

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Rycoline Products, Inc.  
Attn: Edward Toliopoulos  
5540 Northwest Highway  
Chicago, Illinois 60630

Application No.: 95120197

I.D. No.: 031600FXP

Applicant's Designation: CONOP1097

Date Received: July 31, 2003

Subject: Printing Materials Manufacturing Plant

Date Issued:

Expiration Date:

Location: 5540 Northwest Highway, Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of twenty-one storage tanks and twenty-one mixing 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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). As a result, the source is excluded from the requirements 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.
2. This permit is issued based upon the plant not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart PP: Miscellaneous Fabricated Product Manufacturing Processes. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year.
- 3a. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device [35 Ill. Adm. Code 218.122(b)].
- b. If no odor nuisance exists the limitation of Conditions 3(a) shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) (35 Ill. Adm. Code 218.122(c)).

4. Total VOM emissions from the plant operations shall not exceed 22.7 ton/yr as specified below:

a. VOM emissions from the organic liquids storage tanks operations shall not exceed the following limits: 320 lb/mo, 1.6 ton/yr.

VOM emissions from the operations of storage tanks shall be calculated using equations given by AP-42 (5th edition, Section 7.1) and utilized in the USEPA distributed computer programs TANKS.

b. Operations and VOM emissions from the mixing tanks shall not exceed the following limits:

VOM Throughput		VOM Emissions	
(T/Mo)	(T/Yr)	(T/Mo)	(T/Year)
550	5,500	1.7	16.5

The VOM emissions from the mixing operations shall be calculated using the following equation:

$$E = \Sigma(S_i \times V_i) \times EF, \text{ Where:}$$

$S_i$  - Solvent usage (tons);

$V_i$  - VOM content of solvent (fraction);

EF - Emission Factor. EF = 0.3%

c. This permit is issued based upon no organic solvents are used for the cleanup operations and no ink milling operations are performed.

d. Fugitive VOM emissions from the plant operations shall not exceed 4.6 ton/yr. It shall be calculated using USEPA SOCOMI factors (EPA-453/R-95-017).

e. These limits define the potential emissions of the VOM and are based on the maximum allowable VOM throughput.

f. 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.

5. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Solids Throughput		Emissions of Particulate Matter	
	(T/Mo)	(Ton/Yr)	(T/Mo)	(Ton/Yr)
21 Mixing Tanks (Total)	70	700	0.7	7.0

These limits are based on the maximum production rate and standard emission factors for solids handling of 1%. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. The emissions of Hazardous Air Pollutants (HAP) 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 Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
7. The Permittee shall maintain monthly records of the following items:
  - a. Names and amount of VOM and HAP-containing raw materials used (ton/mo, ton/yr);
  - b. VOM and HAP content in the raw materials (wt. %);
  - c. VOM and HAP emission calculations (ton/mo, ton/yr); and
  - d. Separate emission records for each individual HAP with emission rate exceeding 0.8 ton/mo.
8. The Permittee shall maintain readily accessible records of the dimension of the storage vessels and an analysis of the capacity of the storage vessels. These records shall be kept for the life of the source [35 Ill. Adm. Code 218.129(e) and (f)].
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three 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 the Illinois EPA or USEPA request for records during the course of a source inspection.
10. 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, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.
11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:

- i. Names and amount of VOM-containing raw materials used (tons/yr) and their VOM and HAP content (wt. %) from the prior calendar year;

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

12. 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 - Regional Office  
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: IEPA, FOS Region 1  
IEPA, Compliance and Enforcement Section  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Printing Materials Manufacturing Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is use of 5,500 tons of VOM in raw materials per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per 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 material is handled, and control measures are more effective than required in this permit.

1. VOM emissions from the plant operations:
  - a. VOM emissions from the organic liquids storage tanks operations:

320 lb/mo, 1.6 ton/yr
  - b. VOM emissions from the mixing tanks:

1.7 ton/mo, 16.5 ton/yr
  - c. Fugitive VOM emissions from the plant operations shall not exceed 4.6 ton/yr.
2. The emissions of Hazardous Air Pollutants (HAP) 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 Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
3. Emissions of particulate matter from the solids handling operations shall not exceed the following limits:

0.7 ton/mo, 7.0 ton/yr

DES:VJB: