

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
RENEWAL

PERMITTEE

Stimsonite Corporation
Attn: Paul Gniadek
902 Feehanville Drive
Mount Prospect, Illinois 60056

Application No.: 93070040 I.D. No.: 031198ABW
Applicant's Designation: SHEETING 1 Date Received: January 31, 2000
Subject: Reflective Tape Manufacturing
Date Issued: September 13, 2000 Expiration Date: September 13, 2005
Location: 902 Freehan Drive, Mount Prospect

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a reflective film coating line with dryer and a mix room exhaust booth pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 25 tons/year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

3. Emissions and operation of the plastic film coating line shall not exceed the following limits:

| <u>Coating</u> | <u>Usage Rates*</u> | | <u>VOM Content</u> (Lb/Gal)* | <u>VOM Emissions</u> | |
|----------------|---------------------|----------|---------------------------------|----------------------|----------|
| | (Gal/Day) | (Gal/Yr) | | (Lb/Day) | (Ton/Yr) |
| Back Coating | 63 | 22,050 | 0.28 | 18.00 | 3.09 |
| Slurry | 34 | 5,950 | 5.34 | 182.00 | 15.89 |
| Other | 4 | 1,400 | 0.01 | 0.04 | 0.01 |

* (Less water and other exempt compounds)

These limits are based on complete volatilization of VOC content in the coatings and the use of a Daily Weighted Average determination of 35 IAC 218.205(a) to show compliance with limitation of 35 IAC 218.204(c) of 2.3 lb VOM/gallon of coating (less water and other exempt compounds). Compliance with annual limits shall be determined from a running total of 12 months of data.

4. Emissions and operation of solvent usages (cleaning, washes, and testing) shall not exceed the following limits:

| <u>Coating</u> | <u>Usage Rates</u> | | <u>VOM Emissions</u> | |
|----------------|--------------------|---------|----------------------|----------|
| | (Lb/Mo) | (Lb/Yr) | (Lb/Mo) | (Ton/Yr) |
| Solvents | 145 | 1,740 | 145 | 0.87 |

These limits are based on complete volatilization of VOC content in the solvents. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. Emissions and operation of the dryer shall not exceed the following limits:

| <u>Equipment</u> | <u>Heat Input</u> Rating (mmBtu/Hr) | <u>Pollutant</u> | <u>Emission</u> Factor (Lb/mmscf) | <u>Emissions</u> | |
|------------------|---|------------------|---|------------------|--------|
| | | | | (Lb/Hr) | (T/Yr) |
| Dryer | 4.2 | NO _x | 100 | 0.41 | 1.80 |
| | | CO | 84 | 0.35 | 1.51 |

These limits are based on standard AP-42 emission factors and 8,760 hours of operation and the use of natural gas as the only fuel fired in the dryer. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. This permit is issued based on negligible emissions of particulate matter (TSP) from the mixing room exhaust booth. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

7. This permit is issued based on negligible emissions of volatile organic material (VOM) from the mixing room exhaust booth. For this

purpose, emissions shall not exceed nominal emission rates of 0.2 lb/hour and 0.88 ton/year.

8. The Permittee shall maintain monthly and annual records of the following:

- a. Pursuant to 35 IAC 218.211(d)(2) the Permittee shall maintain the following records:
 - i. The name and identification number of each coating as applied on each coating line.
 - 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 each day on each coating line.
 - iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in Section 218.104 of this part.
 - b. Pursuant to 35 IAC 218.211(d)(3) the Permittee shall maintain the following records and notifications:
 - i. Any record showing violation of Section 218.205 of this Subpart shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance with this Subpart from Section 218.205 of this Subpart to Section 218.204 or Section 218.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (c)(1) or (e)(1) of this Section, respectively. Upon changing the method of compliance with this subpart from Section 218.205 to Section 218.204 or Section 218.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (c) or (e) of this Section, respectively.
 - c. Usage (lb/day and lb/year), VOM and HAP content (lb/gallon or % wt.), and emissions of VOM and HAPs (lb/day and ton/year) of the following:
 - i. Back coatings
 - ii. Slurry
 - iii. Solvents
 - iv. other coatings
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection

and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

12. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: records indicated in Conditions 8(a) and 8(b).

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

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

DES:EEJ:psj

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

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from reflective coating operation 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. Limiting the daily and yearly usages of coatings and solvents. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of volatile organic material 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.

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|----------------|---------------------|-----------------|--------------------|----------------------|-----------------|
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I. INTRODUCTION

Stimsonite Corporation has submitted an Application for the renewal of their Federally Enforceable State Operating Permit (FESOP). This Application has been submitted in order to maintain federally enforceable limits. These limits would prevent the facility from being a major source of Volatile Organic Material (VOM) and Hazardous Air Pollutants (HAPs), and thereby relieving them of having to obtain a Clean Air Act Permit Program (CAAPP). Included with these federally enforceable limits would be specific recordkeeping and reporting requirements to assure that the facility is operated as a non-major source. These conditions would be enforced by both the USEPA and Illinois EPA.

II. SOURCE DESCRIPTION

Stimsonite Corporation is located in Mt. Prospect, Illinois. The renewal request is for a reflective film manufacturing operation. The operation consists of a plastic coating operation with screen washer, drying oven and a mix room exhaust booth.

The mix room exhaust booth mixes solvents and silica powder to produce the reflective film coating. The coating is then applied to a plastic film. The film is then dried and the final product is the reflective film.

III. EMISSIONS

Emissions of VOM and Hazardous Air Pollutants (HAPs) from the mixing and coating operations will occur when the VOM and HAP contained in the various mixed solvents, reflective coating and clean-up solvents volatilize.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the emission standards set by the Illinois Pollution Control Board. The Pollution Control Board's emission standards represent the basic requirements for sources in Illinois. The Pollution Control Board has emission standards for VOM and HAPs. The Stimsonite Corporation readily complies with all emission standards set forth by the Pollution Control Board.

V. PROPOSED PERMIT

The conditions in this FESOP are designed to ensure that this facility is continually operated as a non-major source. This permit has conditions that limit the usage of inks, coatings, adhesives and clean-up solvents. This permit also contains conditions of specific

recordkeeping and reporting requirements. Stimsonite Corporation must carry out these procedures on an ongoing basis to demonstrate compliance with the limits set forth in this FESOP.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA preliminary determination that the facility meets all applicable state and federal air pollution control regulations. The Illinois EPA is therefore proposing the issuance of this FESOP with all of the specific requirements contained in the permit. Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on this draft FESOP. If substantial interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Ad. Code Part 166.

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