

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Russell T. Bundy Associates, Inc. D/B/A Pan-Glo
Attn: Scott Mouton
417 East Water Street
Post Office Box 150
Urbana, Ohio 43078

Application No.: 92060055 I.D. No.: 197085AAS
Applicant's Designation: IEPAAP1111 Date Received: August 13, 1999
Subject: Used Baking Pan Cleaning and Coating Line
Date Issued: November 5, 1999 Expiration Date: April 4, 2001
Location: Unit #3, 800 Moen Avenue, Rockdale

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of various processes for straightening and cleaning used baking pans, a coating line with drying and curing ovens for coating such pans with coating drying process vented to a thermal oxidizer with a filter on one vent and several burners 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)). 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.
2. The drying oven in conjunction with the pan coater shall be operated to meet the requirements of a permanent total enclosure (PTE) as described in 35 Ill. Adm. Code 218, Appendix B Procedure T.
- 3a. i. Whenever the control system for the pan coating line is operated, the minimum VOM destruction efficiency of the thermal oxidizer shall be 90% and minimum overall control for the entire pan coating line shall be 81% pursuant to 35 Ill. Adm. Code 218.207(b)(1).

- ii. In order to comply with this requirement the thermal oxidizer flame zone shall be heated to the manufacturer's recommended temperature but not lower than 1400 degrees F, before the coating process is begun and this temperature shall be maintained during the coating process.
- b. Thermal oxidizer flame zone shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the thermal oxidizer temperature. The Permittee shall retain all records of equipment operation and strip charts or disk storage for at least one year from the date of occurrence. These records shall be available for inspection by the Illinois EPA or USEPA.
- c. The Permittee shall operate the afterburner from January 1 to November 30, as indicated in the application.
- 4a. The pan coating operation shall not coat more than 100,000 pans per month.

- b. i. Use of glaze, which contains VOM as received, solvent added to the glaze prior to use, VOM content of glaze and density of added solvent, and uncontrolled VOM emissions shall not exceed the following:

<u>Component</u>	<u>Uncontrolled VOM Usage</u>	
	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Glaze	6,154	36.93
Solvent	<u>3,625</u>	<u>21.75</u>
Total	9,779	58.68

- ii. VOM emissions from VOM in both glaze and solvent combined after use of required control equipment shall not exceed the following:

<u>Time Period</u>	<u>VOM Emissions^a</u>	
	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
January-November	1,858	10.21
January-November Oxidizer Malfunction ^b		0.90
December	9,779	<u>4.89</u>
Total		16.00

^a After 81% control for months of January through November pursuant to Condition 3.

^b Malfunction or breakdown of thermal oxidizer pursuant to Condition 6.

- c. Glaze and solvent usage may be interchanged provided that total VOM emissions meet the limit in the above table.
- 5a. Emissions of any Hazardous Air Pollutant (HAP) as listed pursuant to Section 112(b)(1) of the CAA shall not exceed 9 tons/yr and total HAPs shall not exceed 22.5 tons/yr.
- b. The Annual Emission Report required by 35 Ill. Adm. Code 201.302 and Part 254 shall include a statement of HAP emissions by compound.
- 6. Operation of the coating line during malfunction or breakdown of the thermal oxidizer is allowed provided that the following requirements or circumstances are met.
 - a. The Permittee shall maintain an inventory of critical spare parts for the thermal oxidizer, its capture system, and monitoring devices.
 - b. The coater shall be immediately shutdown upon initial failure of the thermal oxidizer but the coater may be restarted after three hours if the thermal oxidizer has not been repaired within that time period.
 - c. Operation of the coater without the thermal oxidizer is allowed for a maximum of 28 hours for one incident and 50 total hours per year.
 - d. Emissions of VOM during malfunction or breakdown of the thermal oxidizer shall not exceed 35.1 lb/hr or 0.9 ton/yr.
 - e. This condition supersedes standard Condition 9a. The Permittee shall maintain the records required by standard Condition 9b.
 - f. The Annual Emission Report shall include a separate section for emissions during malfunction or breakdown.
- 7. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the proceeding 11 months.
- 8a. The raw materials used on the cleaning operations listed in Condition 8b shall contain negligible VOM, i.e., less than 0.1 lb/gal.
- b. This permit is issued based on negligible emissions of all contaminants from the lead melting pot, soak tank, clean and deglaze tank, bleach tank, acid neutralization tank, and the conveyORIZED pan washer. For this purpose emissions of each contaminant shall not exceed nominal emission rates of 0.05 lb/hr and 0.22 ton/yr.

9. VOM and HAP contents may be determined from material safety data sheet (MSDS). HAP emissions shall be determined using the same destruction efficiency as for VOM.
- 10a. The Permittee shall maintain records of the following items pursuant to the requirement of 35 Ill. Adm. Code 218.211(e).
 - i. Thermal oxidizer flame zone temperature (EF).
 - ii. Log of operating times for PTE, thermal oxidizer and flame zone temperature monitor.
 - iii. Maintenance log for capture and control system.
- b. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in Special Conditions 3 and 4.
 - i. Glaze coating usage and VOM content (gal/mo).
 - ii. Solvent usage (gal/mo).
 - iii. VOM usage (lb/month and ton/year).
 - iv. VOM emissions (lb/month and ton/year).
 - v. HAP usage and emissions (ton/month and ton/year).
 - vi. Natural gas usage and hours of operation of boilers and dryers/ovens.
- c. These records shall be retained for three years and shall be available for inspection by the Illinois EPA.
11. 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 an Illinois EPA or USEPA request for records during the course of a source inspection.
12. If there is an exceedance of 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 Unit in Springfield, Illinois within 30 days after the exceedance. 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 violation and efforts to reduce emissions and future occurrences.

13. 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)
 1340 North Ninth Street
 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
 Eisenhower Tower
 1701 South First Avenue
 Maywood, Illinois 60153

14. Heat input and hours of operation of the five pan drying and curing ovens (PD/CO) and emissions of nitrogen oxides shall not exceed the following:

<u>Equipment</u>	<u>Heat Input (mmBtu/Hr)</u>	<u>Operation</u>			<u>NO_x Emissions</u>	
		<u>(Hr/Day)</u>	<u>(Day/Wk)</u>	<u>(Wk/Yr)</u>	<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>
PD/CO #1	1.2	12	5	52	0.12	.18
PD/CO #2 & #3	0.8	16	5	52	0.08	.17
PD/CO #4 & #5	0.75	16	5	52	0.075	.16

These limits are based on the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

15. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- a. Glaze coating usage (gallons/yr);
 - b. VOM content (lb VOM/gallon);
 - c. Solvent usage (gallons/yr); and
 - d. Natural gas usage (mmscf/yr).

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It should be noted that this permit has been revised to change the throughput and afterburner usage.

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

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

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cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
USEPA

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. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM 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.

1a. Emissions of volatile organic material (VOM) shall not exceed 16.0 tons/yr as determined below.

b. i. Use of glaze, which contains VOM as received, solvent added to the glaze prior to use and uncontrolled VOM usage shall not exceed the following:

<u>Component</u>	<u>Uncontrolled VOM Usage</u>	
	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
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Total	9,779	58.68

ii. VOM emissions from VOM in both glaze and solvent combined after use of required control equipment shall not exceed the following:

<u>Time Period</u>	<u>VOM Emissions^a</u>	
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^b Malfunction or breakdown of thermal oxidizer pursuant to Condition 6.

c. Glaze and solvent usage may be interchanged provided that total VOM emissions meet the limit in the above table.

2. Emissions of any Hazardous Air Pollutant (HAP) as listed pursuant to Section 112(b)(1) of the CAA shall not exceed 9 tons/yr and total HAPs not exceed 22.5 tons/yr. HAP emissions shall be determined from percent HAP'S in glaze and solvent and same calculations as for VOM in No. 1 above.

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Illinois Environmental Protection Agency
Division of Air Pollution Control
1340 N. Ninth Street
Springfield, Illinois
January, 1996

Statement of Basis
For Proposed Issuance of
A Federally Enforceable State Operating Permit for
Ekco/Glaco Ltd.

Applicant:

Name: Ekco/Glaco, Ltd.
Address: 800 Moen Avenue, Unit #3
Rockdale, Illinois 60436

Contact Person: Jerry Messer
Contact Person Phone: 815/729-0116

Project:

Project: Used Baking Pan Cleaning and Coating Line
Project Location: 800 Moen Avenue (Unit #3), Rockdale

Plant Name: Ekco/Glaco Ltd.
Location Identification Number: 197085AAS
Application Number: 92060055

Significant Dates:

Application Received: October 3, 1994
Comment Period Begins: January , 1996
Comment Period Ends: March , 1996

Illinois EPA Contacts:

Permit Section - Name: Dan Punzak
Address: 1340 N. Ninth Street
P.O. Box 19506
Springfield, Illinois 62794-9506
Telephone: 217/782-2113

Telecommunications Device for Deaf: 217/782-9143

Field Operations Section - Name: Jose Mora
Address: 1701 First Avenue
Maywood, Illinois 60153
Telephone: 708/338-7900

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PROJECT SUMMARY

I. INTRODUCTION

An application has been voluntarily submitted by Ekco/Glaco, Ltd. in order to voluntarily incorporate federally enforceable limits. These limits would prevent this facility from being a major source or emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by record keeping and reporting requirements to assure that the facility is operated as a non-major source. These conditions would be enforceable by both the State of Illinois and USEPA.

II. SOURCE DESCRIPTION

Ekco/Glaco, Ltd. operates a baking pan cleaning and re-coating facility, servicing area commercial bakeries, which cleans and re-coats baking pans with a silicone release coating. Commercial baking pans which are soiled with bakery oils and greases and/or whose release coating has dissipated are brought to the facility for cleaning and re-coating. On receipt, pans are loaded into expanded metal baskets and submerged in caustic cleaning solutions to remove oil, grease and the old silicone coating. After cleaning the pans are rinsed and run through a clear water conveyORIZED washer and dried.

The dried pans are spray coated with Dow Corning 1-2531 Release Coating in a conveyORIZED spray machine. After coating the pans are cured at 425 - 450N for one to two hours to polymerize the coating. Emissions from the coater and oven are vented to a thermal oxidizer. The coater/oven were tested and shown to have permanent total enclosure, i.e., so that all of the fumes are vented to the oxidizer. The oxidizer is only required to be operated during the ozone season, April - October.

After curing the pans are re-stacked on pallets or dollies and returned to the bakery.

The purpose of the silicone release coating is to assist in the release of the baked product from the baking pan in order to eliminate sticking and tearing away of part of the baked products which would make it unsaleable.

III. EMISSIONS

The principal air contaminant of concern for this facility is volatile organic material (VOM) from the Dow Corning 1-2531 coating and the dilution solvent used to formulate the coating. Dow Corning 1-2531 contains 20% silicone resin and 80% VOM of which 16% is toluene, a listed HAP. The total VOM is 5.8 lb/gal of coating. The dilution solvent which is specially formulated for this purpose is considered to be 100% VOM (6.7 lb/gal) of which 19% is toluene.

Since this facility provides a service to area bakeries and the bakeries have their pans processed during downtimes, there are not set processing days or hours. Pans are processed when the bakery makes them available. Under normal circumstances pans are processed on Monday, Tuesday, Friday and Saturday with coating machine operating approximately 18 - 22 hours per week.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with Illinois Pollution Control Board emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. This site readily complies with all applicable Board standards.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on the amount of release coating used. These limitations are consistent with the historical operation of the operation and are based on the VOM content of the release coating and the proposed maximum usage of these limits.

The permit conditions also establish appropriate compliance procedures, including inspection practices, record keeping requirements, and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the coating operation is operating within the limitations set by the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois Environmental Protection Agency's preliminary determination that this re-coating operation meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois Environmental Protection Agency is therefore proposing to issue a permit with federally enforceable limits for this operation.

Comments are requested on this proposed action by the Illinois Environmental Protection Agency and the proposed conditions on the draft permit. Comments must be postmarked by March , 1996 and addressed to:

Illinois Environmental Protection Agency
Attn: Dan Punzak
Division of Air Pollution Control - Permit Section
2200 Churchill Road, P.O. Box 19506
Springfield, Illinois 62794-9506
Phone: 217/782-2113

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If substantial public concern is shown in this matter, the Illinois Environmental Protection Agency will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

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217/782-2113

April 7, 1998

Russel T. Bundy Associates, Inc. D/B/A Pan-Glo
Attn: Scott Mouton
417 East Water Street
Post Office Box 150
Urbana, Ohio 43078

I.D. No.: 197085AAS

Dear Mr. Mouton:

Enclosed is a revised permit letter which reflects only a change of ownership. Please note that if you have changed or intend to change this operation it will be necessary to apply for revision of your air pollution permit(s).

If you have any questions or require any assistance concerning these matters, contact Tim Mabe at 217/782-2113.

Very truly yours,

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

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Enclosure

cc: Region 1
I.D. File
Permit File