

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Interstate Wire Corporation
Attn: Neal Houbolt
3727 North Division Street
Morris, Illinois 60450

Application No.: 05030104

I.D. No.: 063060ADB

Applicant's Designation:

Date Received: March 30, 2005

Subject: Plastic Wire Coating

Date Issued: November 22, 2005

Expiration Date: November 17, 2010

Location: 3727 North Division Street, Morris

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 19 printing units, 6 extruder lines, 3 lacquer coating lines, ink removal tank, and vacuum conveyor system controlled by cyclone filters and vacuum pump filters 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.: 100 tons/year for NO_x, CO and VOM; 25 tons/year for combined HAPs; and 10 tons/year per individual HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- 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 (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 3a. Pursuant to 35 Ill. Adm. Code 215.206(a)(1) the limitations of 35 Ill. Adm. Code Part 215 Subpart F, do not apply to this source because the volatile organic material (VOM) emissions as limited by this permit do not exceed 25 tons/year.

- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) or organic material into the atmosphere from any emission unit. If no odor nuisance exists the limitation of this subpart shall apply only to photochemically reactive material.
- 4a. 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.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- 5. Emissions and operation of the six extruder lines shall not exceed the following limits:

<u>Process</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>Emission Factor (Lbs/mmmlbs)</u>	<u>HAPs (Other than Toluene) (Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Extrusion Lines					
PVC Resin	230	1,850	6.35	2.92	0.01
Cross-Link Resin	250	2,000	6.35	3.18	0.01
Silicone Resin Others	12	100	0	0	0
Total				6.10	0.02

<u>Process</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>Emission Factor (Lbs/mmmlbs)</u>	<u>Single HAPs (e.g. Toluene) (Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Silicone Resin Natural	20	150	40.00	1.6	0.01

<u>Process</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>Emission Factor (Lbs/mmmlbs)</u>	<u>VOM Emissions (Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Extrusion Lines					
PVC Resin	230	1,850	128.2	0.03	0.24
Cross-Link Resin	250	2,000	128.2	0.04	0.26
Silicone Resin Natural	20	150	40.00	0.01	0.01
Silicone Resin Others	12	100	10,000	0.13	1.00
Totals				0.21	1.51

These limits are based on emission factors provided by raw material vendors and maximum operations. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. Emissions and operation of the 19 printing units shall not exceed the following limits:

<u>Printing</u>	<u>(Gals/Mo)*</u>	<u>(Gals/Yr)*</u>	<u>Emission Factor (Lbs/Gal)</u>	<u>Combined HAPs</u>	
				<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Ink	42	330	1.10	46.2	0.18 **
Extender	9	72	4.12	<u>37.1</u>	<u>0.15 (MEK)</u>
Total				83.3	0.33

* Represents total material used less material reclaimed.

** HAPs consist of cumene, xylene, and ethyl benzene

b.

<u>Process</u>	<u>(Lbs/Gal)</u>	<u>(Tons/Mo)</u>	<u>VOM Content</u>		<u>VOM Emissions</u>	
			<u>(Tons/Yr)</u>	<u>(% of Wt.)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Printing						
Ink	9.59	0.201	1.582	90.00%	0.18	1.42
Extender	7.17	0.032	0.258	100.00%	<u>0.03</u>	<u>0.26</u>
Total					0.21	1.68

7. Emissions and operation of the lacquer lines shall not exceed the following limits:

<u>Lacquer Lines</u>	<u>(Gals/Mo)*</u>	<u>(Gals/Yr)*</u>	<u>Emission Factor (Lbs/Gal)</u>	<u>Single HAP</u>	
				<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Lacquer Coating	516	4,130	2.88	1,486.09	5.95 (Toluene)
Colorant	250	2,000	2.38	<u>595.00</u>	<u>2.38 (MEK)</u>
Total				2,081.09	8.33

* Represents total material and less material reclaimed.

b.

<u>Process</u>	<u>(Lbs/Gal)</u>	<u>(Ton/Mo)</u>	<u>VOM Content</u>		<u>VOM Emissions</u>	
			<u>(Ton/Yr)</u>	<u>(% of Wt.)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Lacquer Lines						
Lacquer Coating	7.57	1.953	15.632	61.00%	0.19	9.54
Colorant	7.92	0.99	7.920	41.00%	<u>0.41</u>	<u>3.25</u>
Total					1.60	12.79

8. Emissions and operation of the ink removal tank shall not exceed the following limits:

a.	<u>Ink Removal Tank</u>	<u>(Gals/Mo)*</u>	<u>(Gals/Yr)*</u>	Emission	Single HAP	
				<u>Factor</u>	<u>(e.g. Toluene)</u>	
				<u>(Lbs/Gal)</u>	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
	Stripper Solvent	100	798	4.96	496	1.98

* Represents total material used less material reclaimed.

b.	<u>Process</u>	<u>(Lbs/Gal)</u>	<u>(Ton/Mo)</u>	VOM Content		VOM Emissions	
				<u>(Ton/Yr)</u>	<u>(% of Wt.)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
	Ink Removal Tank						
	Stripper Solvent	7.09	0.35	2.83	0.91	0.26	2.57

9a. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.

- i. Amount of resin (each) extruder (tons/month and tons/year);
- ii. Amount of ink, thinner, cleaning solvent, material reclaimed etc., used in printing operations (gallons/month and gallons/year);
- iii. Amount of lacquer coating (gallons/month and gallons/year);
- iv. Amount of solvent used and amount of solvent reclaimed (gallons/month and gallons/year);
- v. HAP and VOM contents for coatings, inks, cleaning solvents, material reclaimed etc.; and
- vi. Monthly and annual VOM and HAP emissions from the source with supporting calculations (all units) (tons/month and tons/year).

b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least 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
9511 West Harrison
Des Plaines, Illinois 60016

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

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

DES:GMK:psj

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

Attachment A - EMISSIONS SUMMARY

This attachment provides a summary of the maximum emissions from this facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 100 tons/year for NO_x and VOM 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>Processes</u>	E M I S S I O N S			
	<u>VOM</u> <u>(Tons/Year)</u>	<u>Single HAP</u> <u>(Toluene)</u> <u>(Tons/Year)</u>	<u>(Other Than</u> <u>Toluene)</u> <u>(Tons/Year)</u>	<u>Combined</u> <u>HAPs</u> <u>(Tons/Year)</u>
Extrusion Lines				
PVC Resin	0.24	----	0.01	0.01
Cross-Link Resin	0.26	----	0.01	0.01
Silicone Resin Natural	0.01	0.01	----	0.01
Silicone Resin Others	1.00		----	----
Printing				
Ink	1.42	----	0.18	0.18
Extender	0.26	----	0.15	0.15
Lacquer Lines				
Lacquer Coating	9.54	5.95	----	5.95
Colorant	3.25	----	2.38	2.38
Ink Removal Tank				
Stripper Solvent	<u>2.57</u>	<u>1.98</u>	<u>----</u>	<u>1.98</u>
Totals	<u>18.55</u>	<u>7.94</u>	<u>2.73</u>	<u>10.67</u>

GMK:psj