

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE

PERMITTEE

Surface Guard, Inc.
Attn: Patrick Dillon
515 North Enterprise Street
Aurora, Illinois 60504

Application No.: 05040029

I. D. No.: 043407AAI

Applicant's Designation:

Date Received: April 15, 2005

Subject: Masking Tape Manufacturing

Date Issued: June 28, 2007

Expiration Date: June 28, 2012

Location: 515 North Enterprise Street, Aurora, DuPage County

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five paper and film adhesive coating lines and one flexographic printing line 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 air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic materials (VOM)). 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.
 - ii. To limit the potential 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.
 - iii. To limit the emissions of VOM from the construction of new emission units and other modifications at the source, which occurred without first obtaining construction permit(s) between November 15, 1992 and June 15, 2005 (the period during which the Chicago area was classified as severe nonattainment for ozone), to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification.
 - iv. This permit is issued based upon the source not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart H: Printing And Publishing. This is consequence of the federally enforceable production and operating limitations, which restrict

the maximum theoretical emissions of VOM from all flexographic and rotogravure printing line(s) (including solvents used for cleanup operations associated with flexographic and rotogravure printing line(s)) to less than 100 tons per year and the potential to emit for VOM to less than 25 tons per year.

- 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.
- 2a. The paper coating lines are subject to the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations 40 CFR 60, Subparts A and RR. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.440(b), any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR 60 Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR 60 Subpart RR.
 - c. The Permittee shall fulfill the monitoring and recordkeeping requirements of the New Source Performance Standards, 40 CFR 60.445(d): to maintain a 12 month record of the amount of solvent applied in the coating at the facility.
 - d. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 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 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. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or

storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.

- c. 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.
 - i. 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.
 - ii. 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.
- d. 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 this Subpart, 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.
- e. 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.
- 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 source to excess 2000 ppm.
- 5a. The paper coating operations performed at the facility are subject to the following emission limitations of 35 Ill. Adm. Code 218.204(c) expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. The emission limitations are as follows:

	<u>kg/l</u>	<u>lbs/gal</u>
Paper Coating	0.28	(2.3)

- b. The Permittee has elected compliance with provisions of 35 Ill. Adm. Code 218.205(a) rather than 218.204: No owner or operator of a coating line subject to the limitations of Section 218.204 of this Subpart shall apply coatings on any such coating line, during any day, whose daily-weighted average VOM content exceeds the emission limitation to which the coatings are subject.
- c. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- 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 unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 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. In the event that the operation of this source 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 nuisance.

7a. The VOM emissions from coating, printing and clean-up operations shall not exceed 1.5 tons/month and 14.8 tons/year.

b. The emissions of VOM shall be determined from the following equation:

$$E = \Sigma(S_i \times C_i) - \Sigma(W_k \times C_k),$$

where:

E - VOM emissions (tons)

S_j - Adhesive, ink and clean-up solvent usage (tons)

C_j - VOM content of the adhesives, inks and solvents (weight fraction)

W_k - Certified amount of waste solvent sent off for disposal (tons)

C_k - Certified VOM content of waste solvent (weight fraction)

c. 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).

8. This permit is issued based on the potential to emit (PTE) for hazardous air pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act being less than 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.

9a. Pursuant to 35 Ill. Adm. Code 212.107, 212.109, and 212.110, testing for particulate matter emissions shall be performed as follows:

i. 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, incorporated by reference in 35 Ill. Adm. Code 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301, pursuant to 35 Ill. Adm. Code 212.107.

ii. 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, incorporated by reference in 35 Ill. Adm. Code 212.113, 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, pursuant to 35 Ill. Adm. Code 212.109.

- iii. 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, pursuant to 35 Ill. Adm. Code 212.110(a).
 - iv. 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, pursuant to 35 Ill. Adm. Code 212.110(b).
 - v. 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, pursuant to 35 Ill. Adm. Code 212.110(c).
- b. Testing required by Condition 9(a) shall be performed by a qualified independent testing service.
10. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
- 11a. 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. Pursuant to 40 CFR 60.445(d), the owner or operator of an affected facility operating at the conditions specified in 40 CFR 60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.
- c. 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.
- d. Pursuant to 35 IAC 218.211(d)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.205 shall collect and record 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 the coating lines.
 - 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.
 - iii. The daily-weighted average VOM content of all coatings as applied on each coating line calculated in accordance with equation in Section 211.1670:

$$VOM_w = \left[\sum_{i=1}^n V_i \times C_i \right] / V_T$$

VOM_w - The average VOM content of two or more coatings as applied each day on a coating line in units of kg VOM/liter (lbs VOM/gallon) of coating (minus water and any compounds which are specifically exempted from the definition of VOM),

- n - The number of different coatings as applied each day on a coating line,
 - V_i - The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of liters (gallons).
 - C_i - The VOM content of each coating as applied each day on a coating line in units of kg VOM/liter (lbs VOM/gallon) of coating (minus water and any compounds which are specifically exempted from the definition of VOM), and
 - V_T - The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of liters (gallons).
- e. Pursuant to 35 Ill. Adm. Code 218.404(b) (2), any owner or operator of a printing line which is exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 shall collect and record all of the following information each year for each printing line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating and ink as applied on each printing line.
 - ii. The VOM content and the volume of each coating and ink as applied each year on each printing line.
- f. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Names and amount of coatings, inks and solvents used (tons/month and tons/year) and their VOM and HAP content (weight %);
 - ii. VOM input from the coatings to the process (tons/month, tons/year);
 - iii. Certified amount of waste solvent shipped off (tons/month, tons/year) and its VOM content (fraction);
 - iv. Monthly and annual VOM and HAP emissions with supporting calculations (tons/month, tons/year).
12. 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 the Illinois EPA or USEPA request for records during the course of a source inspection.

13. 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.
- 14a. Pursuant to 35 Ill. Adm. Code 218.211(c) (3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 of and complying by means of 35 Ill. Adm. Code 218.204 shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record 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 from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) (1) or (e) (1), respectively. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), respectively.
- b. Pursuant to 35 Ill. Adm. Code 218.404(b) (3), any owner or operator of a printing line which is exempted from the limitations of 35 Ill. Adm. Code 218.401 because of the criteria in 35 Ill. Adm. Code 218.402 shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the
15. 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.

16. 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

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

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

ECB:VJB:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the Masking Tape 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. The resulting maximum emissions are below the levels (e.g., 100 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 material is handled, coatings used and control measures are more effective than in this permit.

<u>Emission Units</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAP</u>
Coating and Printing Lines	14.8	< 10	< 25

ECB:VJB:psj