

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

U. S. Smokeless Tobacco Manufacturing Company
Attn: Domenico Serpe
11601 Copenhagen Court
Franklin Park, Illinois 60131

<u>Application No.:</u> 95120071	<u>I.D. No.:</u> 031096AIJ
<u>Applicant's Designation:</u>	<u>Date Received:</u> January 13, 2005
<u>Subject:</u> Tobacco Products Manufacturing	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 11601 Copenhagen Court, Franklin Park, Cook County	

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

Two (2) 12.554 mmBtu/hour Natural Gas-Fired Boilers;
Four (4) 10.5 mmBtu/hour Natural Gas-Fired Boilers;
One (1) 6.0 mmBtu/hour Natural Gas-Fired Preheater Burner (RTO);
One (1) 9.0 mmBtu/hour Natural Gas-Fired Preheater Burner (RTO);
One (1) 4.8 mmBtu/hour Natural Gas-Fired NG Injector (RTO);
One (1) 5.7 mmBtu/hour Natural Gas-Fired NG injector (RTO);
Dry Flour Casing Line Controlled by Baghouse;
Dry Flour Cutting Line Controlled by Baghouse;
Dry Flour Drying Line Controlled by Baghouse;
Tobacco Dryer Controlled by a Cyclone/Scrubber;
Paper Can Manufacture Controlled by Baghouse;
Weigh Room;
First pickle/Curing/Cure Turning Controlled by RTO;
Finishing Controlled by RTO
Six (6) Flavor Coaters Controlled by Filter and RTO;
Two Fluidizer-Coaters Controlled by Filter and RTO; and
Solvent Wipe Cleaning

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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for VOM and 10 tons/year for a single HAP and 25 tons/year of any combination of such HAPs). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program permit. 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 the current permit(s) 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 beginning with the following seasonal allotment period, 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.
- 3a. 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, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. 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.
- c. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment

applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.

- d. Pursuant to 35 Ill. Adm. Code 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.
- e. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- f. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- g. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U. S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less

than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

- h. Pursuant to 35 Ill. Adm. Code 212.321(a), 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).
- 4. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.
- 5. 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, pursuant to 35 Ill. Adm. Code 216.121.
- 6a. 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 source, 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 shall apply only to photochemically reactive material.
- b. Pursuant to 35 Ill. Adm. Code 218.302(a), emissions of organic material in excess of those permitted by 35 Ill. Adm. Code 218.301 are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water.
- c. Pursuant to 35 Ill. Adm. Code 218.986, every owner or operator of an emission unit subject to 35 Ill. Adm. Code 218 Subpart TT shall comply with the requirements of 35 Ill. Adm. Code 218.986(a), (b), (c), (d), or (e) below:
 - i. Emission capture and control equipment which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit; or
 - ii. For coating lines, the daily-weighted average VOM content shall not exceed 0.42 kg VOM/liter (3.5 lbs VOM/gallon) of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied during any day. Owners and operators complying with 35 Ill. Adm. Code 218.986 are not required to comply with 35 Ill. Adm. Code 218.301.

- iii. Any leaks from components subject to the control requirements of 35 Ill. Adm. Code 218 Subpart TT shall be subject to the following control measures by March 15, 1995:
 - A. Repair any component from which a leak of VOL can be observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found, unless the leaking component cannot be repaired until the next process unit shutdown, in which case the leaking component must be repaired before the unit is restarted.
 - B. For any leak which cannot be readily repaired within one hour after detection, the following records, as set forth below in 35 Ill. Adm. Code 218.986(e) (2), shall be kept. These records shall be maintained by the owner or operator for a minimum of two years after the date on which they are made. Copies of the records shall be made available to the Illinois EPA or USEPA upon verbal or written request.
 - I. The name and identification of the leaking component;
 - II. The date and time the leak is detected;
 - III. The action taken to repair the leak; and
 - IV. The date and time the leak is repaired.
- 7. Pursuant to 35 Ill. Adm. Code 218.980(d), no limits under 35 Ill. Adm. Code 218 Subpart TT shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 2.3 Mg (2.5 tons) per calendar year if the total emissions from such emission units not complying with 35 Ill. Adm. Code 219.986 does not exceed 4.5 Mg (5.0 tons) per calendar year.
- 8a. The regenerative thermal oxidizer shall be operated at all times when an associated coating line is in operation, except that the RTO may be shut down for a period not to exceed 2 days between November and March for maintenance.
- b. The regenerative thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but not less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1800°F in the absence of a compliance test. This temperature shall be maintained during all operation time.
- c. The boilers and regenerative thermal oxidizers shall only be operated with natural gas as the fuel. The use of any other fuel in the boilers and regenerative thermal oxidizers 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.

9a. Emissions and operation of the boilers and the RTO burners/injectors shall not exceed the following limits:

- i. Natural gas usage: 58 mmscf/month and 580 mmscf/year.
- ii. Total emissions from the combustion of natural gas shall not exceed the following limits:

<u>Pollutant</u>	<u>Emission Factor (Lbs/mmscf)</u>	<u>Emissions</u>	
		<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
NO _x	100	2.90	29.0
CO	84	2.44	24.4
VOM	5.5	0.16	1.6
SO ₂	0.6	0.02	0.2
PM	7.6	0.22	2.2

These limits are based on the maximum fuel usage, standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998), and a heat content of 1,020 Btu/scf for natural gas.

b. Emissions and operation of the Dry Flour Contingency Process shall not exceed the following limits:

<u>Process Equipment</u>	<u>Process Weight Rate (Tons/Hr)</u>	<u>Operating hours (Hr/Yr)</u>	<u>Particulate Matter Emissions</u>	
			<u>(Lbs/Hr)</u>	<u>(Tons/Yr)</u>
Casing (Picker, Feeders)	6.0	2,080	6.6	6.9
Cutting (Feeder, Bulking Bins, Cutters)	5.0	4,160	6.0	12.5
Drying (Sifters, Feeders, Bucket Elevators)	4.0	4,160	5.3	11.1

These limits are based on the process weight and operating hours of limitations are for each individual item of equipment making up a process segment (each line item under the "Process Equipment" heading). However, the particulate matter emissions rate limitations are for each process segment (e.g., casing line). The above limitations were established in Permit 93080108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- c. Emissions and operation of the Tobacco Dryer shall not exceed the following limits:

Operating Hours (Hours/Year)	Particulate Matter Emissions		VOM Emissions	
	(Lbs/Hour)	(Ton/Year)	(Lbs/Hour)	(T/Year)
4,160	0.1	0.44	1.10	2.29

These limits are based on the maximum operating hours and the maximum hourly emissions. The above limitations were established to ensure that the Tobacco Dryer is not subject to the control requirements of 35 Ill. Adm. Code Part 218, Subpart TT, Other Emission Units. The above limitations were also established in Permit 93080108, pursuant to 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification and the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- d. Emissions and operation of the Paper Can Line/Shredder/Cyclone shall not exceed the following limits:

Process Equipment	Process Weight Rate (Lbs/Hr)	Operating Hours (Hr/Yr)	Particulate Matter Emissions	
			(Tons/Mo)	(Tons/Yr)
Paper Can Department	9,700	4,992	3.0	29.5

These limits are based on the process weight and the maximum operating hours. The above limitations were established in Permit 93080108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- e. Emissions and operation of the Weigh Room shall not exceed the following limits:

Process Weight Rate		Particulate Matter Emissions	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
312	3,120	0.4	3.9

These limits are based on the process weight and the maximum operating hours. The above limitations were established in Permit 93080108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration

(PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- f. Emissions and operation of the first pickle casing cylinders, curing/cure turning, the flavor coaters, finishing lines, and fluidizer coaters shall not exceed the following limits:

- i. Usage of ethanol and emissions of VOM:

Ethanol Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
25	175	3.11	21.73

These limits are based on maximum usage of ethanol, a maximum uncontrolled emission rate of natural tobacco VOM from the flavor coaters and curing/cure turning of 8.75 tons/month, and a minimum 90% overall control efficiency of the RTO. The above limitations contain revisions to previously issued Permit 07070035. The source had requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of the aforementioned permit, consistent with the information provided in the FESOP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the FESOP application contains the most current and accurate information for the source.

- ii. VOM emissions from above listed affected emission units shall be calculated using the following formulas:

$$E1 = (UVOM(C) + UVOM(C) \times 0.135) \times 0.10$$

$$E2 = UVOM(F) \times 0.10$$

$$E3 = (0.4 \times H24 + 0.8 \times H48) / 2000 \times 0.10$$

$$E4 = (UC \times 2.3) \times 0.10$$

$$E5 = (UD \times 8.5) \times 0.10$$

$$UVOM = UVOM(C) + UVOM(F)$$

Where:

- E1 = Emissions from First Pickle and Curing/Cure Turning (tons/month or tons/year);
- E2 = Emissions from Finishing (tons/month or tons/year);
- E3 = Emissions from Flavor Coaters (tons/month or tons/year);
- E4 = Emissions from fluidized coating (tons/month or tons/year);
- E5 = Emissions from fluidized drying (tons/month or tons/year);
- UVOM(C) = VOM usage in First Pickle and Curing/Cure Turning (T/month or T/year);
- UVOM(F) = VOM usage in Finishing (tons/month or tons/year);
- UVOM = Plant-wide VOM usage (tons/month or tons/year);
- H24 = Combined hours of operation of all four 24 lb coaters (hours/month or hours/year);
- H48 = Combined hours of operation of both 48 lb coaters (hours/month or hours/year);
- UC = Usage of tobacco in fluidized coating (tons/month or tons/year);
- UD = Usage of tobacco in fluidized drying (tons/month or tons/year);
- 0.135 = Percent of tobacco hydrocarbon emissions based on VOM usage in First Pickle and Curing/Cure Turning;
- 0.4 = Emission factor for 24 lb coaters based on emission test (lbs VOM/hour);
- 0.8 = Emission factor for 48 lb coaters based on twice the factor for the 24 lb coaters (lbs VOM/hour);
- 0.10 = Percent of emissions leaving the RTO based on emission testing (100% capture and 90% destruction);
- 2.3 = Emission factor for fluidized coating based on stack test at similar facility (VOM lb/ton of tobacco mix);
- 8.5 = Emission factor for fluidized drying based on stack test at similar facility (VOM lbs/ton of tobacco mix); and
- 2000 = Conversion factor (lbs/ton).

- g. Emissions and operation of the Solvent wipe cleaning operation 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>(Tons/Month)</u>	<u>(Tons/Year)</u>
Clean-Up Solvents	780	7800	0.39	3.9

These limits are based on complete volatilization of the VOM content of the materials, material VOM usage = material usage x material VOM content.

- 10. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the first pickle/curing/cure turning, finishing, flavor coaters, and fluidized coaters 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 the source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit and the requirements of Section 112(g) of the Clean Air Act.
- 11. 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).
- 12a. 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 13 and 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 13a. Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR Part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. 35 Ill. Adm. Code 212 Subpart A shall not apply to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
 - c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
 - d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
 - e. 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.
14. Pursuant to 35 Ill. Adm. Code 218.988, when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with 35 Ill. Adm. Code 218.986, the owner or operator of a

VOM emission unit subject to the requirements of 35 Ill. Adm. Code 218 Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105.

- 15a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
- b. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or ± 0.50 C, whichever is greater.
16. 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.

17. 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.

- 18a. Pursuant to 35 Ill. Adm. Code 218.991(a)(2), any owner or operator of a VOM emission unit which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT and complying by the use of emission capture and control equipment shall collect and record all of the following information each day and maintain the information at the source for a period of three years:
 - i. Control device monitoring data;
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source; and
 - 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. Pursuant to 35 Ill. Adm. Code 218.991(b)(2), any owner or operator of a coating line which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT and complying by means of the daily-weighted average VOM content limitation shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating as applied on each coating line;
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line; and
 - iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104.

- 19a. 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. Records addressing use of good operating practices for the regenerative thermal oxidizers, baghouses, cyclones and scrubbers:
 - A. Records for periodic inspection of the regenerative thermal oxidizers, baghouses, cyclones and scrubbers 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.
 - iii. The use of natural gas in the boilers, (mmscf/month and mmscf/year);
 - iv. VOM usage in the First Pickle and Curing/Cure Turning operations (tons/month and tons/year);
 - v. VOM usage in the Finishing operations (tons/month and tons/year);
 - vi. Plant-wide total VOM usage (tons/month and tons/year);
 - vii. Hours of operation of each of the Flavor Coaters (hours/month and hours/year)
 - viii. Usage of tobacco in fluidized coating and drying operations (tons/month and tons/year); and
 - ix. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM and HAPs from the source, with supporting calculations (tons/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.

20. 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.
21. 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.
- 22a. 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.
 - b. Pursuant to 35 Ill. Adm. Code 218.991(a)(3), any owner or operator of a VOM emission unit which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT and complying by the use of emission capture and control equipment shall notify the Illinois EPA:
 - i. Of any violation of the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation;
 - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of capture systems and control devices to the use of complying coatings, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(a)(1) above. Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of capture systems and control devices to the use of complying coatings, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(b).
 - c. Pursuant to 35 Ill. Adm. Code 218.991(b)(3), any owner or operator of a coating line which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT and complying by means of the daily-weighted average VOM content limitation shall notify the Illinois EPA:

- i. Of a violation of the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation;
 - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(a)(1) above. Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(a) above.
23. 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

Telephone: 217/782-5811 Fax: 217/782-6348

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

Telephone: 847/294-4000

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: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from this 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 of VOM 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 less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						<u>Total HAPs</u>
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>	<u>Single HAP</u>	
Boilers	24.4	29.0	2.20	0.2	1.6		
Dry Flour Casing Line			6.90				
Dry Flour Cutting Line			12.50				
Dry Flour Drying Line			11.10				
Tobacco Dryer			0.44		2.29		
Paper Can			29.50				
Weigh Room			3.90				
First Pickle/Curing/Cure							
Turning/Finishing/Flavor							
Coaters/Fluidizer-Coaters					21.73		
Solvent Wipe Cleaning	-----	-----	-----	-----	3.90	7.9	19.9
Totals	<u>24.4</u>	<u>29.0</u>	<u>66.54</u>	<u>0.2</u>	<u>27.23</u>	<u>7.9</u>	<u>19.9</u>

GMK:psj