

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

E. A. Allen Lumber Co.
Attn: Mr. Ken Ford
117 East Industrial Drive
Post Office Box 290
Momence, Illinois 60954

Application No.: 99030006

I.D. No.: 091065ABG

Applicant's Designation: FLOW COATERS

Date Received: November 9, 2005

Subject: Flow Coating of Lumber Siding

Date Issued:

Expiration Date:

Location: 117 East Industrial Drive, Momence

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five flow coating lines and a 500 gallon gasoline storage tank 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 of VOM, 10 tons/year for a single HAP and 25 tons/year for combined 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.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. 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 the requirements of 35 Ill. Adm. Code 212.122, 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 212.321(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 subsection (c) of 35 Ill. Adm. Code 212.321.

- 3a. Pursuant to 35 Ill. Adm. Code 215.122(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, submerged fill, or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 215.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 215.121(b)(2).
- b. Pursuant to 35 Ill. Adm. Code 215.301, 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 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.
- c. 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.
- 4a. Operations and emissions from the five coating lines, including all clean-up operations, shall not exceed the following limits:

VOM Usage and Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
9.9	99
Single HAP Usage and Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
0.9	9.0
Total HAP Usage and Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
2.25	22.5

- b. This permit is issued based on negligible emissions of particulate matter from the affected coating lines. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
- c. These limits are based on all VOM and HAPs from each material used being emitted and not reclaimed.
- 5. Emissions and operation of the 500 gallons gasoline storage tank shall not exceed the following limits:

Gasoline Throughput		VOM Emissions	
<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
2,900	29,000	0.05	0.44

These limits are based on maximum operating rate and the use of TANKS program Version 4.0.

6. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit.
7. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 8a. 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.
- b. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

- i. Usage and type of each material, including all clean-up solvents (gallons/month and gallons/year);
 - ii. Density of each material (lbs/gallon);
 - iii. VOM and HAP content of each material (lbs/gallon or weight %);
and
 - iv. Monthly and annual VOM, single HAP and total HAPs emissions (tons/month and tons/year), with supporting calculations.
9. 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.
10. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
11. 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

Page 5

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

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

ECB:RBS:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating 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 is handling over 100,000 gallons total for all paints and solvents. The resulting maximum emissions are below the levels (e.g., 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined 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, coatings used and control measures are more effective than required in this permit.

<u>Equipment</u>	E M I S S I O N S		
	<u>VOM</u> <u>(Tons/Year)</u>	<u>Single HAP</u> <u>(Tons/Year)</u>	<u>Total HAPs</u> <u>(Tons/Year)</u>
Coaters	99.00	9.0	22.5
Storage Tank	<u>0.44</u>	<u> </u>	<u> </u>
Totals	99.44	< 10	< 25

ECB:RBS:psj