

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

CraftMaster Manufacturing, Inc.  
Attn: Ted Dorian  
14325 South VanDyke Road  
Plainfield, Illinois 60544

Application No.: 73100116

I.D. No.: 197815AAH

Applicant's Designation:

Date Received: March 20, 2008

Subject: Door Manufacturing Operation

Date Issued: August 22, 2012

Expiration Date: August 22, 2022

Location: 14325 South VanDyke 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/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP), and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ.
  - iii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD.

- iv. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products, 40 CFR 63 Subpart QQQQ.
  - v. 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.
  - vi. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code 218.204(1) (Wood Furniture Coating).
- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
  - b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
  - c. Pursuant to 35 Ill. Adm. Code 212.301, 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.
  - d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination

with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).

3. 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, or 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.
- 4a. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ because the source is not a major source of HAP emissions. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs established in this permit.
- b. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD because the source is not a major source of HAP emissions. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs established in this permit.
- c. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products, 40 CFR 63 Subpart QQQQ because the source is not a major source of HAP emissions. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs established in this permit.
- d. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Wood Preserving Area Source, 40 CFR 63 Subpart QQQQQQ because the source is not a wood preserving operation. Pursuant to 40 CFR 63.11433, wood preserving means the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers.
5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of

wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U. S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

- 6a. Pursuant to 35 Ill. Adm. Code 218.187(a)(2), notwithstanding 35 Ill. Adm. Code 218.187(a)(1)(B), cleaning operations for emission units within the wood furniture coating category shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g).
- b. This permit is issued based on the source not being subject to 35 Ill. Adm. Code 218.204(1) (Wood Furniture Coating). This is a result of the federally enforceable production and emission limits, which restrict the potential to emit for VOM from the source's emission units to levels below the thresholds specified in 35 Ill. Adm. Code 218.208(b)(2) (i.e., 22.7 Mg (25 tons) of VOM per calendar year).
- c. This permit is issued based on the source not being subject to 35 Ill. Adm. Code 218.204(p) (Flat Wood Paneling Coatings) because the source does not apply coating to Flat Wood Paneling, as defined in 35 Ill. Adm. Code 211.2358.
- d. This permit is issued based on gluing operation not being subject to 35 Ill. Adm. Code 218 Subpart JJ (Miscellaneous Industrial Adhesives). Pursuant to 35 Ill. Adm. Code 218.900(a), except as provided in 35 Ill. Adm. Code 218.900(b), on and after May 1, 2012, the requirements of 35 Ill. Adm. Code 218 Subpart JJ shall apply to miscellaneous industrial adhesive application operations at sources where the total actual VOM emissions from all such operations, including related cleaning activities, equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.904(a)(1)(B), in the absence of air pollution control equipment.
- 7a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the

Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.

- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
8. Pursuant to 35 Ill. Adm. Code 218.900(d), the owner or operator of a source exempt from the emission limitations and control requirements of 35 Ill. Adm. Code 218 Subpart JJ because of the criteria in 35 Ill. Adm. Code 218.900(a) is subject to the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.904(a).
- 9a. 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.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the filters associated with the spray booth such that the filters are kept in

proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

- 10a. 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. This permit is issued based on negligible emissions of particulate matter from the spray booth. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- c. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 1.80 tons/month and 18.0 tons/year of any combination of such HAPs. 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.
- d. 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. %).
- e. 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).
- 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of

determining ground level and ambient air concentrations of such air contaminants:

- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Conditions 12 and 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
12. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
  13. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
  14. 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.

15. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 16a. 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 35 Ill. Adm. Code 218.204 because of 35 Ill. Adm. Code 218.208(a) or (b) shall comply with the following: For sources exempt under 35 Ill. Adm. Code 218.208(b), on and after March 15, 1998, the owner or operator of a coating line or group of coating lines referenced in 35 Ill. Adm. Code 218.211(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.
- b. Pursuant to 35 Ill. Adm. Code 218.904(a)(2), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218 Subpart JJ because of the criteria in 35 Ill. Adm. Code 218.900(a) shall comply with the following: Collect and record the following information each

month for each miscellaneous industrial adhesive application operation, maintain the information at the source for a period of three years, and provide the information to the Illinois EPA upon request:

- i. The name and identification number of each adhesive as applied by each miscellaneous industrial adhesive application operation; and
  - ii. The weight of VOM per volume and the volume of each adhesive (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each month by each miscellaneous industrial adhesive application operation;
- 17a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the filters associated with the spray booth:
    - A. Records for periodic inspection of the filters associated with the spray booth with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. The Permittee shall maintain records of the vendor recommendations at the facility and be available for inspection and copying by the Illinois EPA.
  - iii. Name, usage (gallons/month and gallons/year), VOM and HAP contents (% weight) and material density (lbs/gallon) for the following materials:
    - A. Coatings;
    - B. Lacquers;
    - C. Sealers;
    - D. Thinners; and
    - E. Clean-up solvents.
  - iv. Monthly and annual emissions of VOM and HAPS from the source with supporting calculations (tons/month and tons/year).
- b. 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 storage device) 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.

18. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 19a. Pursuant to 35 Ill. Adm. Code 218.211(b)(6), any owner or operator of a coating line that is exempted from the limitations of 35 Ill. Adm. Code 218.204(1) because of 35 Ill. Adm. Code 218.208(a) or (b) shall comply with the following: On and after March 15, 1998, 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.
- b. Pursuant to 35 Ill. Adm. Code 218.904(a)(3), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218 Subpart JJ because of the criteria in 35 Ill. Adm. Code 218.900(a) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from miscellaneous industrial adhesive application operations at the source, including related cleaning activities, ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs, and provide copies of those records upon request by the Illinois EPA.
- 20a. If there is an exceedance of or a 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 or 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.
- b. 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 four furnaces and wood working operation with dust collection and are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(d), (aa) and (jj), respectively.

If you have any questions on this, please call German Barria at 217/785-1705.

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

Date Signed: \_\_\_\_\_

ECB:GB: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/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAPs) 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>Emission Unit</u>	E M I S S I O N S (Tons/Year)			
	<u>PM</u>	VOM	<u>Single HAP</u>	<u>Combined HAPs</u>
Spray Booth and Gluing Operation (Total)	<u>0.44</u>	<u>18.0</u>	<u>----</u>	<u>18.0</u>
Total	<u>0.44</u>	<u>18.0</u>	<u>9.0</u>	<u>18.0</u>

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