

217/782-2113

"REVISED"
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Source - Huck Store Fixture Company
Attn: Michelle Carter
1100 North 28th Street
Quincy, Illinois 62301

Application No.: 90050036

I.D. No.: 001065AFU

Applicant's Designation:

Date Received: April 5, 2006

Subject: Wood Furniture Manufacturing

Date Issued: May 23, 2006

Expiration Date: September 23, 2007

Location: 1100 North 28th, Quincy

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of seven paint spray booths each with an air filtration system, three curtain coaters, and a glue spreader as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons per year of volatile organic material (VOM), 25 tons per year of combined hazardous air pollutants (HAP), and 10 tons per year of single HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to 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.
2. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
3. The VOM content for each coating as applied in the seven spray paint booths and two curtain coaters shall not exceed the following:

(Lbs/Gallon)

Clear Topcoat	5.6
Opaque Stain	4.7
Pigmented Coat	5.0

	<u>(Lbs/Gallon)</u>
Repair Coat	5.6
Sealer	5.6
Semi-Transparent Stain	6.6
Wash Coat	6.1

pursuant to 35 Ill. Adm. Code 215.204(1).

- 4a. Emissions of volatile organic material (VOM) from new and all existing sources at this facility, shall not exceed the following limits:

<u>Item of Equipment</u>	VOM Usage and Emissions	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Seven Spray Paint Booths, Glue Spreader, and Two Curtain Coaters		
Total	9.50	95.0

These limits are based on maximum usage rates of coatings and glue, maximum hours of operation, and average VOM contents. Compliance with annual limits shall be determined from a running total of the previous 12 months of data.

- b. Note that there is a "nested" limit on the emissions of HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOM and therefore limiting VOM emissions also limits HAP emissions.
5. Emissions of particulate matter (PM) from new and all existing sources at this facility, shall not exceed the following limits:

<u>Item of Equipment</u>	Particulate Matter Emissions	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Seven Spray Paint Booths, One Glue Spreader and Two Curtain Coaters		
Total	0.77	7.63

These limits are based on the average solids content of coatings (1.49 lbs/gallon), a 50% coating solids emission rate, and collection efficiencies for the spray booth (71.25%). Compliance with annual limits shall be determined from a running total of the previous 12 months of data.

6. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

7. In the event that the operation of this source 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.
8. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in a rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 9a. Within 90 days of a written request from the Illinois EPA, tests shall be performed which will allow evaluation of the representative coatings "as applied" in order to determine compliance with the requirements of Special Condition Nos. 2 and 4.
- b. These tests shall be performed by an approved independent laboratory by the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 215.105.
- c. The submitted data shall include the following:
 - i. The VOM content of the representative coatings (minus water and exempt compounds) "as applied" (pounds per gallon);
 - ii. The HAP content of the representative coatings (minus water) "as applied" (pounds per gallon);
 - iii. A justification why the coatings are representative;
 - iv. A description of the sampling procedures; and
 - v. Documentation for the analysis.
10. The Final Report(s) for all tests shall be submitted within 180 days after the date of the test. The Final Report shall include as a minimum:
 - a. General information describing the test, including the name and identification of the emission source which was tested, date of test, name of personnel performing the tests, and Agency observers, if any;
 - b. A summary of results;
 - c. Description of test procedures, including description of test equipment, and test schedule; and

- d. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
11. The Permittee demonstrating that his 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), and that source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard because of limitations on the source's potential to emit or an exclusion, the Permittee must keep a record of the applicability determination on site at the source for a period of five yeasts after the determination, or until the source changes its operations to become an affected source, whichever comes first.
- 12a. The Permittee shall maintain the following daily records:
- i. The name and identification number of each coating as applied;
 - ii. The calculations of VOM and HAPs emissions per volume of paint and glue (minus water and any compounds which are specifically exempted from the definition of VOM) as applied (lbs/gallon).
- b. The Permittee shall maintain the following monthly records:
- i. The name and identification number of each coating used;
 - ii. The usage (gallons/month), density (lbs/gallon), VOM and HAP content of each coating (weight percent or lbs/gallon);
 - iii. The name and identification number of solvents used;
 - iv. The usage (gallons/month), density (lbs/gallon), VOM and HAP content of each solvent (weight percent or lbs/gallon);
 - v. The usage (gallons/month) and VOM and HAP content of glue (weight % or lbs/gallon);
 - vi. Separate emission records for each individual HAP with emission rate exceeding 0.5 tons/month; and
 - vii. VOM and HAP emissions with supporting calculations for the current month and total running for last 12 months (tons/month and tons/year).
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five 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.

13. If there is an exceedance of or 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.
14. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
1340 North Ninth Street
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
5415 North University
Peoria, Illinois 61614

Please also note that this permit has been revised to incorporate Construction Permit #06040002 for addition of one curtain coater and revise operation of spray booths and glue spreader.

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

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

DES:GMK:psj

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this wood furniture manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This scenario is maximum operating hours and material usage from the spray paint booths, glue spreader and 3 curtain coaters. The resulting maximum emissions are below the levels, e.g., 100 tons per year of VOM, 25 tons per year of combined HAPs, and 10 tons per year of single HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, equipment operating hours are lower, and control measures are more effective than required in this permit.

<u>Equipment</u>	E M I S S I O N S (Tons/Year)			
	<u>VOM</u>	<u>PM</u>	<u>Single HAP</u>	<u>Combined HAPs</u>
Seven Spray Paint Booths, Glue Spreader, and three Curtain Coaters	95.0	7.63		
Totals	<u>95.0</u>	<u>7.63</u>	<u>< 10</u>	<u>< 25</u>

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