

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Churchill Cabinet Company  
Attn: Mr. Roger Duba, President  
4616 West 19th Street  
Cicero, Illinois 60804

<u>Application No.:</u> 76030017	<u>I.D. No.:</u> 031051AAN
<u>Applicant's Designation:</u> 1578A4296	<u>Date Received:</u> July 26, 2006
<u>Subject:</u> Wood Product Manufacturing	
<u>Date Issued:</u> January 15, 2008	<u>Expiration Date:</u> January 15, 2013
<u>Location:</u> 4616 West 19th Street, Cicero, Cook County, 60804	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two (2) natural gas-fired boilers, three (3) natural gas-fired heaters, five (5) paint spray booths, six (6) silk screen units, pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emission of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for total HAPs), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Program (CAAPP) permit.
  - 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, 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 the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.

- iv. This permit is issued based upon the plant not being subject to the requirements of 35 Ill. Adm. Code 218.204(1) (Wood Furniture Coating), 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 permit(s) 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 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program,
- 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. This permit is issued based upon the coating operations not being subject to the emission limitations of 35 Ill. Adm. Code Part 218, Subpart F: Coating Operations, because the source does not meet the applicability of 35 Ill. Adm. Code 218.208(b). In particular, the source has:
- i. Maximum theoretical emissions of VOM from emission units not regulated by 35 Ill. Adm. Code 218 Subpart F that are less than 90.7 Mg (100 tons) per year; and
  - ii. A potential to emit for VOM from emission units not regulated by 35 Ill. Adm. Code 218 Subpart F that is less than 22.7 Mg (25 tons) per year.

- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kgs/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart K: Use of Organic Material, shall apply only to photochemically reactive material.
- 4a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. Natural gas shall be the only fuel used in the boilers and heaters at this source. Use of any fuel other than natural gas requires a construction permit from the Illinois EPA.
- 5a. Emissions of plant-wide coating operations shall not exceed the following limits.

Coating Usage		VOM Content	VOM Emissions	
(Gallons/Month)	(Gallons/Year)	(Lbs/Gallon)	(Tons/Month)	(Tons/Year)
1,680	15,867	5.0	0.7	6.3

These limits are based on maximum coating usage and the maximum VOM content.

- b. Emissions of plant-wide thinning and cleanup operations shall not exceed the following limits:

Thinner and Solvent Usage		VOM Content	VOM Emissions	
(Gallons/Month)	(Gallons/Year)	(Lbs/Gallon)	(Tons/Month)	(Tons/Year)
756	4,282	7.38	2.8	15.8

These limits are based on maximum thinner and solvent usage and the maximum VOM content.

- c. Emissions and operation of the boilers and heaters shall not exceed the following limits:

Natural Gas Usage: 4 mmscf/month, 40 mmscf/year

Pollutant	Emission Factor	Emissions	
	(Lbs/mmscf)	(Tons/Month)	(Tons/Year)
NO <sub>x</sub>	100	0.2	2.0
CO	84	0.2	1.7

These limits are based on maximum natural gas usage and standard AP-42 emission factors.

- d. Emissions of hazardous air pollutants (HAPs), as listed in Section 112(b) of the Clean Air Act, shall not exceed the following limits:

<u>Item</u>	<u>HAPs Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Individual HAP	0.8	9.5
All HAPs	1.9	22.1

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

6. 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 (CAAPP) permit from the Illinois EPA.
7. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 8a. 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 8(a) shall be performed by a qualified independent testing service.
9. 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.
- 10a. 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(b)(4), any owner or operator of a coating line which is exempted from the limitations of 35 Ill. Adm. Code 218.204 because of 35 Ill. Adm. Code 218.208(b) shall collect and record all of the following information for each coating line and maintain the information at the source for a period of three years:
    - i. The name and identification number of each coating as applied on each coating line; and
    - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on each coating line on a monthly basis.
  - c. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
    - i. Name, usage, VOM content and HAP content of all coatings, thinners, and cleanup solvents (gallons/month, gallons/year, lbs/gallon, and lbs/gallon);
    - ii. Natural gas usage (mmscf/month and mmscf/year); and
    - iii. Monthly and annual CO, NO<sub>x</sub>, PM, VOM, and HAP emissions from the source with supporting calculations (tons/month and tons/year).
  - d. 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.
11. If there is an exceedance of or a deviation from the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant

records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.

12. 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.
13. Pursuant to 35 Ill. Adm. Code 218.211(b)(6), any owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.204(1) because of 35 Ill. Adm. Code 218.208(b) shall notify the Illinois EPA if the source's VOM emissions exceed the limitations of 35 Ill. Adm. Code 218.208(b) by sending a copy of calculations showing such an exceedance within 30 days after the change occurs.
14. 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

It should be noted that the baghouse, and cyclones are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(jj).

If you have any questions on this permit, please call Jocelyn Stakely at 217/782-2113.

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

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

ECB:JRS:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the wood product manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels (e.g., 100 tons/year of VOM, 10 tons/year of single HAP and 25 tons/year of total 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>Equipment</u>	<u>HAPs</u>						
	<u>VOM</u> <u>(T/Yr)</u>	<u>Combined</u> <u>(T/Yr)</u>	<u>Single</u> <u>(T/Yr)</u>	<u>NO<sub>x</sub></u> <u>(T/Yr)</u>	<u>PM</u> <u>(T/Yr)</u>	<u>CO</u> <u>(T/Yr)</u>	<u>SO<sub>2</sub></u> <u>T/Yr)</u>
Coating Operations	6.3	----	----	----	----	----	----
Thinning and Cleanup Operations	15.8	----	----	----	----	----	----
Boilers and Heaters	----	----	----	<u>2.0</u>	----	<u>1.7</u>	----
Totals:	<u>22.1</u>	<u>22.1</u>	<u>9.5</u>	<u>2.0</u>	----	<u>1.7</u>	----

JRS:psj