

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Illinois Flush Door, Inc.  
Attn: Ted Dorian  
1411 North Van Dyke Road  
Plainfield, Illinois 60544

Application No.: 73100116

I.D. No.: 197815AAH

Applicant's Designation:

Date Received: March 6, 2006

Subject: Door Manufacturing Operation

Date Issued: January 2, 2006

Expiration Date: December 11, 2007

Location: 1411 North Van Dyke Road, Plainfield, Will County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a spray booth with filtration and gluing operation pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons per year of volatile organic material (VOM), 25 tons per year of total combined hazardous air pollutants (HAPs), and 10 tons per year of any single hazardous air pollutant (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.
  - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - iii. This permit is issued based upon the plant not being subject to the requirements of 35 Ill. Adm. Code 218.204(1) (Wood Furniture Coating). This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year.
- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.

2. The 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.
- 3a. Pursuant to 35 Ill. Adm. Code 218.208(b)(2), the limitations of 35 Ill. Adm. Code 218 Subpart F shall apply to a source's wood furniture coating lines, on and after March 15, 1996, if the source contains process emission units, which as a group, have a potential to emit 22.7 Mg (25 tons) or more of VOM per calendar year and have not limited emissions to less than 22.7 Mg (25 tons) of VOM per calendar year through production or capacity limitations contained in a federally enforceable operating permit.
- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.
4. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.
- 5a. Emissions and operation of the spray booth and gluing operation shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lbs/Mo)</u>	<u>(Lbs/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Coatings, Lacquers, Sealers, Glues, Thinners, and Clean-Up Solvents (Total)	3.600	36,000	1.8	18.0

These limits are based on complete volatilization of the VOM content of the materials, material VOM usage = material usage x material VOM content. Note that there is a "nested" limit on the emissions of the combination of HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOMs and therefore limiting VOM emissions also limits HAP emissions.

- b. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program (CAAPP) Permit.

- c. The VOM and HAP emissions shall be calculated using the following:

VOM and HAP emissions from Coating Usage = Coating Usage (lb) x VOM or HAP content (Wt. %).

VOM and HAP emissions from Cleaning Solvent = Cleaning Solvent (lb) usage x VOM or HAP content (Wt. %).

VOM and HAP emissions from other materials = material usage (lb) x VOM or HAP content (Wt. %).

- d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
6. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
7. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
8. The Permittee shall maintain records of the vendor recommendations at the facility and be available for inspection and copying by the Illinois EPA.
- 9a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for

this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. Pursuant to 35 Ill. Adm. Code 218.211(b)(4), any owner or operator of a coating line which is exempted from the limitations of Section 218.204 because of 35 Ill. Adm. Code 218.208(b) shall collect and record all of the following information for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line; and
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on each coating line on a monthly basis.
- c. The Permittee shall maintain the following records:
  - i. Name, usage (gallons/month and gallons/year), and VOM and HAP contents (lbs/gallon or % weight) for the following materials:
    - A. Coatings;
    - B. Lacquers;
    - C. Sealers;
    - D. Thinners; and
    - E. Clean-up solvents.
  - ii. Monthly and annual emissions of VOM and HAPS from the source with supporting calculations (tons/month and tons/year).
10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
11. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance

Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

12. Pursuant to 35 Ill. Adm. Code 218.211(b)(6), any owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.204(1) because of 35 Ill. Adm. Code 218.208(b) shall notify the Illinois EPA if the source's VOM emissions exceed the limitations of 35 Ill. Adm. Code 218.208(b) by sending a copy of calculations showing such an exceedance within 30 days after the change occurs.
13. Two (2) copies of required reports and notifications shall be sent to:

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

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

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

It should be noted that the wood working operation with dust collection and four furnaces are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146 (aa), (jj), and (d), respectively.

It should be also noted that this permit has revised Condition 3 to a total for VOM limits, to allow greater flexibility of operations.

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

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

ECB:GMK:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from Door Manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons per year of volatile organic materials (VOM), 25 tons per year of total combined hazardous air pollutants (HAPs), and 10 tons per year of any single hazardous air pollutant (HAP)) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Material/Process</u>	E M I S S I O N S		
	VOM (Tons/Yr)	Single HAP (Toluene) (Tons/Yr)	Combined HAPs (Tons/Yr)
Coatings, Lacquers, Sealers, Glues, Thinners, and Clean-UP Solvents (Total)	18.0		
Total	18.0	< 10	< 25

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