

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Parenti & Raffaelli, Ltd.  
Attn: Debra Wozniak  
215 East Prospect Avenue  
Mount Prospect, Illinois 60056

<u>Application No.:</u> 95120141	<u>I.D. No.:</u> 031198ABT
<u>Applicant's Designation:</u>	<u>Date Received:</u> May 31, 2005
<u>Subject:</u> Architectural Woodworks Manufacturer	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 215 East Prospect Avenue, Mount Prospect, Cook County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 3 wood paint spray booths with filters, gluing operation (glue spray booth, manual applicators and gluing equipment cleaning operation), and miscellaneous small combustion sources (<2.5 million Btu/hour), pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. This federally enforceable state operating permit (FESOP) is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
  - ii. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations to 40 CFR 63, Subpart JJ. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
  - iii. To limit emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205, except reporting requirements of 35 Ill. Adm. Code 205.300.

- iv. This permit is issued based upon the plant not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes) and 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units). This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year.
  - b. Prior to 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.
- 2a. 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 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
  - c. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- i. All normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
  - ii. 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.
- d. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:

- i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program,
- e. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
3. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 218.204(1), no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with the Subpart must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and

reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows:

- i. Wood furniture sealers and topcoats must comply with the following limitations:

		kg VOM/kg solids	lb VOM/lb solids
A.	Topcoat	0.8	(0.8)

- B. Sealers and topcoats with the following limits:

		kg VOM/kg solids	lb VOM/lb solids
I.	Sealer other than acid-cured alkyd amino vinyl sealer	1.9	(1.9)
II.	Topcoat other than acid-cured alkyd amino conversion varnish topcoat	1.8	(1.8)
III.	Acid-cured alkyd amino vinyl sealer	2.3	(2.3)
IV.	Acid-cured alkyd amino conversion varnish topcoat	2.0	(2.0)

- ii. Other wood furniture coating limitations:

		kg/l	lb/gal
A.	Opaque stain	0.56	(4.7)
B.	Non-topcoat pigmented coat	0.60	(5.0)
C.	Repair coat	0.67	(5.6)
D.	Semi-transparent stain	0.79	(6.6)
E.	Wash coat	0.73	(6.1)

- iii. Other wood furniture coating requirements:

- A. No source subject to the limitations of 35 Ill. Adm. Code 218.204(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.

- B. Any source subject to the limitations of 35 Ill. Adm. Code 218.204(1)(2) or (3) shall comply with the requirements of 35 Ill. Adm. Code 218.217.
- b. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- 3a. Spray booth cleaning. Pursuant to 35 Ill. Adm. Code 218.217(a), each owner or operator of a source subject to the limitations of 35 Ill. Adm. Code 218.204(1) 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, 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.
- b. Cleaning and storage requirements. Pursuant to 35 Ill. Adm. Code 218.217(b), each owner or operator of a source subject to the limitations of 35 Ill. Adm. Code 218.204(1) 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.
- c. Application equipment requirements. Pursuant to 35 Ill. Adm. Code 218.217(c), no owner or operator of a source subject to the limitations of 35 Ill. Adm. Code 218.204(1) shall use conventional air spray guns to apply coating materials to wood furniture except under the circumstances specified in 35 Ill. Adm. Code 218.217(c)(1) through (4):
  - 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;

- C. If spray gun is aimed and triggered automatically, rather than manually; or
  - D. If emissions from the finishing application station are directed to control a device pursuant to 35 Ill. Adm. Code 218.216.
- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.
- c. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 4a. Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.
- b. 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 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.
- 5a. Aggregate material usage, emissions, and operations of the three wood paint spray booths shall not exceed the following limits:

<u>Coating</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Clear Top Coat	500	2,700	2,800	7.7
Pigmented Coat	400	2,000	2,000	5.0
Semi-Transparent				
Stain	250	1,200	1,650	4.0
Sealer	550	3,200	3,080	9.0
(Cleanup Solvent)	400	4,000	2,300	<u>11.5</u>
			Total	24.5

These limits are based on the maximum material usage and material balance.

- b. This permit is issued based on negligible emissions of particulate matter from the three paint spray booths. For this purpose, emissions from each unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- c. Emissions and operation of the gluing operation shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Gluing Operation	200	2,000	1,200	6.0
Cleanup Solvent	50	250	400	1.0
			Total	7.0

These limits are based on the maximum material usage and material balance.

- d. This permit is issued based on negligible emissions of particulate matter from the glue spray booth. For this purpose, emissions from this unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
  - e. The above limitations were established in Permit 90090050, pursuant to 35 Ill. Adm. Code Part 203 and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203 and the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.
6. Operation and emissions of the natural gas fired combustion equipment shall not exceed the following limits:

Natural Gas Usage: 10 mmscf/month, 60 mmscf/year

<u>Coating</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(Lbs/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO <sub>x</sub> )	100	1.00	3.00
Carbon Monoxide (CO)	84	0.80	2.52
Volatile Organic Material (VOM)	5.5	0.06	0.20
Particulate Matter (PM)	7.6	0.08	0.23
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.06	0.02

These limits are based on the maximum equipment operations and standard emission factors give by AP-42.

7. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
8. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 9a. Pursuant to 35 Ill. Adm. Code 212.107, 212.109, and 212.110, testing for particulate matter emissions shall be performed as follows:
  - i. For both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, incorporated by reference in 35 Ill. Adm. Code 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301, pursuant to 35 Ill. Adm. Code 212.107.
  - ii. Except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 Ill. Adm. Code 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged, pursuant to 35 Ill. Adm. Code 212.109.
  - iii. Measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E, pursuant to 35 Ill. Adm. Code 212.110(a).
  - iv. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4, pursuant to 35 Ill. Adm. Code 212.110(b).
  - v. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for

particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA, pursuant to 35 Ill. Adm. Code 212.110(c).

- b. Testing required by Condition 9(a) shall be performed by a qualified independent testing service.
10. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
- 11a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

- c. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line.
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
  - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(1)(2)(A) or (B), the weight of VOM per weight of solids in each coating as applied each day on each coating line and certified product data sheets for each coating; and
  - iv. For wood furniture coating spray booths subject to the limitations of 35 Ill. Adm. Code 218.204(1)(4)(A), the weight of VOM per weight of solids in each strippable spray booth coating as applied each day on each spray booth and certified product data sheets for each coating.
- d. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit
  - i. Coating usage, cleanup solvent usage and glue usage (gallons/month and gallons/year);
  - ii. The VOM and HAP content of each coating, cleanup solvent and glue (% by weight);
  - iii. Density of each coating, cleanup solvent and glue (lb/gal);
  - iv. Natural gas usage (mmscf/month and mmscf/year); and
  - v. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAP from the source with supporting calculations (tons/month and tons/year).
- e. The Permittee shall maintain the following records to determine compliance with the 15 tons VOM/ozone season limitation specified in Condition 4:
  - 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 this permit, as appropriate, to determine actual 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 this permit; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
12. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 13a. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(b) and 35 Ill. Adm. Code 205.300.
  - c. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
  - d. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.204 shall notify the Illinois EPA in the following instances:
    - i. Any record showing violation of 35 Ill. Adm. Code 218.204 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 from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall

comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), respectively. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), respectively.

14. Two (2) copies of required reports and notifications shall be sent to:

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

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

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

It should be noted that woodworking operations (sanding, sawing, cutting, grinding, etc.) with a cyclone and dust collector are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(aa).

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

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

ECB:DWH:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

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

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						HAPs	
	<u>VOM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>Single</u>	<u>Total</u>	
	3 Wood Paint Spray Booths	37.2			1.32			
Gluing Operation	7.0			0.44				
Natural Gas Fired								
Combustion Equipment	<u>0.20</u>	<u>3.00</u>	<u>2.52</u>	<u>0.23</u>	<u>0.02</u>			
Plant-Wide Totals	<u>44.4</u>	<u>3.00</u>	<u>2.52</u>	<u>1.99</u>	<u>0.02</u>	9.0	22.5	

DWH:psj

Attachment B - Emissions Reduction Market System (ERMS)

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 reasonable further 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. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' FESOP or CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable 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 transaction account to cover its actual VOM emissions during the preceding season. A transaction 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 transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction 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 Ill. Adm. Code 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 Ill. Adm. Code 205.500 and 35 Ill. Adm. Code 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" (ACMA) (35 Ill. Adm. Code 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 Ill. Adm. Code 205.630).

2. Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.

3. Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine 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 this permit, as appropriate, to determine actual 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, which may be specified in 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 actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(b) and 35 Ill. Adm. Code 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 shall immediately comply with 35 Ill. Adm. Code Part 205, including holding allotment trading units (ATUs) for its VOM emissions during the first seasonal allotment period it exceed 15 tons and each seasonal allotment period, thereafter, pursuant to 35 Ill. Adm. Code 205.150(c).

DWH:psj