



- b. Emissions of hazardous air pollutants (HAPs) from the six lacquer coating lines shall not exceed the following limits:

<u>Pollutant</u>	<u>E M I S S I O N S</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Year)</u>
Single HAP (e.g. Toluene)	1.0	9.4
Total HAPs	1.4	16.0

- c. These limits are based on the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 3a. This permit is issued based on negligible emissions of volatile organic material from the three polypropylene film coating operations. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- b. This permit is issued based on negligible emissions of volatile organic material from the powder coating line. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
4. The Permittee shall keep records each month of the following items for each coating line:
- The quantity of each coating containing VOM and/or HAP that is used (gal/month);
  - A list giving the name and identification number of each coating as applied, dilution solvent, clean-up solvent, and any other material containing VOM and/or HAP;
  - VOM content in lbs VOM per gallon of coating as applied (less water and any compounds which are specifically exempt from the definition of VOM) for each material used containing VOM;
  - Single HAP content in lbs HAP per gallon of coating as applied for each material used containing toluene;
  - Total HAP content in lbs HAPs per gallon of coating as applied for each material used containing HAPs; and
  - VOM and HAP emissions (ton/month and ton/year).
- 5a. This permit is issued based upon emissions of organic material being less than 8 lbs/hour from each individual coating line pursuant to 35 Ill. Adm. Code 215.301, if emissions are from photochemically reactive material as defined in 35 Ill. Adm. Code 211.4690.
- b. In addition to the records required by Condition 4, the Permittee shall maintain records of the following items, on a per coating line basis,

so as to verify compliance with the limits in this condition:

- i. Identification and quantity, of each photochemically reactive coating used (gallons/month);
  - ii. Organic material content by volume as applied (less water and any compounds which are specifically exempt from the definition of organic material) for each material used containing organic material (lbs organic material per gallon of coating);
  - iii. Total organic material emissions attributable to photochemically reactive material for each line (lbs/month);
  - iv. Total amount of time that the line is used while utilizing photochemically reactive coating, (hours/month);
  - v. Hourly emission rate per line when using photochemically reactive material, as determined by record (iii) divided by record (iv) (lb/hour).
6. 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.
7. 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.
8. 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.
9. 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  
2009 Mall Street  
Collinsville, Illinois 62234

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
  - a. Quantification of total annual HAP emissions, tons/year
  - b. Breakdown of individual HAP emissions, tons/year

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

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

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

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cc: Illinois EPA, FOS Region 3  
Illinois EPA, Compliance Unit  
USEPA - Lotus Notes

Attachment A

This attachment provides a summary of the maximum emissions of the 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 plant. This is using 12,977 gallons/year of color coating with a maximum VOM content of 4.87 lb/gal, 14,872 gallons/year of clear coating with a maximum VOM content of 4.89 lb/gal, 7,150 gallons/year of lacquer thinner with a maximum VOM content of 6.59 lb/gal, induction welding on the weld lines, and low temperature operation of the polypropylene coating operation. The resulting maximum emissions are well below the levels (i. e., 100 tons/year of VOM, 10 tons/year of an individual HAP, and 25 tons/year of total HAPs), at which this source would be considered major 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, e.g., less paint used, and control measures are more effective than required in this permit.

Lacquer Coating Lines

<u>Material</u>	<u>Material Usage</u> <u>(Gal/Mo)</u>	<u>Usage</u> <u>(Gal/Yr)</u>	<u>VOM</u> <u>Content</u> <u>(Lb/Gal)</u>	<u>VOM Emissions</u>	
				<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Color Lacquer	1,081	12,977	4.87	2.6	31.6
Clear Lacquer	1,240	14,872	4.89	3.0	36.4
Lacquer Thinner	600	7,150	6.59	<u>2.0</u>	<u>23.6</u>
			Total:	7.6	91.6

Polypropylene Film Coating Operation

VOM Emissions: 0.44 ton/yr  
Particulate Matter Emissions: 0.44 ton/yr

Powder Coat Operation

VOM Emissions: 0.44 ton/yr  
Particulate Matter Emissions: 0.9 ton/yr

Roll Form/Induction Weld Lines

Particulate Matter Emissions: 1.8 tons/yr

Total Emissions Summary

<u>Pollutant</u>	<u>Tons/Year</u>
VOM	92.4
Particulate	3.1

HAP Summary

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Year)</u>
Single HAP (e.g. Toluene)	1.0	9.4
Total HAPs	1.4	16.0

JPB:jar

## I. INTRODUCTION

An application has been voluntarily submitted for renewal of a federally enforceable state operating permit for this wood dowel coating operation in order to incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions. The proposed limits would be accompanied by recordkeeping and reporting requirements to assure that the operation is operated as a non-major source. These conditions would be enforceable by both the State of Illinois and the United States Environmental Protection Agency.

## II. SOURCE DESCRIPTION

This facility coats wood dowels that are then used as broom handles. The facility utilizes six coating lines to apply clear lacquer or color lacquer to the wood dowels. They also manufacture metal broom handles that are produced by means of rolling sheets of metal into a cylinder and then welding the seam together and coating the metal cylinder with a polypropylene material.

## III. EMISSIONS

The principal air contaminant for this facility is volatile organic material (VOM). It is generated during the coating process. A portion of the VOM is comprised of hazardous air pollutants (HAP), such as toluene.

There will also be some VOM emissions generated from the polypropylene film coating operation. These emissions will be minimal due to the low temperature of the operation and the low percentage of volatile material in the plastic.

The proposed permit limits the annual emissions of VOM from the facility to less than 100 tons/year. The proposed permit also limits the annual emissions of HAPs from the facility to less than 10 tons/year for an individual HAP and less than 25 tons/year for all HAPs combined.

## IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for sources of volatile organic material emissions at all subject sources. This site readily complies with all applicable Board standards.

35 Ill. Adm. Code 215.301 requires that no person shall cause or allow the discharge of more than 8 lb/hour of organic material into the atmosphere from this emission source if a photochemically reactive material is used.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this plant will be operated as a non-major source. This would exempt this facility from the requirements of the Clean Air Act Permit Program. The permit sets limitations on the material usage of all coatings used to limit VOM and HAP emissions. These limitations are consistent with the historical operation and capacity of the plant.

The permit conditions also establish appropriate compliance procedures, including recordkeeping and reporting requirements. The Permittee must carry out these procedures on an ongoing basis to demonstrate that the plant is operated within the limitations set by the permit and emissions are properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois Environmental Protection Agency's (Agency) preliminary determination that the facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Agency is therefore proposing to issue a permit with federally enforceable limits for this operation.

Comments are requested on this proposed action by the Agency and the proposed conditions on the draft permit. If substantial public concern is shown in this matter, the Agency will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.