

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Daubert Cromwell, LLC  
Attn: Roy Galman  
12701 South Ridgeway Avenue  
Alsip, Illinois 60803

<u>Application No.:</u> 02040026	<u>I.D. No.:</u> 031003ADP
<u>Applicant's Designation:</u>	<u>Date Received:</u> February 14, 2006
<u>Subject:</u> Paper Coating Operation	
<u>Date Issued:</u> February 8, 2008	<u>Expiration Date:</u> April 8, 2010
<u>Location:</u> 12701 South Ridgeway Avenue, Alsip, Cook County 60803	

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

4 Corrosion Inhibitor (CI) Coating and Printing Lines (Lines #1, 2, 3 and 4)  
1 Wax Coating Line  
8 CI/Wax Mixing Tanks

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

- 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., 100 tons/year for VOM). As a result, the source is excluded from requirements 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 initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 Ill. Adm. Code Part 205, pursuant to 35 Ill. Adm. Code 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source

obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in a Clean Air Act Permit Program (CAAPP) permit or a Federally Enforceable State Operating Permit (FESOP).

- c. Pursuant to 35 Ill. Adm. Code 205.316(a), any participating or new participating source shall not operate without a CAAPP permit or FESOP. Pursuant to 35 Ill. Adm. Code 205.316(a)(2), if a participating or new participating source does not have a CAAPP permit containing ERMS provisions and the source elects to obtain a permit other than a CAAPP permit, the source shall apply for and obtain a FESOP that contains, in addition to other necessary provisions, federally enforceable ERMS provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205.
- 3. This permit is issued based on the potential to emit (PTE) for hazardous air pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act being less than 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such less quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program (CAAPP) permit from the Illinois EPA.
- 4a. Emissions and operation of 3 CI coating and printing lines (Lines # 1,2 and 3) emission units at the source, which were installed between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone) shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>Emission</u>	<u>VOM Emissions</u>	
	<u>(Lbs/Mo)</u>	<u>(Lbs/Yr)</u>	<u>Factor</u> <u>(%)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
CI Coatings	95,616	1,125,800	2.93	2,802	16.49
Inks	170	2,000	100.00	170	1.00

These limits are based on the gravimetric testing, maximum material application rates, and 8,760 hours of operation.

- b. Emissions and operation of CI coating and printing line (Line #4) emission units constructed after June 15, 2005 shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>Emission</u>	<u>VOM Emissions</u>	
	<u>(Lbs/Mo)</u>	<u>(Lbs/Yr)</u>	<u>Factor</u> <u>(%)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
CI Coatings (Line #4)	200,000	2,000,000	1.0	1.00	10.00

These limits are based on maximum material usage and the corresponding maximum emission rate.

- c. Pursuant to 35 Ill. Adm. Code 218.204(c), any coating applied at any time in the new CI coating and printing line shall not exceed 2.3 lbs VOM per volume of coating (lbs/gallon) (minus water and any other compounds which are specifically exempted from the definition of VOM) as applied to each applicator.
- 5a. Emissions and operation of the wax coating line emission units at the source, which were installed between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone) shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lbs/Month)</u>	<u>(Lbs/Year)</u>	<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>
Wax Laminating Coating	995	11,720	995	5.86

These limits are based on VOM usage = material usage x material VOM content, complete volatilization of the VOM content of the material, maximum application rates, and 8,760 hours of operation.

- b. Pursuant to 35 Ill. Adm. Code 218.204(c), the wax laminating coating's VOM content shall not exceed 2.3 lbs/gallon, minus water and other exempted compounds.
- 6. This permit is issued based on negligible emissions of volatile organic material (VOM) from the 8 CI/wax mixing tanks emission units at the source, which were installed between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone). For this purpose total emissions from all 8 tanks shall not exceed nominal emission rates of 0.2 lb/hour and 0.88 tons/year.
- 7. Compliance with the annual limits of this permit 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).
- 8. Pursuant to Adjusted Standard AS 03-5, issued on September 18, 2003 and amended on November 20, 2003 shall apply to CI coating printing lines #1, 2, and 3:
  - a. Pursuant to Section 28.1 of the Environmental Protection Act, The board grants CP-D Acquisition Company, LLC an adjusted standard from 35 Ill. Adm. Code 218.204(c) effective September 18, 2003. The Adjusted Standard applies to the equipment and emission sources at this facility.
  - b. The 2.3 pounds of volatile organic material (VOM) per gallon of coating applied limitation of 35 Ill. Adm. Code 218.204 (c) does

not apply. Instead, CP-D Acquisition Company, LLC is subject to the following:

- i. The Total VOM Emissions from this Cromwell-Phoenix, Inc facility must not exceed 25 Tons per year;
  - ii. The Versil Pak Wax laminating coatings must continue to meet the limitations of 35 Ill. Adm. Code 218.204 (c);
  - iii. The web fed and sheet fed corrosion inhibiting (CI) coating and printing lines must use CI solutions which, as applied, do not exceed 8.3 lbs of VOM per gallon of coating, less water;
  - iv. CP-D Acquisition Company, LLC must operate in full compliance with all other applicable provisions of 35 Ill. Adm. Code Part 218, including but not limited to Subpart F;
  - v. CP-D Acquisition Company, LLC must continue to investigate CI coatings with a reduced VOM content. Where practicable, CP-D Acquisition Company, LLC must substitute current coatings with lower VOM content coatings as long as such substitution does not result in a net increase in VOM emissions. Beginning on October 1, 2004 CP-D Acquisition Company, LLC must prepare and submit each year an annual report summarizing the activities and results of these investigative efforts. This annual report must be submitted to the Illinois EPA Bureau of Air Compliance and Enforcement Unit;
  - vi. CP-D Acquisition Company, LLC must operate in full compliance with the Clean Air Act, Illinois Environmental Protection Act, and any other applicable regulations; and
  - vii. CP-D Acquisition Company, LLC must continue to report all annual emissions to the Illinois EPA in accordance with the requirements of 35 Ill. Adm. Code Part 254.
9. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
10. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential

to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 11a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
    - A. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
    - B. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures that may be specified in this permit; and
    - C. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
  - ii. For emission units at the source, which were installed between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone);
  - iii. Name, Usage (lbs/day, lbs/month and lbs/year), VOM and HAP contents, Emissions rates, and VOM and HAP emissions for the following material:

- A. CI coatings including testing compositions;
  - B. Inks;
  - C. Wax laminates,
- iv. VOM content minus water and other exempt compounds of the CI coatings and Wax laminates;
  - v. For emission units constructed after June 15, 2005:
  - vi. Name, Usage (lbs/day, lbs/month and lbs/year), VOM and HAP contents, Emissions rates, and VOM and HAP emissions for the following material:
    - A. CI coatings including testing compositions;
    - B. Inks;
    - C. Wax laminates,
  - vii. VOM content minus water and other exempt compounds of the CI coatings and Wax laminates;
  - viii. VOM emission from mixers; and
  - ix. Monthly and annual VOM and HAP emissions of the source (all emission units) with supporting calculations (lbs/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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 an Illinois EPA or USEPA request for records during the course of a source inspection.
- 12. If there is an exceedance of or a deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.

13. Two (2) copies of required reports and notifications 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

It should be noted that this permit has been revised to incorporate Construction Permit 05050076 for addition of CI coating and printing line #4.

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

Edwin C. Bakowski, P.E.  
Acting Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:GMK:psj

cc: Region 1

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission of an affected paper coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario, which results in maximum emissions from such a plant. Limiting usage of VOM and HAP containing materials to levels below major status and basing emissions are equal to the usage of these materials. The resulting maximum emissions are below the levels (e.g., 100 tons per year of volatile organic material), at which a plant would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this facility will be less than predicted in this summary to the extent that the plant uses less of material, gaseous fuel is used, and control measures are more effective than required by this permit.

<u>Equipment/Process</u>	EMISSIONS (Tons/Year)	
	VOM	
3 CI Coating (Lines # 1, 2, and 3)		16.49
1 CI Coating (Line #4)		10.00
Inks		1.00
Wax Coating Line		5.86
2 Mixing Tanks (Total)		<u>0.88</u>
	Total:	34.23

GMK:psj