

PROPOSED PERMIT
Bretford Manufacturing
I.D. No.: 031096AKZ
Application No.: 95120185
November 29, 1999

² Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Bretford Manufacturing, Inc.
11000 Seymour Avenue
Franklin Park, Illinois 60131
847/678-2545

I.D. No.: 031096AKZ
Standard Industrial Classification: 2521, Manufacturing Industry

1.2 Owner/Parent Company

Bretford Manufacturing
11000 Seymour Avenue
Franklin Park, Illinois 60131

1.3 Operator

Bretford Manufacturing
11000 Seymour Avenue
Franklin Park, Illinois 60131

Dale Guenther, Environmental Coordinator
847/678-2545 Ext. 335

1.4 General Source Description

Bretford Manufacturing is located at 11000 Seymour Avenue in Franklin Park, Illinois. The source is a manufacturer of office and institutional furniture. The following processes exist at the source: woodworking operations, wood coating, metal product line, and a projection screen and dry erase board production line. The woodworking operations take wood panels and cut, rout, drill, profile, groove, and sand the panels to produce the desired parts. The wood parts are then coated using one or more of the eight paint spray booths. The metal product line consists of phosphate washing, oven drying, powder paint booths, bake oven, and finally a burn off oven for cleaning the conveyor hooks. The projection screen and dry erase board production line consists of 2 paint spray booths. Gluing operations consist of 2 glue spray booths and several other miscellaneous pieces of equipment. The source also operates three boilers (one boiler is wood fired) to provide building and process heat.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon monoxide
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic feet
gal	gallons
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilograms
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mg	megagrams
mmBtu	million British thermal units
mmscf	million standard cubic feet
mo	month
MW	megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute

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RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T	tons
TOC	Total Organic Carbon
T1	Title I - identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt. %	weight percent
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Fugitive VOM emissions from thinner used for cleaning in assembly areas.

Two Kewanee natural gas fired boilers (7.27 and 6.84 mmBtu/hr)

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Molders, shapers, and routers used in Rough Mill; phosphate metal parts washer and a drying oven with emissions that never exceed 0.1 lb/hr or 0.44 tons/year of any regulated pollutant in the absence of air pollution control equipment and that do not emit any pollutant listed as hazardous pursuant to Section 112(b) of the Clean Air Act.

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

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3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Group 1 Coating Operations	8 Paint Spray Booths	1984, 1996	Waterwash and Filters
	3 Powder Coating Lines	1995	
	3 UV Booths	1998	
Group 2 Gluing Operations	2 Glue Spray Booths and Additional Manual Gluing Devices	1986, 1991, 1992, 1993	None
Group 3 Woodworking Operations	Sanding, Sawing, Cutting, and Grinding	1996-1992, 1990, 1984	2 Filters and 5 Dust Collectors
Group 4 Boiler	Wood Fired Fuel Combustion Units	1996	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. 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 overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. 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 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting

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substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.5 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

This permit is issued based on the source not being subject to 40 CFR 63, Subpart JJ, because the source is not a major source of HAPs. (See also Condition 5.5.2.)

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following

source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all significant emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	112.98
Sulfur Dioxide (SO ₂)	0.09
Particulate Matter (PM)	21.88
Nitrogen Oxides (NO _x)	6.45
HAP, not included in VOM or PM	---
TOTAL	141.40

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart JJ -

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National Emission Standards for Wood Furniture
Manufacturing Operations do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

- a. The annual emissions from paint spray booths 7 and 8, all gluing operations covered in condition 7.2, and the 3 powder coating lines, including all cleanup emissions associated with these processes, shall not exceed the following limitations:

<u>Pollutant</u>	<u>Emissions (tons/year)</u>	<u>Underlying Rule</u>
VOM	24.9	35 IAC Part 203

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) [T1R].

- b. The annual emissions from paint spray booths 7 and 8, the 3 UV booths, and the 3 powder coating lines, including all cleanup emissions associated with these processes, shall not exceed the following limitation:

<u>Pollutant</u>	<u>Emissions (tons/year)</u>	<u>Underlying Rule</u>
VOM	24.9	35 IAC Part 203

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) [T1R].

- c. The annual emissions from paint spray booths 1-6, the 3 UV booths, and all gluing operations covered in Condition 7.2, including all cleanup emissions associated with these processes, shall not exceed the following limitation:

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<u>Pollutant</u>	<u>Emissions (tons/year)</u>	<u>Underlying Rule</u>
VOM	99.9	35 IAC Part 203 35 IAC 218 Subpart PP

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) [T1R].

- d. The limitations in Conditions 5.5.3(a), (b), and (c) contain revisions to previously issued Permits 86080010 and 98120058. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Significant Deterioration (PSD). 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 CAAPP application contains the most current and accurate information for the source. Specifically, the company is taking overall emission limits instead of individual ones [T1R].

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to verify that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63, Subpart JJ, and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5.2:

- a. Records maintained on a monthly basis for the previous month:
 - i. Total usage of each individual HAP, and total combined HAPs from the source, tons/month; and
 - ii. Total emissions of each individual HAP, and total combined HAPs from the source, tons/month, with supporting calculations.

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section

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39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and
- b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM and HAP Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

- a. Compliance of each coating with the VOM emission limitations in Condition 7.1.3 shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formulae listed below:

$$\text{Coating VOM Emissions} = V \times D \times U$$

Where:

V = Percent VOM in the coating (wt. %)

D = Overall coating density (lb/gal)

U = Overall coating usage (gal/mo and gal/yr)

$$\text{Cleaning Solvent VOM Emissions} = V_1 \times D_1 \times U_1$$

Where:

V₁ = Percent VOM in the cleaning solvent (wt. %)

D₁ = Overall cleaning solvent density (lb/gal)

U₁ = Overall cleaning solvent usage (gal/mo and gal/yr)

VOM Waste = lb waste x percent VOM in the waste (wt. %)

$$\text{Total VOM Emissions} = \text{Coating Emissions} + \text{Cleaning Solvent Emissions} - \text{VOM Waste}$$

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

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To determine compliance with Conditions 5.5.1, 7.2.3, and 7.2.6, VOM emissions from the affected gluing operation shall be calculated based on the following:

$$\text{Adhesive VOM Emissions} = V \times D \times U$$

Where:

V = Percent VOM in the adhesive (wt. %)

D = Adhesive density (lb/gal)

U = Adhesive usage (gal/mo and gal/yr)

$$\text{Cleaning Solvent VOM Emissions} = V_1 \times D_1 \times U_1$$

Where:

V₁ = Percent VOM in the cleaning solvent (wt. %)

D₁ = Overall cleaning solvent density (lb/gal)

U₁ = Overall cleaning solvent usage (gal/mo and gal/yr)

$$\text{Total VOM Emissions} = \text{Coating Emissions} + \text{Cleaning Solvent Emissions}$$

- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

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6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
- i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for

such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

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- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual

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Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

- i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a. i. The allotment of ATUs to this source is 304 ATUs per seasonal allotment period.

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- ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 34.536 tons.
 - A. This determination includes use of the 1993 and 1997 seasons as substitutes for the 1994, 1995, and 1996 seasons due to non-representative conditions in these seasons as allowed by 35 IAC 205.320(a).
 - B. This determination also includes adjustment to actual emissions to account for voluntary over-compliance at the source, e.g., using coatings with VOM contents lower than what is required by 35 IAC Part 218 Subpart F, pursuant to 35 IAC 205.320(d) as further addressed in Section 7 of this permit.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units
- Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

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- ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and

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iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

1 Wood Fired Boiler

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Paint Spray Booths
 Control 01 - Paint Filters and Water Wash

7.1.1 Description

The Permittee is a manufacturer of wood and metal products. Coating operations are conducted with paint spray booths (controlled by waterwashes or filters), conveyORIZED flash-off ovens, and cleanup solvents.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Control Equipment
01	CL-1 Paint Spray Booths 1 & 2	Water Wash with Filter
	CL-3 Paint Spray Booths 3 & 4	Water Wash with Filter
	CL-5 Paint Spray Booth 5	Paint Filter
	CL-6 Paint Spray Booth 6	Paint Filter
	CL-7 Paint Spray Booths 7 & 8	Paint Filters
	3 Powder Coating Lines	-----
	3 UV Booths	Paint Filters

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected wood paint spray booth" for the purpose of these unit specific conditions is a coating operation that includes a spray booth which is used to apply coating to wood. The coating is then dried in a flash-off oven or UV curing station. As of the "date issued" as shown on page 1 of this permit, the affected paint spray booths are identified in Condition 7.1.2.

- b. An "affected metal paint spray booth" for the purpose of these unit specific conditions is a coating operation that includes a paint spray booth or powder coating booth which is used to apply coating to metal, which is then air dried. As of the "date issued" as shown on page 1 of this permit, the affected paint spray booths are the border paint spray booths 7 and 8 and the powder coating lines.

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- c. An "affected fabric paint spray booth" for the purpose of these unit specific conditions is a coating operation that includes a paint spray booth which is used to apply coating to fabric, which is then air dried. As of the "date issued" as shown on page 1 of this permit, the affected paint spray booths are the border paint spray booths 7 and 8.
- d. An "affected vinyl paint spray booth" for the purpose of these unit specific conditions is a coating operation that includes a paint spray booth which is used to apply coating to vinyl, which is then air dried. As of the "date issued" as shown on page 1 of this permit, the affected paint spray booths are the border paint spray booths 7 and 8.
- e. Each affected paint spray booth (wood, metal, fabric, and vinyl) at the source is subject to 35 IAC 212.321(a), which requires that:
 - i. 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, 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 IAC 212.321 [35 IAC 212.321(a)].
 - ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected paint spray booths shall not exceed the allowable emission rates specified in the following equation

$$E = A(P)^B$$

Where:

P = Process weight rate; and,
E = Allowable emission rate; and,

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1. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

- f. Each affected wood paint spray booth at the source is subject to 35 IAC 218.204(1)(1-4) for wood furniture coatings which provides that:

- i. On or after March 15, 1998, wood furniture sealers and topcoats must comply with one of the limitations specified below:

<u>Coatings</u>	<u>kg VOM/ kg solids</u>	<u>lb VOM/ lb solids</u>
Topcoat	0.8	0.8

Sealers and Topcoats
 with the Following
 Limits:

A. Non-Acid-Cured Alkyd Amino Vinyl Sealer	1.9	1.9
B. Non-Acid-Cured Alkyd Amino Conversion Varnish	1.8	1.8

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- C. Acid-cured 2.3 2.3
 Alkyd Amino
 Vinyl Sealer
- D. Acid-cured 2.0 2.0
 Alkyd Amino
 Conversion Varnish

ii. On or after March 15, 1998, wood furniture coatings must comply with the limitations specified below:

<u>Coatings</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Opaque Stain Non-Topcoat	0.56	4.7
Pigmented Coat	0.60	5.0
Repair Coat	0.67	5.6
Semi-Transparent Stain	0.79	6.6
Wash coat	0.73	6.1

iii. On or after March 15, 1998, wood furniture coatings must comply with the limitations specified below:

- A. No source subject to the limitations of 35 IAC 218.204 (1)(1,2,or 3) and utilizing one or more wood furniture coating spray booths shall use strippable spray booth coatings containing more than 0.8 kg VOM/kg solids (0.8 lb VOM/lb solids), as applied.
- B. Any source subject to the limitations of 35 IAC 218.204 (1)(1,2, A or B) and utilizing one or more continuous coaters shall, for each continuous coater, use an initial coating which complies with the limitations of 35 IAC 218.204 (1)(1,2, A or B). The viscosity of the coating in each reservoir shall always be greater

than or equal to the viscosity of the initial coating in the reservoir. The owner or operator shall:

1. Monitor viscosity of the coating in the reservoir with a viscosity meter or by testing the coating in the reservoir each time solvent is added.

[35 IAC 218.204]

g. Each affected metal paint spray booth at the source is subject to 35 IAC 218.204(j) for metal coatings which provides that:

- i. No owner or operator of an affected paint spray booth shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products. The following emission limitation is 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:

<u>Coatings</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
A. Clear Coating	0.52	4.3
B. Extreme Performance		
Coating Air Dried	0.42	3.5
Baked	0.40	3.3
C. All Other Coatings		
Air Dried	0.40	3.3
Baked	0.34	2.8
D. Metallic Coating		
Air Dried	0.42	3.5
Baked	0.36	3.0

E. Definitions

I. For purposes of 35 IAC 218.204(j)(5), the following terms are defined:

1. "Corrosion resistant basecoat" means, for purposes of 35 IAC 218.204(j)(5)(B)(ii), a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance.

2. "Electrodeposition process" means for the purposes of 35 IAC 218.204(j)(5), a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created.

B. For purposes of 35 IAC 218.204(j)(6), "metallic coating" means a coating which contains more than 1/4 lb/gal of metal particles, as applied.

ii. 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 composites.

[35 IAC 218.204]

h. Each affected fabric paint spray booth at the source is subject to 35 IAC 218.204(e) for fabric coatings which provides that:

i. No owner or operator of an affected paint spray booth shall apply at any time any coating in which the VOM content exceeds the

following emission limitations for the coating as applied to fabric. The following emission limitation is 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:

<u>Coatings</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Fabric Coating	0.28	2.3

- ii. 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 composites.

[35 IAC 218.204]

- i. Each affected vinyl paint spray booth at the source is subject to 35 IAC 218.204(f) for vinyl coatings which provides that:

- i. No owner or operator of an affected paint spray booth shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to vinyl. The following emission limitation is 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:

<u>Coatings</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Vinyl Coating	0.28	2.3

- ii. 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 composites.

[35 IAC 218.204]

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7.1.4 Non-Applicable Regulations of Regulations of Concern

- a. No affected paint spray booth (wood, metal, fabric, and vinyl) is subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material which excludes affected paint spray booths from this requirement.
- b. This permit is issued based on the affected wood paint spray booths not being subject to 40 CFR 63, Subpart JJ, because the source is not a major source of HAPs. (See also Condition 5.5.2.).

7.1.5 Operational and Production Limits and Work Practices

- a. Pursuant to 35 IAC 218.217(a), Each owner or operator of an affected wood paint spray booth subject to 35 IAC 218.204 shall not use compounds containing more than 8.0 percent, by weight, of VOM for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.
- b. Pursuant to 35 IAC 218.217(b), Each owner or operator of an affected wood paint spray booth subject to 35 IAC 218.204 shall:
 - i. Keep, store and dispose of all coating, cleaning, and washoff materials in closed containers;
 - ii. Pump or drain all organic solvent used for line cleaning into closed containers;
 - iii. Collect all organic solvent used to clean spray guns in closed containers; and
 - iv. Control emissions from washoff operations by using closed tanks.

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- c. Pursuant to 35 IAC 218.217(c), No owner or operator of an affected wood paint spray booth subject to 35 IAC 218.204 shall use conventional air spray guns to apply coating materials to wood furniture except under the circumstances specified below:
 - i. To apply coating materials that have a VOM content no greater than 1.0 kg VOM/kg solids (1.0 lb VOM/lb solids), as applied;
 - ii. For repair coating under the following circumstances:
 - A. The coating materials are applied after the completion of the coating operation; or
 - B. The coating materials are applied after the stain and before any other type of coating material is applied, and the coating materials are applied from a container that has a volume of no more than 2.0 gallons;
 - iii. If the spray gun is aimed and triggered automatically, rather than manually; or
 - iv. If emissions from the finishing application station are directed to a control device pursuant to 35 IAC 218.216.
- d. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- e. An adequate inventory of spare filters shall be maintained.
- f. The coatings shall be applied with high volume, low pressure, spray equipment.
- g. Equipment for collecting VOM solvent and VOM containing cleaning compounds and minimizing evaporation of VOM to the atmosphere shall be used for the cleanup of mixing, storage, and spray equipment.

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7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected paint spray booths are subject to the following:

Booths 7 and 8 and the powder coating lines shall only coat non-wood furniture products.

7.1.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]

- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected paint spray booth (wood, metal, fabric, and vinyl) shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208, and 218.211(a).
 - i. The VOM content of representative coatings "as applied" on the affected paint spray booth (wood, metal, fabric, and vinyl) shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a)
 - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.

[35 IAC 218.105(a), 218.208, and 218.211(a)]

7.1.8 Monitoring Requirements

The Permittee shall visually inspect the filters and check for pressure drop on a regular basis in order to ensure

proper operation of the filters and the need for replacement.

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each affected paint spray booth to demonstrate compliance with Conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

- a. For each coating and cleaning solvent used on an affected paint spray booth:
 - i. The name and identification number of each coating and cleaning solvent as applied on the affected paint spray booth;
 - ii. The usage of each coating and cleaning solvent on each affected paint spray booth, in units of gallons/month and gallons/year.
 - iii. The weight of VOM per volume of each coating and cleaning solvent (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected paint spray booths.
 - iv. The applicable VOM limit for each applied coating, pursuant to 35 IAC Part 218.204.
 - v. The weight of HAPs per volume of each coating and cleaning solvent (minus water and any compounds which are specifically exempted) as applied each day on the affected paint spray booths.
- b. Records of the testing of VOM and HAP content (wt%) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested,
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and

- iv. Person performing analysis.
- c. The reservoir viscosity and the amount and weight of VOM per weight of solids of coating and solvent each time coating or solvent is added;
- d. Results of filter inspections and dates of replacements made;
- e. Total amount of VOM waste that is collected and shipped off-site, ton/mo and ton/yr;
- f. Total natural gas usage for the four drying ovens constructed under Joint Construction and Operating Permit 84060007 (therms/mo and therms/year); and
- g. Total emissions of VOM and PM as appropriate to demonstrate compliance with 7.1.6.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Conditions 7.1.3(f)-(i) (see also 35 IAC 218.204) within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected paint spray booths without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Utilize any coating, thinner, or cleaning solvent in any of the paint spray booths at this source with various VOM contents provided that the materials are tested in

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accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected paint spray booth remains in compliance with 35 IAC Part 218.204.

7.1.12 Compliance Procedures

- a. To determine compliance with Conditions 5.5.1, 7.1.3, and 7.1.6, VOM emissions from each coating shall be calculated based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formulae listed below:

$$\text{Coating VOM Emissions} = V \times D \times U$$

Where:

V = Percent VOM in the coating (wt. %)

D = Overall coating density (lb/gal)

U = Overall coating usage (gal/mo and gal/yr)

$$\text{Cleaning Solvent VOM Emissions} = V_1 \times D_1 \times U_1$$

Where:

V₁ = Percent VOM in the cleaning solvent (wt. %)

D₁ = Overall cleaning solvent density (lb/gal)

U₁ = Overall cleaning solvent usage (gal/mo and gal/yr)

VOM Waste = lb waste x percent VOM in the waste (wt. %)

$$\text{Total VOM Emissions} = \text{Coating Emissions} + \text{Cleaning Solvent Emissions} - \text{VOM Waste}$$

7.2 Unit 02 - Gluing Operation
 Control None

7.2.1 Description

Two glue spray booths and additional manual gluing devices are used to apply glue to wood and metal furniture. This operation also includes various manual gluing performed throughout the plant and any cleanup emissions.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed
02	GSB1 Glue Spray Booth	1994
	GSB2 Glue Spray Booth	1994
	Evans Postformer	1996
	Hofer Hot Press	1995
	Doucet Clamp Carrier	1993
	Double-Edge Bander	

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected gluing operation" for the purpose of these unit-specific conditions, is any of the two identical solvent joining units.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected gluing operation not being subject to 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, because the affected gluing operation does not meet the applicability of 35 IAC 218.920(a) and (b). In particular, the affected gluing operation has:

- a. Maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year; and

- b. A potential to emit for VOM that is less than 22.7 Mg (25 tons) per year.

7.2.5 Operational and Production Limits and Work Practices

None

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected gluing operation are subject to the following:

None

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected gluing operation to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the adhesive usage for the affected gluing operation, gal/mo and gal/yr;
- b. The VOM content of the adhesive, % by Wt;
- c. Density of adhesives, lb/gal;
- d. The cleanup solvent usage for the affected gluing operation, gal/mo and gal/yr;
- e. The VOM content of the cleanup solvent, wt. %;
- f. Density of cleanup solvent, lb/gal;

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- g. The aggregate monthly and annual VOM emissions from the affected gluing operation based on the adhesive and solvent usage, with supporting calculations; and
- h. For compounds determined to be photochemically reactive, the hours of operation and hourly VOM emissions from the affected gluing operation based on the adhesive and solvent usage and operating hours, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected gluing operation with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that this emission unit is exempt from those requirements [35 IAC 218.990].
- b. Emissions of VOM from the affected gluing operation in excess of the limits specified in Condition 7.2.3 or 7.2.6 within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

To determine compliance with Conditions 5.5.1, 7.2.3, and 7.2.6, VOM emissions from the affected gluing operation shall be calculated based on the following:

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$$\text{Adhesive VOM Emissions} = V \times D \times U$$

Where:

V = Percent VOM in the adhesive (wt. %)

D = Adhesive density (lb/gal)

U = Adhesive usage (gal/mo and gal/yr)

$$\text{Cleaning Solvent VOM Emissions} = V_1 \times D_1 \times U_1$$

Where:

V₁ = Percent VOM in the cleaning solvent (wt. %)

D₁ = Overall cleaning solvent density (lb/gal)

U₁ = Overall cleaning solvent usage (gal/mo and gal/yr)

Total VOM Emissions = Coating Emissions + Cleaning Solvent
Emissions

Hourly emissions may then be determined by dividing the
calculated emissions by the operating hours of the gluing
operation to determine compliance with Condition 7.2.3.

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7.3 Unit 03 - Woodworking Operations
 Control 01 - Dust Collectors

7.3.1 Description

Woodworking operations consist of processing wood panels for coating operations. Such operations include drilling, sanding, sawing, cutting, and grinding. All operations are controlled by two baghouses and five dust collectors.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
03	S1-S6 Saws	1/84 & 10/93	Dust Collector
	P-1 Planer	1/84	Dust Collector
	CNC1-CNC5 CNC Process	8/92, 1/94, 4/95, 2/96, 9/90	Dust Collector
	DET1 Double End Tenon (Profiling, Sanding, and Slotting)	1/84	Dust Collector
	D1 & D2 Drilling	1/84	Dust Collector
	SD1-SD5 Sanding	1/84 & 4/93	Dust Collector
	WC1 Wood Chipper	1/84	Dust Collector
	EB-2 Edgebander	1/84	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected woodworking operation" for the purpose of these unit-specific conditions, is a woodworking operation consisting of the equipment listed in Condition 7.3.2 controlled by a dust collector that is subject to 35 IAC 212 Subpart K.
- b. 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, pursuant to 35 IAC 212.301.
- c. Each affected woodworking operation is subject to the emission limits identified in Condition 5.2.2.

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected woodworking operations not being subject to 35 IAC 212.321 because 35 IAC 212.681 exempts the source from these requirements.

7.3.5 Control Requirements

The Permittee shall operate, maintain, and replace the dust collector filters in a manner that assures compliance with the conditions of this section.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected woodworking operations are subject to the following:

Emissions from the two CEA carrier-day filter dust collectors shall not exceed the following limits:

<u>(Hr/Yr)</u>	<u>PM Emissions</u>	
	<u>(Lb/Hr)</u>	<u>(Ton/Year)</u>
3,120	0.44	0.7

The above limitation was established in Construction Permit 84010034. [T1]

7.3.7 Operating Requirements

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, pursuant to 35 IAC 212.307.

7.3.8 Inspection Requirements

The Permittee shall visually inspect the filters and check the pressure drop on a regular basis in order to ensure proper operation of the dust collectors and the need for replacement.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected woodworking operation to demonstrate compliance with Conditions 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Inlet flow rate (lb/hr) and control efficiency of the dust collectors;
- b. A maintenance and repair log for each dust collector, listing each activity performed with date;
- c. Results of filter inspections and dates of replacements made;
- d. Hours of operation of the two CEA carrier-day filter dust collectors, hr/yr; and
- e. PM emissions from the dust collectors, lb/hr and T/yr.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected woodworking operation with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. To determine compliance with Conditions 5.5.1 and 7.3.6, VOM emissions from the two CEA carrier-day filter dust collectors shall be calculated based on the recordkeeping requirements in Condition 7.3.9 and the formula listed below:

$$\text{PM Emissions (lb/hr)} = \text{Inlet Flow Rate (lb/hr)} \times (1 - \text{Control Efficiency})$$

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PM Emissions (T/yr) = PM Emissions (lb/hr) x Hours of
Operation (hr/yr) / 2000 lb/T

- b. Compliance provisions addressing the particulate matter limitations in 7.3.3 are not set by this permit as compliance is assumed to be achieved by the normal work-practices, proper operation, and maintenance activities of an affected woodworking operation.

7.4 Unit 04 Boilers
 Control None

7.4.1 Description

This boiler is used to provide process and building heat. The boiler is fired with wood fuel.

7.4.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Control Equipment
04	B3 Wood Fired Boiler 2.63 mmBtu/hr	1996	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions is a fuel combustion unit that is fired with wood, with a heat input capacity less than 10 mmBtu/hr. As of the "date issued" as shown on page 1 of this permit, the affected boiler is identified in Condition 7.4.2.
- b. Affected boiler is subject to 35 IAC 212.204, No person shall cause or allow the emission of particulate matter into the atmosphere from any fuel combustion emission unit for which construction or modification commenced on or after April 14, 1972, using solid fuel exclusively to exceed 0.15 kg of particulate matter per MW-hr of actual heat input (0.1 lbs/mmBtu) in any one hour period.

7.4.4 Non-Applicability of Regulations of Concern

- a. Affected boiler is not subject to 35 IAC 216.121, 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/hr) to exceed 200 ppm, corrected to 50 percent excess air, since the firing rate is less than 10 mmbtu/hr.
- b. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units

constructed, reconstructed, or modified after June 9, 1989, with firing rates of 100 mmBtu/hr or less, but greater than 10 mmBtu/hr. The affected boiler has a firing rate is less than 10 mmbtu/hr. Therefore, these rules do not apply.

- c. Affected boiler is not subject to 35 IAC 217.541, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of each affected boiler is less than 73.2 MW (250 mmBtu/hr).
- d. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.4.5 Operational and Production Limits and Work Practices

Each affected boiler shall only be operated with wood waste as the fuel.

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1 and 7.4.5 pursuant to Section 39.5(7)(b) of the Act:

- a. Total wood waste usage for the boilers, tons/mo and tons/yr; and

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- b. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected boilers, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Emissions of NO_x, PM, SO₂, or VOM from the affected boilers in excess of the limits specified in Condition 5.5.1 based on the current months records plus the preceding 11 months within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with the emission limits in Conditions 5.5.1 and 5.5.3 shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:
 - i. Emissions from the affected boiler burning wood waste shall be calculated based on the following emission factors:

Emission Factor	
<u>Pollutant</u>	<u>(lb/ton)</u>
PM	1.02
NO _x	0.38
SO ₂	0.075
VOM	0.18

The emission factors for NO_x, SO₂, and VOM are the emission factors for uncontrolled wood combustion, Tables 1.6-2 and 1.6-3, AP-42, Fifth Edition, Volume I, updated March 1998. VOM emission factor based on Total Organic

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Carbon (TOC). The emission factor for PM is based on test data submitted to the Illinois EPA on September 18, 1998.

Boiler Emissions (lb) = wood waste burned multiplied by the appropriate emission factor.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____{insert public notice start date} (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

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- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

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- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276
- ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153
- iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506
- iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or

denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance

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was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

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- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

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9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

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9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

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10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

YY:jar

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Bretford Manufacturing is located at 11000 Seymour Avenue in Franklin Park, Illinois. The source is a manufacturer of office and institutional furniture. The following processes exist at the source; woodworking operations, wood coating, metal product line, and a projection screen and dry erase board production line. The woodworking operations take wood panels and cut, rout, drill, profile, groove, and sand the panels to produce the desired parts. The wood parts are then coated using one or more of the eight paint spray booths. The metal product line consists of phosphate washing, oven drying, powder paint booths, bake oven, and finally a burn off oven for cleaning the conveyor hooks. The projection screen and dry erase board production line consists of 2 paint spray booths. Gluing operations consist of 2 glue spray booths and several other miscellaneous pieces of equipment. The source also operates three boilers (one boiler is wood fired) to provide building and process heat.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Group 1 Coating Operation	8 Paint Spray Booths	1984, 1996	Waterwash and Filters
Group 2 Gluing Operation	2 Glue Spray Booths and Additional Manual Gluing Devices	1996, 1995, 1994, 1993	None
Group 3 Woodworking Operation	Sanding, Sawing, Cutting, and Grinding	1996-1992, 1990, 1984	2 Filters and 5 Dust Collectors
Group 4 Boiler	Wood Fired Fuel Combustion Units	1996	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	112.98
Sulfur Dioxide (SO ₂)	0.09
Particulate Matter (PM)	21.88
Nitrogen Oxides (NO _x)	6.45
HAP, not included in VOM or PM	-
TOTAL	141.40

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R or T1N. The Source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone nonattainment area and emits volatile organic material, the permit includes conditions to implement the Emission Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce emissions from stationary sources to contribute to further reasonable progress toward attainment, as further described in section 6 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emission reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

YY:jar

217/782-2113

November 24, 1999

Ms. Cheryl Newton (5AR-18J)
USEPA - Region V
Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Transmittal of Proposed CAAPP Permit for Bretford Manufacturing at 11000
Seymour Avenue, Franklin Park, Cook
Illinois EPA Identification Number: 031096AKZ
Illinois EPA Application Number: 95120185
Operation of: Wood and Metal Furniture Manufacturer

Dear Ms. Newton:

The proposed CAAPP permit referenced above is being provided to USEPA today by electronic mail for review pursuant to Sections 505(a)(1)(B) and (b) of the Clean Air Act. Illinois EPA will not take final action on this permit until after January 10, 2000, the close of the 45 day USEPA review period.

The draft of this permit has gone through public notice. No comments were received.

As a result of the Illinois EPA's final review following the public comment period, minor changes have been made to the permit as follows:

Condition 5.5.3 has been add and Conditions 7.1.6 and 7.2.6 have been revised to address the company's request. The language of Condition 5.5.3 is based on general guidance provided to the Illinois EPA by USEPA.

If you have any questions regarding this proposed permit, please contact Yeric Yarrington at 217/782-2113.

Sincerely,

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

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