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PROPOSED CAAPP PERMIT
Pace Industries, Inc.
I.D. No.: 031600BSM
Application No.: 95120182
November 29, 1999

1.0 SOURCE IDENTIFICATION

1.1 Source

Pace Industries, Inc.
2545 West Polk Street
Chicago, Illinois 60612
312/226-5500

I.D. No.: 031600BSM
Standard Industrial Classification: 2434, Wood Coating Industry

1.2 Owner/Parent Company

Pace Industries, Inc.
2545 West Polk Street
Chicago, Illinois 60612

1.3 Operator

Pace Industries, Inc.
2545 West Polk Street
Chicago, Illinois 60612

James J. Palka, President
312/226-5500

1.4 General Source Description

Pace Industries, Inc. is located at 2545 West Polk Street in Chicago, Illinois. The source is a manufacturer of kitchen cabinets. The following processes exist at the source; woodworking operation and wood coating. The woodworking operation takes wood panels and cuts, routs, drills, profiles, grooves, and sands the panels to produce the desired parts. The wood parts are then coated using ten paint spray booths. The source also operates two boilers and four make-up air units to provide building heat.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois 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
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
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
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
lb	pound
mG	megagrams
mmBtu	Million British thermal units
mo	month
MSDS	Material Safety Data Sheet
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
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T	tons
T1	Title I - identifies Title I conditions that have been carried over from an existing permit

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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 permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound
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:

Fuel combustion emissions from two boilers (maximum firing rates of 6.75 mmbtu/hr and 4.18 mmbtu/hr) that would not emit more than 1 lb/hour of any regulated pollutant not listed as hazardous pursuant to Section 112(b) of the Clean Air Act in the absence of air pollution control equipment; would not emit more than 0.1 lb/hr of any regulated pollutant listed as hazardous pursuant to Section 112(b) of the Clean Air Act in the absence of air pollution control equipment; and is not a process unit.

- 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:

None

- 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; [35 IAC 201.210(a)(4)].

- 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

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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 Wood Coating Operations	10 Paint Spray Booths	80', 83', 88', 89', 92', 85', 93'	Filters
Group 2 Woodworking Operations	Sawing, Sanding and Drilling		Dust Collectors

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

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 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:

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- 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 This stationary source, as defined in 40 CFR Part 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, is subject to 40 CFR Part 63. This stationary source shall comply and certify compliance with the applicable requirements of 40 CFR Part 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

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 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)	84.71
Sulfur Dioxide (SO ₂)	0.05
Particulate Matter (PM)	2.67
Nitrogen Oxides (NO _x)	7.12
HAP, not included in VOM or PM	---
TOTAL	94.55

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

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 Operating Scenarios

The Permittee shall maintain records of the following items to allow verification that all coatings applied in any paint spray booth at the source are in compliance with 35 IAC Part 218.204(1)(1-7):

- a. The name and identification number of each coating as applied on the affected paint spray booth.
- b. The usage of each coating, in units of gallons/month and gallons/year.
- c. 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 the affected paint spray booth.
- d. The applicable VOM limit for each applied coating, pursuant to 35 IAC Part 218.204.
- e. VOM emissions calculations for each paint spray booth (lb/mo & ton/yr).
- f. 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.
- g. The operating schedule of the affected paint spray booth.
- h. Results of filter inspections and dates of replacements made.

5.6.3 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 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.

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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

Paint Spray Booths

- a. The Permittee is authorized to utilize any coating in any of the paint spray booths at this source provided that the materials are tested in accordance with Conditions 7.1.7, the source wide emission limitations in Condition 5.5.1 are not exceeded, and the affected paint spray booths remain in compliance with 35 IAC Part 218.204 and the requirements of 40 CFR 63 Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations; and
- b. The Permittee shall keep records as indicated in Condition 5.6.3 above to ensure compliance with 35 IAC Part 218.204 and the requirements of 40 CFR 63 Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations.

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5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating 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. 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 EMISSION 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 further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year, starting with the 1999 ozone season, 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 emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An 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 account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its 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 emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 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 (35 IAC 205.710). A source may also transfer or sell the ATUs that it holds to other sources or participants (35 IAC 205.630).

6.2 Applicability

Emissions of VOM from the source for the seasonal allotment period of May 1 through September 30 of each year shall not exceed 15 tons, not including VOM from insignificant units and activities as identified in Section 3 of this permit. This limitation is established at the request of the source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS) pursuant to 35 IAC 205.205.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine of compliance with the above limitation:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate to determine VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions in tons during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source in tons during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the annual emissions report by (October 31) of each year, reporting emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC 205.200, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Paint Spray Booths

7.1.1 Description

The Permittee is a manufacturer kitchen cabinets. Coating is applied using ten paint spray booths (particulate matter is controlled by filters), which is then air dried. The spray booths utilize high volume low pressure (HVLP), high transfer efficiency system (HTES), and airless spray guns. The emissions associated with cleaning operations are also included.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Control Equipment
01	Paint Spray Booths A-1	1979	Filter
	Paint Spray Booths A-2	1983	Filter
	Paint Spray Booths A-3	1983	Filter
	Paint Spray Booths A-4	1983	Filter
	Paint Spray Booths A-5	1988	Filter
	Paint Spray Booths A-6	1989	Filter
	Paint Spray Booths A-7	1989	Filter
	Paint Spray Booths A-8	1992	Filter
	Paint Spray Booths A-9	1985	Filter
	Paint Spray Booths A-10	1993	Filter

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected 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 which falls under the category of existing wood furniture coating (constructed or reconstructed prior to December 6, 1994) and is subject to 40 CFR 60 Subpart JJ "National Emission Standards for Wood Furniture Manufacturing Operations". 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. Each affected paint spray booth 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
E = Allowable emission rate

- 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]

c. Each affected paint spray booth at the source is subject to 35 IAC 218.204(1)(1-4) for wood furniture coatings, and is electing to comply by means of 35 IAC 218.215:

i. On or after March 15, 1998, an owner or operator of a source subject to the limitations of 35 IAC 218.204(1) and electing to rely on the wood furniture coating averaging approach to demonstrate compliance with 35 IAC 218.204(1) must establish, by use of 35 IAC 218.215(b)(1), that, on a daily basis, actual emissions from the affected source are less than or equal to ninety percent of the allowable emissions, that is $V[a] < V[p]$, as specified in 7.1.12 below.

[35 IAC 218.215]

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.

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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]

d. Pursuant to 40 CFR 63.802(1), using any of the compliance methods of 40 CFR 63.804(a), the Permittee shall comply with the following limitations:

i. A weighted average emission limitation of 1.0 lb VHAP/lb solids, as applied for all finishing operations.

ii. Maximum VOC content of 0.8 lb VOC/lb solids for all cleaning operations.

e. Each affected paint spray booth is subject to the emission limits identified in Condition 5.2.2.

7.1.4 Non-Applicable Regulations of Regulations of Concern

Each affected paint spray booth is not 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.

7.1.5 Operational Production and Work Practices

a. Pursuant to 40 CFR 63.803, the Permittee shall comply with the work practice standards including:

- i. Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (1) of 40 CFR 63.803. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (1) of 40 CFR 63.803 or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

- ii. Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

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- A. A list of all current personnel by name and job description that are required to be trained;
 - B. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - C. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - D. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- iii. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
- A. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
 - B. An inspection schedule;
 - C. Methods for documenting the date and results of each inspection and any repairs that were made;
 - D. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

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1. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 2. Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- iv. Each owner or operator of an affected source shall develop an organic solvent accounting form to record:
- A. The quantity and type of organic solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801;
 - B. The number of pieces washed off, and the reason for the washoff; and
 - C. The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- v. Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR 63 Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.
- vi. Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source

shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.

- vii. Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- viii. Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - A. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - B. For touchup and repair under the following conditions:
 - 1. The touchup and repair occurs after completion of the finishing operation; or
 - 2. The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - C. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - D. When emissions from the finishing application station are directed to a control device;
 - E. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total

gallons of finishing material used during that semiannual period; or

- F. The conventional air gun is used to apply stain on a part for which it is technically or economically unfeasible to use any other spray application technology. The affected source shall demonstrate technical or economic unfeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic unfeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic unfeasibility:
1. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 2. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- ix. Each owner or operator of an affected source shall pump or drain all organic solvent used for line cleaning into a normally closed container.
- x. Each owner or operator of an affected source shall collect all organic solvent used to clean spray guns into a normally closed container.
- xi. Each owner or operator of an affected source shall control emissions from washoff operations by:

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- A. Using normally closed tanks for washoff;
and
 - B. Minimizing dripping by tilting or rotating
the part to drain as much solvent as
possible.
- xii. Each owner or operator of an affected source
shall prepare and maintain with the work
practice implementation plan a formulation
assessment plan that:
- A. Identifies VHAP from the list presented in
Table 5 of 40 CFR 63 Subpart JJ that are
being used in finishing operations by the
affected source;
 - B. Establishes a baseline level of usage by
the affected source, for each VHAP
identified in 40 CFR 63.803(1)(1). The
baseline usage level shall be the highest
annual usage from 1994, 1995, or 1996, for
each VHAP identified in paragraph (1)(1).
For formaldehyde, the baseline level of
usage shall be based on the amount of free
formaldehyde present in the finishing
material when it is applied. For styrene,
the baseline level of usage shall be an
estimate of unreacted styrene, which shall
be calculated by multiplying the amount of
styrene monomer in the finishing material,
when it is applied, by a factor of 0.16.
Sources using a control device to reduce
emissions may adjust their usage based on
the overall control efficiency of the
control system, which is determined using
the equation in 40 CFR 63.805(d) or (e).
 - C. Tracks the annual usage of each VHAP
identified in 40 CFR 63.803(1)(1) by the
affected source that is present in amounts
subject to MSDS reporting as required by
OSHA.
 - D. If, after November 1998, the annual usage
of the VHAP identified in 40 CFR 63.803

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(1)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

1. The exceedance is no more than 15.0 percent above the baseline level;
 2. Usage of the VHAP is below the de minimis level presented in Table 5 of 40 CFR 63 Subpart JJ for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in 40 CFR 63.805(d) or (e);
 3. The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
 4. The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.
- E. If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and

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practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the source need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

- F. If after November 1998, an affected source uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 6 of 40 CFR 63 Subpart JJ. If usage of the VHAP of potential concern exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs 40 CFR 63.803 (1)(4)(i) through (1)(4)(iv), the affected source shall follow the procedures established in 40 CFR 63.803(1)(5).

- b. Pursuant to 35 IAC 218.217(a), Each owner or operator of a source 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,

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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.

- c. Pursuant to 35 IAC 218.217(b), Each owner or operator of a source 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.

- d. Pursuant to 35 IAC 218.217(c), No owner or operator of a source 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.
- e. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- f. An adequate inventory of spare filters shall be maintained.
- g. The coatings shall be applied with high volume, low pressure, spray equipment.
- h. 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.

7.1.6 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.

7.1.7 Testing Requirements

- a. Performance tests shall be conducted in accordance with 40 CFR 63.805 to demonstrate initial and ongoing compliance as follows:

The EPA Method 311 of Appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the solids content by

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weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a source's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

- b. Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 215.105(a), 215.211(a), and Section 39.5(7)(b) of the Act]
- c. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105(a), 215.208 and 215.211(a).
 - i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105(a);
 - ii. This testing may be performed by the supplier of a material provided that the supplier

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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 215.105(a), 215.208, and 215.211(a)]

- d. The VOM content of reclaimed solvents shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A.

7.1.8 Monitoring Requirements

- a. The owner or operator of an existing affected source subject to 40 CFR 63.802(a)(1) shall comply with the following monitoring requirements:
 - i. Calculate the average VHAP content for all finishing materials used at the source using Equation 1, and maintain a value of E no greater than 1.0;
 - ii. Use compliant finishing materials according to the following criteria:
 - A. Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
 - B. Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and

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- C. Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.
- b. The Permittee shall visually inspect the filters and check for air flow drop on a regular basis in order to ensure proper operation of the filters and the need for replacement.

7.1.9 Recordkeeping Requirements

- a. Pursuant to 40 CFR 63.806, the Permittee shall comply with the following recordkeeping requirements:
 - i. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in §63.802;
 - ii. The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in §63.802; and
 - iii. The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in §63.802(a)(3) or (b)(3).
 - iv. The owner or operator of an affected source following the compliance method in §63.804(a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
 - v. Pursuant to 40 CFR 63.806(e), the Permittee shall maintain onsite the work practice implementation plan and all records associated

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with fulfilling the requirements of that plan,
including, but not limited to:

- A. Records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place.
 - B. Records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c).
 - C. Records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d).
 - D. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 CFR 63.803(h)(5).
 - E. Records associated with the formulation assessment plan required by 40 CFR 63.803(l).
 - F. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- vi. Records of compliance certifications for each semiannual period following the compliance date [40 CFR 63.806(h)].
 - vii. Records of other information included with the compliance status report as required by 40 CFR 63.807(b) [40 CFR 63.806(i)]
- b. 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.

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- ii. The usage of each coating and cleaning solvent, in units of gallons/day 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 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.
- c. 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.
- d. 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;
- e. The operating schedule of the affected paint spray booths;
- f. Results of filter inspections and dates of replacements made;
- g. Total amount of VOM waste that is collected and shipped off-site, ton/day and ton/yr; and
- h. Daily and the aggregate annual VOM emissions from the affected paint spray booths based on the operating

schedule and the typical hourly emission rate, with supporting calculations.

7.1.10 Reporting Requirements

- a. The Permittee shall fulfill all reporting requirements of 40 CFR 63.7 through 40 CFR 63.10 of subpart A (General Provisions) according to the applicability criteria in 40 CFR 63.800(d).
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected coating line 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.
- c. Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by §63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is December 6, 1998, the averaging calculation shall include data from December 1, 1998 to December 31, 1998.
- d. Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by 40 CFR 63.807(c).
 - i. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than

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1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

- ii. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

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 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 and 40 CFR 63 Subpart JJ.

However, paint spray booth 10 shall not use paints and solvents which would result in emissions that would be considered a major modification, i.e. 25 ton of VOM, pursuant to 35 IAC Part 203.

7.1.12 Compliance Procedures

- a. Pursuant to 40 CFR 63.804(a), the Permittee shall comply with the provisions of 40 CFR 63.802(a)(1) by the following methods:
 - i. Calculate the average VHAP content for all finishing materials used at the source using

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the following equation while maintaining a value of E no greater than 1.0;

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n) / (M_{c1} + M_{c2} + \dots + M_{cn})$$

Where:

E = The emission limit achieved by an emission point or a set of emission points, in kg VHAP/kg solids (lb VHAP/lb solids).

M_c = The mass of solids in finishing material "c" used monthly, kg solids/month (lb solids/month).

C_c = The VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).

S = The VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.

W = The amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.

- ii. Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.
- b. 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:

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

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

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

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

Where:

V₁ = Percent VOM in the cleaning solvent (%)

D₁ = Overall cleaning solvent density (lb/gal)

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

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

- c. Compliance with 35 IAC 218 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:

$$V[a] < V[p]$$

$$V[a] = \sum_{i=1}^n (ER[TCi]) * TC[i]; \text{ and}$$

$$V[p] = 0.9 * \sum_{i=1}^n (0.8 * TC[i])$$

Where:

V[a] = Actual VOM emissions from the source.

V[p] = 90% of the allowable VOM emissions from the source.

n = Number of different wood furniture coatings as applied each day on each coating line.

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i = Subscript denoting an individual coating.

$TC[i]$ = Kilograms of solids in topcoat "I" used.

$ER[TCi]$ = VOM Content of topcoat "i" in kg VOM/kg solids, as applied.

- d. Compliance provisions addressing the particulate matter limitations in this section 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 paint spray booth.

7.2 Unit-02 Woodworking Operations
Control-01 Dust Collectors

7.2.1 Description

Woodworking operations consist manufacturing kitchen cabinets for coating operations. Such operations include drilling, sanding, and sawing (total of 64 pieces of equipment). All operations are controlled by dust collectors.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	Saws	Dust collector
	Belt Sanders	Dust collector
	Drills	Dust collector

7.2.3 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 7.2.2 controlled by a dust collectors that are 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.

7.2.4 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.

7.2.5 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.

7.2.6 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.

7.2.7 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.

7.2.8 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.

7.2.9 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 and control efficiency of the dust collectors;
- b. A maintenance and repair log for each dust collector, listing each activity performed with date; and
- c. Results of filter inspections and dates of replacements made.

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7.2.10 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.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance provisions addressing the particulate matter limitations in this section 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 paint spray booth.

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 _____ (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.

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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

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;

- 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.

Pace Industries, Inc. is located at 2545 West Polk Street in Chicago, Illinois. The source is a manufacturer of kitchen cabinets. The following processes exist at the source; woodworking operation and wood coating. The woodworking operation takes wood panels and cuts, routs, drills, profiles, grooves, and sands the panels to produce the desired parts. The wood parts are then coated using ten paint spray booths. The source also operates two boilers and four make-up air units to provide building heat.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Group 1 Wood Coating Operations	10 Paint Spray Booths	80', 83', 88', 89', 92', 85', 93'	Filters
Group 2 Woodworking Operations	Sawing, Sanding and Drilling		Dust Collectors

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)	84.71
Sulfur Dioxide (SO ₂)	0.05
Particulate Matter (PM)	2.67
Nitrogen Oxides (NO _x)	7.12
HAP, not included in VOM or PM	---
TOTAL	94.55

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

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.

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