

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Sovereign Commercial Group, Inc.  
Attn: Jon Coy  
2301 North Route 30  
Plainfield, Illinois 60544

Application No.: 05070076

I. D. No.: 197080AAO

Applicant's Designation:

Date Received: July 29, 2005

Subject: Adhesives Manufacturing Plant

Date Issued:

Expiration Date:

Location: 2301 North Route 30, Plainfield

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of twenty-five adhesives mixing kettles and seventeen raw material and intermittent products storage tanks pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
    - i. To limit the emissions of hazardous air pollutant (HAP) from the source to less than major source thresholds (i.e., 10 tons/year for a single HAP and 25 tons/year for totalled HAP). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
    - ii. To limit the 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 issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permit(s) issued for this location.
2. 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 by 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.
  3. Emissions of volatile organic materials from adhesive mixing operations shall not exceed 2.0 tons/mo, 12 tons/yr.

The emissions of VOM and HAPs shall be determined from the following equation:

$$E = \sum (P_i \times C_i) \times EF + \sum (S_j \times C_j), \text{ where:}$$

E - VOM(HAP) emissions (ton);

$P_i$  - VOM(HAP)-containing material usage (ton);

$C_i$  - VOM(HAP) content of the raw material (wt. fraction);

$S_j$  - clean-up solvent usage (ton);

$C_j$  - VOM(HAP) content of the clean-up solvent (wt. fraction);

EF - emission factor. EF = 0.034 per USEPA publication Emission Inventory Improvement System, Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities.

These limits are based on the maximum production rate, actual VOM content of the raw materials and standard emission factor. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. This permit is issued based on negligible emissions of volatile organic materials from the storage tanks. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
5. The Permittee shall maintain monthly records of the following items:
  - a. Names and amounts of raw material used at the facility (tons/mo, tons/yr);
  - b. VOM and HAP content of raw materials used (wt. %);
  - c. VOM and HAP emissions with supporting calculations (tons/mo, tons/yr).
6. All records and logs required by this permit shall be retained at a easily 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 and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the record

keeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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

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

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

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

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

DES:VJB:

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Adhesive 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. The resulting maximum emissions are below the levels, e.g., 10 tons per year for a single HAP and 25 tons per year for totaled 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 material is handled, and control measures are more effective than required in this permit.

<u>Emission Units</u>	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAP</u>
Adhesive Mixers	12.0		
Storage Tanks	0.44		
Plant-Wide Total	12.4	< 10	< 25

VJB: