

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

The Tapecoat Co., Inc.
Attn: Donald Kathrein
1527 Lyons Street
Evanston, Illinois 60201

Application No.: 72110414
Applicant's Designation:
Subject: Manufacturing of Tapes
Date Issued: May 20, 2002
Location: 1520-27 Lyons St., Evanston

I.D. No.: 031081ACU
Date Received: January 19, 2001
Expiration Date: May 20, 2007

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a enviorshield coating line, a 48" adhesive coating and laminating line, and a mixer, two liquid mixing tanks, one gas fired boiler, one 10,000 gallon storage tank, a mixtruder and calendar machine with a dust collector, and a mixing tank, holding tank, coater and dust collector for Tapecoat 20 production pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year of volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Pursuant to 35 Ill. Adm. Code 218.204(c), the VOM content of the coatings used for any paper (or tape) coating line shall not exceed 2.3 lbs of VOM per gallon of coating minus water and any compounds specifically exempted from the definition of VOM.
- 3a. Emissions and operation of the enviorshield coating line shall not exceed the following limits:

<u>Type of Coating</u>	<u>Coating Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>tons/mo</u>	<u>tons/yr</u>	<u>Wt%</u>	<u>lbs/mo</u>	<u>tons/yr</u>
Enviro 50:50	33.35	92.7	0.31	206.8	0.29
Enviro 100	16.16	112.2	0.24	77.6	0.27

The emission limits are based on the maximum coating usage and the maximum VOM content of the coatings used.

- b. This permit is issued based on that only Enviro 50:50 and Enviro 100 are the only coatings applied on enviorshield line. Application of any other coating has to be approved by the Illinois EPA.
- 4. Emissions an operation of the 48" adhesive coating and laminating line shall not exceed the following limits:

<u>Adhesive</u> tons/mo	<u>Usage</u> tons/yr	<u>VOM Content</u>		<u>VOM Emissions</u>	
		<u>Wt%</u>		<u>lbs/mo</u>	<u>ton/yr</u>
148.1	1628.6	0.3		888.6	4.89

The emission limits are based on the maximum adhesive usage and the maximum VOM content of the adhesive used.

- 5. Emissions and operation of the liquid mixing tanks for the production of alpha primer, mastic, beta primer, Iota A primer, Iota B primer, omega A primer and omega B primer shall not exceed the following limits:

<u>Product Produced</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>tons/mo</u>	<u>tons/yr</u>	<u>Wt%</u>	<u>lbs/mo</u>	<u>tons/yr</u>
Alpha Primer	41.8	167.1	0.8	17.8	0.036
Mastic	35.4	151.9	37.5	1712.0	3.67
Beta Primer	2.5	7.4	73.2	46.0	0.1
Iota A Primer	15.5	25.8	92.2	5148.0	4.3
Iota B Primer	11.1	15.5	90.9	4295.7	3.0
Omega A Primer	9.4	15.6	66.7	1800.0	1.5
Omega B Primer	20.3	33.8	71.3	3600.0	3.0

The emission limits are based on the material balance, i.e., weight of the material usage minus product produced.

The VOM emissions shall be calculated as follows:

$$\text{Emissions} = (\text{maximum material usage} - \text{product produced}) \times \text{VOM Content}$$

- 6. Emissions and operation of the mixing tank, holding tank for coating mix and coater for the production of Tapecoat 20 shall not exceed the following limits:

<u>Product Produced</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>tons/mo</u>	<u>tons/yr</u>	<u>Wt%</u>	<u>lbs/mo</u>	<u>tons/yr</u>
Tapecoat 20	191.2	2249.3	0.075	288.7	1.7

The emission limits are based on the material balance, i.e., weight of the material usage minus product produced.

The VOM emission shall be calculated as follows:

Emissions = (maximum material usage - product produced) x VOM Content

7. Compliance with the limitations in Conditions 3, 4, 5 and 6 shall be determined from a running total of 12 months of data, i.e., current months data plus the preceding 11 months.
8. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 9a. Pursuant to 35 Ill. Adm. Code 218.211(c), the Permittee shall collect and record all of the following information each day for each coating line:
 - i. The name and identification of each coating as applied on each coating line.
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
- b. The Permittee shall also maintain the following records to check compliance with the limitations of this permit:
 - i. Amount of each coating used (lbs/month and tons/year).
 - ii. VOM content of each coating used (weight percent).
 - iii. Name and identification of each adhesive and amount of each adhesive used on 48" adhesive coating and laminating line (lbs/month and tons/year).
 - iv. VOM content of each adhesive used (weight percent).
 - v. Type of products produced in the liquid mixing tanks, mixing tank, holding tank for coating mix and coater.
 - vi. Amount of material usage for each product (tons/month and tons/year).

- vii. VOM content of the material used for each product produced (weight percent).
 - viii. Amount of each product produced (tons/month and tons/year).
 - ix. Monthly records of hazardous air pollutant content of all coatings, adhesives and all other materials used.
 - x. Monthly HAP emissions from the use of all coatings, adhesives and all other materials used. Annual HAP emissions shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Unit in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
11. This permit is issued based on negligible emissions of particulate matter from the mixtruder and calendar machine. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

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

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

DES:JPB:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
USEPA - Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions of this tape manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled i.e., amount of coatings used.

- 1a. The enviorsheild coating line and associated VOM emissions shall not exceed the following limits:

<u>Type of Coating</u>	<u>Coating Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>tons/mo</u>	<u>tons/yr</u>	<u>Wt%</u>	<u>lbs/mo</u>	<u>tons/yr</u>
Enviro 50:50	33.35	92.7	0.31	206.8	0.29
Enviro 100	16.16	112.2	0.24	77.6	<u>0.27</u>
				Total =	0.56

The emission limits are based on the maximum coating usage and the maximum VOM content of the coating used.

- b. The 48" adhesive coating and laminating line and associated VOM shall not exceed the following limits:

<u>Adhesive Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
<u>tons/mo</u>	<u>tons/yr</u>	<u>Wt%</u>	<u>lbs/mo</u>	<u>ton/yr</u>
148.1	1628.6	0.3	888.6	4.89

The emission limits are based on the maximum adhesive usage and the maximum VOM content of the adhesive used.

- c. The liquid mixing tank and associated VOM emissions shall not exceed the following limits:

<u>Product Produced</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>tons/mo</u>	<u>tons/yr</u>	<u>Wt%</u>	<u>lbs/mo</u>	<u>tons/yr</u>
Alpha Primer	41.8	167.1	0.8	17.8	0.036
Mastic	35.4	151.9	37.5	1712.0	3.67
Beta Primer	2.5	7.4	73.2	46.0	0.1
Iota A Primer	15.5	25.8	92.2	5148.0	4.3
Iota B Primer	11.1	15.5	90.9	4295.7	3.0
Omega A Primer	9.4	15.6	66.7	1800.0	1.5
Omega B Primer	20.3	33.8	71.3	3600.0	<u>3.0</u>
				Total =	15.61

The emission limits are based on the material balance, i.e., weight of the material usage minus product produced.

- d. The Mixing tank, holding tank for coating mix and coater and their associated VOM emissions

<u>Product Produced</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>tons/mo</u>	<u>tons/yr</u>	<u>Wt%</u>	<u>lbs/mo</u>	<u>tons/yr</u>
Tapecoat 20	191.2	2249.3	0.075	288.7	1.7

The emission limits are based on the material balance i.e., weight of the material usage minus product produced.

- e. This permit is issued based on negligible emissions of volatile organic material from the storage tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- f. Emissions of VOM from all other activities at the facility are insignificant and shall not exceed nominal hourly emission rate and 0.44 tons/yr.

Total Facility-wide VOM = 0.56 + 4.89 + 15.61 + 1.7 + 0.44 + 0.44 = 23.64 tons/yr

- 2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

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