

Pollutant (HAP) and 25 tons/year for any combination of such HAPs). 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.

- ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - b. Prior to the issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permit(s) for this location.
2. Boiler #1 is subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.40c(a), Except as provided in 40 CFR 60.40c(d), (e), (f), and (g), the affected facility to which 40 CFR 60 Subpart Dc applies is each steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (mmBtu/hour)) or less, but greater than or equal to 2.9 MW (10 mmBtu/hour).
- 3a. This permit is issued based on flexible polyurethane foam or rebond foam production and fabrication facilities at the plant are subject to the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR 63 Subparts A and OOOOOO. The Illinois EPA is administering the NESHP in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 63.11414(b), the provisions of 40 CFR 63 Subpart OOOOOO apply to each new and existing affected source that meets the criteria listed in 40 CFR 63.11414(b)(1) through (4).
- i. A slabstock flexible polyurethane foam production affected source is the collection of all equipment and activities necessary to produce slabstock flexible polyurethane foam.
 - ii. A molded flexible polyurethane foam production affected source is the collection of all equipment and activities necessary to produce molded foam.
 - iii. A rebond foam production affected source is the collection of all equipment and activities necessary to produce rebond foam.
 - iv. A flexible polyurethane foam fabrication affected source is the collection of all equipment and activities at a flexible

polyurethane foam fabrication facility where adhesives are used to bond foam to foam or other substrates. Equipment and activities at flexible polyurethane foam fabrication facilities which do not use adhesives to bond foam to foam or other substrates are not flexible polyurethane foam fabrication affected sources.

- b. Pursuant to 40 CFR 63.11414(c), an affected source is existing if you commenced construction or reconstruction of the affected source on or before April 4, 2007.
 - c. Pursuant to 40 CFR 63.11415(b), if you own or operate an existing molded flexible polyurethane foam affected source, an existing rebond foam production affected sources, or an existing flexible polyurethane foam fabrication affected source, you must achieve compliance with the applicable provisions in 40 CFR 63 Subpart 000000 by July 16, 2007.
- 4a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
 - c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
 - d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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 Ill. Adm. Code 212.321(c).
5. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of

sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

- 6. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air.
- 7a. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall only apply to photochemically reactive material.
- c. Pursuant to 35 Ill. Adm. Code 218.900(a), except as provided in 35 Ill. Adm. Code 218.900(b), on and after May 1, 2012, the requirements of 35 Ill. Adm. Code 218 Subpart JJ shall apply to miscellaneous industrial adhesive application operations at sources where the total actual VOM emissions from all such operations, including related cleaning activities, equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.904(a)(1)(B), in the absence of air pollution control equipment.
- d. Pursuant to 35 Ill. Adm. Code 218.901(b)(1)(D), the owner or operator of adhesive application operations listed in 35 Ill. Adm. Code 218.901(b) shall comply with the following VOM emission limitations, minus water and any compounds that are specifically exempted from the definition of VOM, as applied. If an adhesive is used to bond dissimilar substrates together, the substrate category with the highest VOM emission limitation shall apply:

	kg VOM/l	lb VOM/gal
	adhesive or	adhesive or
	adhesive	adhesive
	primer	primer
	applied	applied
General adhesive application operations		
Porous material (except wood)	0.120	(1.0)

- e. Pursuant to 35 Ill. Adm. Code 218.901(c), no owner or operator of a source subject to 35 Ill. Adm. Code Subpart JJ shall operate a miscellaneous industrial adhesive application operation unless the daily-weighted average VOM content of subject adhesives as applied each day by the operation, calculated in accordance with 35 Ill. Adm. Code 218.901(c) (1), is less than or equal to the emissions limitation calculated in accordance with 35 Ill. Adm. Code 218.901(c)(2).

- i. Weighted Average of VOM Content of Adhesives Applied Each Day

$$VOM_{WA} = \frac{\sum_{i=1}^n V_i VOM_i}{\sum_{i=1}^n V_i}$$

Where:

VOM_{WA} = The weighted average VOM content in units of kg (lbs) VOM per volume in liters (gallon) of all subject adhesives as applied each day;

i = Subscript denoting a specific adhesive as applied;

n = The number of different adhesives as applied each day by each miscellaneous industrial adhesive application operation;

V_i = The volume of each adhesive, as applied, in units of l (gal);

VOM_i = The VOM content in units of kg (lbs) VOM per volume in liters (gallons) of each adhesive as applied;

- ii. Allowable Weighted Average VOM Limit for an Averaging Operation

$$Limit_{WA} = \frac{\sum_{i=1}^n V_i Limit_i}{\sum_{i=1}^n V_i}$$

Where:

$Limit_{WA}$ = The allowable weighted average VOM limit in units of kg (lbs) VOM per volume in liters (gallons) of all subject adhesives as applied each day in a single operation;

i = Subscript denoting a specific adhesive as applied;

- n = The number of different adhesives as applied each day by each miscellaneous industrial adhesive application operation;
- V_i = The volume of each adhesive, as applied, in units of 1 (gallons);
- $Limit_i$ = The VOM limit, taken from 35 Ill. Adm. Code 218.901(b), in units of kg (lbs) VOM per volume in liters (gallons) of each adhesive as applied.

- 8. This permit is issued based upon storage tanks 1B and 2B not being subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60 Subpart Kb. Pursuant to 40 CFR 60.110b(b), 40 CFR 60 Subpart Kb does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa.
- 9a. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production, 40 CFR 63 Subpart III and the NESHAP for Flexible Polyurethane Foam Fabrication Operations, 40 CFR 63 Subpart M. This is a result of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- b. This permit is issued based on the boiler not being subject to the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ. Pursuant to 40 CFR 63.11195(e), gas-fired boilers are not subject to 40 CFT 63 Subpart JJJJJJ.
- 10a. This permit is issued based on the storage tanks at this source not being subject to 35 Ill. Adm. Code 218.120, Control Requirements for Storage Containers for VOL. Pursuant to 35 Ill. Adm. Code 218.119(f), the limitations of 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL) shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gallons) capacity or greater, except to vessels with storage capacity less than 40,000 gallons must comply with 35 Ill. Adm. Code 218.129(f).
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the

loading of VOL with a vapor pressure of 17.24 kPa (2.5 psi) or greater at 294.3°K (70°F).

- c. This permit is issued based on the solvent cleaning operations at this source not being subject to 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations which use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units.
 - d. Pursuant to 35 Ill. Adm. Code 218.900(b)(2), the requirements of 35 Ill. Adm. Code 218.901(b) through (e) shall not apply to the following:
 - i. Aerosol adhesive and aerosol adhesive primer application operations;
 - ii. Operations using adhesives and adhesive primers that are supplied to the manufacturer in containers with a net volume of 0.47 liters (16 oz) or less, or a net weight of 0.45 kg (1 lb) or less.
 - e. This permit is issued based upon the gluing, foam pouring and fuel combustion operations not being subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes) and 35 Ill. Adm. Code 218 Subpart TT (Other Emission Units). This is a result of the federally enforceable production and operating limitations, which restrict a potential to emit of volatile organic materials (VOM) to less than 25 tons per year.
11. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

- 12a. Pursuant to 40 CFR 63.11416(a), if you own or operate a slabstock flexible polyurethane foam production affected source, you must meet the requirements in 40 CFR 63.11416(b). If you own or operate a molded foam affected source, you must meet the requirements in 40 CFR 63.11416(c). If you own or operate a rebond foam affected source, you must meet the requirements in 40 CFR 63.11416(d). If you own or operate a flexible polyurethane foam fabrication affected source, you must meet the requirements in 40 CFR 63.11416(e).
 - b. Pursuant to 40 CFR 63.11416(c) If you own or operate a new or existing molded foam affected source, you must comply with the requirements in 40 CFR 63.11416(c)(1) and (2).
 - i. You must not use a material containing methylene chloride as an equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process.
 - ii. You must not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process.
 - c. Pursuant to 40 CFR 63.11416(d), if you own or operate a new or existing rebond foam affected source, you must comply with the requirements in 40 CFR 63.11416(d)(1) and (2).
 - i. You must not use a material containing methylene chloride as an equipment cleaner in a rebond foam process.
 - ii. You must not use a mold release agent containing methylene chloride in a rebond foam process.
 - d. Pursuant to 40 CFR 63.11416(e), if you own or operate a new or existing flexible polyurethane foam fabrication affected source, you must not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process.
 - e. Pursuant to 40 CFR 63.11418, the provisions in 40 CFR Part 63, Subpart A, applicable to sources subject to 40 CFR 63.11416(b)(1) are specified in Table 1 of 40 CFR 63 Subpart 000000 (see Attachment B).
- 13a. Pursuant to 35 Ill. Adm. Code 218.901(e), the owner or operator of a source subject to 35 Ill. Adm. Code 218 Subpart JJ shall apply all miscellaneous industrial adhesives using one or more of the following methods:
- i. Electrostatic spray;
 - ii. High volume low pressure (HVLP) spray;
 - iii. Flow coating. For the purposes of 35 Ill. Adm. Code 218 Subpart JJ, flow coating means a non-atomized technique of applying

coating to a substrate with a fluid nozzle with no air supplied to the nozzle;

- iv. Roll coating or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application;
 - v. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 218 Subpart JJ, "electrodeposition" means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
 - vi. Airless spray;
 - vii. Air-assisted airless spray; or
 - viii. Another adhesive application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.
- b. Pursuant to 35 Ill. Adm. Code 218.901(f), the owner or operator of a source subject to 35 Ill. Adm. Code Part 218 Subpart JJ shall comply with the following work practices for each subject miscellaneous adhesive application operation at the source:
- i. Store all VOM-containing adhesives, adhesive primers, process-related waste materials, cleaning materials, and used shop towels in closed containers;
 - ii. Ensure that mixing and storage containers used for VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing those materials;
 - iii. Minimize spills of VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials;
 - iv. Convey VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials from one location to another in closed containers or pipes; and
 - v. Minimize VOM emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- 14a. 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.

- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the filters and carbon adsorbers such that the filters and carbon adsorbers are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
 - c. The storage tanks at this source shall only be used to store volatile organic liquids with a vapor pressure not to exceed 0.5 psi unless the tank is a pressure vessels designed to operate in excess of 29.4 psia and without emissions to the atmosphere. The storage of any volatile organic liquid with a vapor pressure greater than 0.5 psi or the storage of a volatile petroleum liquid in a tank that is not a pressure vessel requires that the Permittee first obtain a construction permit from the Illinois EPA and may require performance testing to verify compliance with all applicable requirements.
 - d. The boiler, make up air heaters, rotation units, and space heaters shall only be operated with natural gas as the fuel. The use of any other fuel in the boiler, make up air heaters, rotation units, and/or space heaters requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 15a. Emissions of volatile organic materials (VOM) from foam pouring line and foam gluing line shall not exceed 2.5 ton/month and 24.0 tons/year. Emissions shall be calculated using the following equation:

$$E = \sum(P \times EF_P) + \sum(T \times EF_T) + \sum(G \times V_G) + \sum(CS \times V_{CS});$$

where:

E = VOM emissions (tons);

P = Polyol usage (tons);

EF_P = VOM emission factor for polyol (weight fraction), EF_P = 34 x 10⁻⁶;

T = TDI/MDI usage (tons);

EF_T = VOM emission factor for TDI/MDI (weight fraction), EF_T = 50 x 10⁻⁶;

G = Glue usage (tons);

V_G = VOM content of glue (weight fraction);

CS = Foam pouring and gluing lines cleaning solution usage (tons); and

V_{CS} = VOM content of cleaning solution (weight fraction).

These limits are based on the maximum production rate and polyurethane industry emission factors.

- b. Operation and emissions of the boiler, make up air heaters, rotation units, and space heaters (combined) shall not exceed the following limits:

- i. Natural Gas Usage: 10 mscf/month, 100 mmscf/year

- ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor (Lbs/mmscf)</u>	<u>Emissions (Tons/Month)</u>	<u>(Tons/Year)</u>
Carbon Monoxide (CO)	84.0	0.42	4.20
Nitrogen Oxides (NO _x)	100.0	0.50	5.00
Particulate Matter (PM)	7.6	0.04	0.38
Sulfur Dioxide (SO ₂)	0.6	0.01	0.03
Volatile Organic Materials (VOM)	5.5	0.03	0.28

These limits are based on the maximum fuel usage and standard emission factors (Tables 1.4-1, 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- c. This permit is issued based on negligible emissions of Volatile Organic Material (VOM) from all storage tanks and foam product curing area. For this purpose emissions from all such tanks shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
 - d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Flexible Polyurethane Foam Production, 40 CFR 63 Subpart III and the NESHAP for Flexible Polyurethane Foam Fabrication Operations, 40 CFR 63 Subpart M. M. M. M. M.
 - e. 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).
- 16a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Conditions 17 and 18 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
17. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 18a. Pursuant to 35 Ill. Adm. Code 218.902(a), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218 Subpart JJ shall be conducted by the owner or operator by May 1, 2012. Thereafter, testing shall be conducted within 90 days after a request by the Illinois EPA, or as otherwise provided in 35 Ill. Adm. Code 218 Subpart JJ. The testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during testing.
- b. Pursuant to 35 Ill. Adm. Code 218.902(b), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.901(b) shall be conducted as follows:

- i. Method 24, shall be used for non-reactive adhesives. If it is demonstrated to the satisfaction of the Illinois EPA and the USEPA that plant adhesive formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a facility's formulation data, the Method 24 test will govern;
 - ii. Appendix A of 40 CFR 63, Subpart PPPP, shall be used for reactive adhesives.
 - iii. The manufacturer's specifications for VOM content for adhesives may be used if the specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.902(b)(1) and (b)(2), as applicable.
- 19a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
- 20a. i. Pursuant to 40 CFR 60.48c(g)(1), except as provided under 40 CFR 60.48c(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each operating day.
- ii. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.
- iii. Pursuant to 40 CFR 60.48c(g)(3), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not

subject to 40 CFR 60 Subpart Dc) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

- b. Pursuant to 40 CFR 60.48c(i), all records required under 40 CFR 60.48 shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
21. 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.
- 22a. Pursuant to 40 CFR 63.11416(f), you may demonstrate compliance with the requirements in 40 CFR 63.11416(b)(2) and (c) through (e) using adhesive usage records, Material Safety Data Sheets, and engineering calculations.
- b. Pursuant to 40 CFR 63.11417(d), for molded foam affected sources, rebond foam affected sources, and flexible polyurethane foam fabrication affected sources containing a loop splitter, you must maintain records of the information used to demonstrate compliance, as

required in 40 CFR 63.11416(f). You must maintain the records for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site.

23. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 24a. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2):
 - i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;
 - ii. The VOM content of each cleaning solution as applied in each cleaning operation;
 - iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and
 - iv. The total monthly VOM emissions from cleaning operations at the source;
- c. Pursuant to 35 Ill. Adm. Code 218.904(b)(4), all sources subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart JJ shall retain all records required by 35 Ill. Adm. Code 218.904 for at least three years and make those records available to the Illinois EPA upon request.
- d. Pursuant to 35 Ill. Adm. Code 218.904(c)(2), the owner or operator of an adhesive application operation subject to the limitations of 35 Ill. Adm. Code 218.901 and complying by means of 35 Ill. Adm. Code 218.901(b) shall collect and record the name, identification number, and VOM content of each adhesive as applied each day by each adhesive application operation complying with 35 Ill. Adm. Code 218.901(b).
- e. Pursuant to 35 Ill. Adm. Code 218.904(d)(2), the owner or operator of an adhesive application operation subject to the limitations of 35 Ill.

Adm. Code 218.901 and complying by means of 35 Ill. Adm. Code 218.901(c) shall collect and record the following information each day for each adhesive application operation complying by means of 35 Ill. Adm. Code 218.901(c):

- i. The name, identification number, VOM content, and volume of each adhesive as applied each day by each subject adhesive application operation;
 - ii. The daily weighted average VOM content of all adhesives as applied by each subject adhesive application operation.
- 25a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the filters and carbon adsorbers:
 - A. Records for periodic inspection of the filters and carbon adsorbers with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Polyol, MDI and TDI usage (tons/month, tons/year);
 - iii. Cleaning solvent usage (tons/week, tons/year) and its VOM and HAP content (weight fraction);
 - iv. Glue usage (tons/month, tons/year) and its VOM and HAP content (weight fraction);
 - v. Natural gas usage (mmscf/month, mmscf/year); and
 - vi. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM and HAP emissions from the source with supporting calculations (tons/month, 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 storage device) 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.
26. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such

notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

- 27a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.904(b), all sources subject to the requirements of 35 Ill. Adm. Code 218 Subpart JJ shall:
- i. At least 30 calendar days before changing the method of compliance in accordance with 35 Ill. Adm. Code 218.901(b), (c), and (d), notify the Illinois EPA in writing of the change. The notification shall include a demonstration of compliance with the newly applicable subsection;
 - ii. Notify the Illinois EPA in writing of any violation of the requirements of 35 Ill. Adm. Code 218 Subpart JJ within 30 days following the occurrence of the violation and provide records documenting the violation upon request by the Illinois EPA;
- c. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 28a. 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 or 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.
- b. 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

If you have any questions on this, please call Valeriy Brodsky at 217/785-1705.

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

Date Signed: _____

ECB:VJB:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the urethane foam products manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP and 25 tons/year for any combination of such HAP) 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, materials with lower VOM and HAP contents are used, and control measures are more effective than required in this permit.

<u>Emission Units</u>	E M I S S I O N S (Tons/Year)						Single	Combined
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>	
Foam Pouring/Gluing Lines Storage Tanks, Foam Curing Area			0.44		0.44			
Natural Gas Combustion	4.20	5.00	0.38	0.03	0.28	----	----	
Total	<u>4.20</u>	<u>5.00</u>	<u>0.82</u>	<u>0.03</u>	<u>24.78</u>	<u>0.79</u>	<u>19.9</u>	

VJB:psj

Attachment B - Table 1 to Subpart 000000 of Part 63 – Applicability of
General Provisions to Subpart 000000

As required in 40 CFR 63.11418, sources subject to 40 CFR 63.11416(b)(1) must comply with the requirements of the NESHAP General Provisions (40 CFR part 63, subpart A) as shown in the following table.

Subpart A reference	Applies to Subpart 000000?	Comment
§63.1	Yes	
§63.2	Yes	Definitions are modified and supplemented by 40 CFR 63.11419.
§63.3	Yes	
§63.4	Yes	
§63.5	Yes	
§63.6(a)-(d)	Yes	
§63.6(e)(1)-(2)	Yes	
§63.6(e)(3)	No	Owners and operators of subpart 000000 affected sources are not required to develop and implement a startup, shutdown, and malfunction plan.
§63.6 (f)-(g)	Yes	
§63.6(h)	No	Subpart 000000 does not require opacity and visible emissions standards.
§63.6 (i)-(j)	Yes	
§63.7	No	Performance tests not required by subpart 000000.
§63.8	No	Continuous monitoring, as defined in subpart A, is not required by subpart 000000.
§63.9(a)-(d)	Yes	
§63.9(e)-(g)	No	
§63.9(h)	No	Subpart 000000 specifies Notification of Compliance Status requirements.
§63.9 (i)-(j)	Yes	
§63.10(a)-(b)	Yes	Except that the records specified in 40 CFR 63.10(b)(2) are not required.
§63.10(c)	No	
§63.10(d)(1)	Yes	
§63.10(d)(2)-(3)	No	
§63.10(d)(4)	Yes	
§63.10(d)(5)	No	
§63.10(e)	No	
§63.10(f)	Yes	
§63.11	No	
§63.12	Yes	
§63.13	Yes	
§63.14	Yes	
§63.15	Yes	
§63.16	Yes	