in excess of the limits in Condition 7.3.6.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

- a. Compliance with Condition 5.5.1 and the emission limits in Condition 7.3.6 shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formula listed below.

VOM Emissions (Lb/day) = EPS usage (Lb/day) x (C₁)*

* This is a derived constant based on the difference between the average pentane content of the EPS beads prior to molding and the pentane content left in the cup after the molding process. Tests conducted at similar facilities indicate that 1.9% residual pentane is left in the cups after molding.

Therefore C₁ = (.025) - (.019) = .006

c. Compliance with Conditions 7.3.3(d) and (e) is inherent in the operation of the cup manufacturing process so that no special compliance procedures are set in this permit.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after August 29, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written

notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;

- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153
 - iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by

permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

MJK:psj

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

WinCup is located at 1425 Hawthorne Lane, West Chicago. The source manufactures Polystyrene cups and containers from expandable polystyrene beads.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Control
01	Boiler (B1) York Shippley rated at 26.156 mmBtu/hr	1974	None
	Boiler (B4) Johnston rated at 24.4 mmBtu/hr	1988	None
	Boiler (B5) Cleaver Brooks rated at 12.55 mmBtu/hr	1975	None
02	Raw Material Preparation (5 pre-expanders/mixers)	1968	Boilers B4 and B5
	"New" pre-expander/mixer	1995	Boilers B4 and B5
03	Cup Manufacturing (173 cup molding machines)	1968	None
	15 "New" cup molding machines	1995	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	271.84
Sulfur Dioxide (SO ₂)	0.16
Particulate Matter (PM)	3.75
Nitrogen Oxides (NO _x)	38.34
HAP, not included in VOM or PM	0
TOTAL	314.09

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.