

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Concord Industries/Rock - Tenn Co.
Attn: Kent Boyd
2607 North 25th Avenue
Franklin Park, Illinois 60131

Application No.: 87010034 I.D. No.: 031096ALI
Applicant's Designation: Date Received: March 14, 2001
Subject: Thermoforming Process
Date Issued: July 26, 2001 Expiration Date: July 26, 2006
Location: Chicago Plastics, 2607 North 25th Avenue, Franklin Park

Permit is hereby granted to the above designated Permittee to OPERATE emission sources (s) and/or air pollution control equipment consisting of four storage silos, five dryers (one gas-fired), three crystallizers (one gas-fired), seven extruders, fourteen thermoformers, two cold cleaning degreasers, and twenty seven natural gas combustion sources 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., 25 tons/year for VOM, 10 tons/year for any single HAP and 25 tons/year of a totaled HAP), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
 - 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) issued for this location.
2. Emissions and operation of the extruders, thermoformers, and degreasers shall not exceed the following limits:

<u>Material</u>	<u>VOM Content</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
		<u>(Per Month)</u>	<u>(Per Year)</u>	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
Polystyrene	0.03 wt.%	3,000 tons	27,000 tons	1,800 (HAP)	8.1
Polypropylene	0.035 wt.%	3,000 tons	28,000 tons	2,100	9.8
Degreaser Solvent	6.72 lb/gal	80 gals	760 gals	538	2.6
Mold Release Agent (Formasil)	4.1 lb/gal	150 gals	1,500 gals	620	3.1
			Total:	5,058	23.6

These limits define the potential emissions of VOM and are based on the maximum usage rate, maximum VOM content, and standard AP-42 emission factors. Compliance with all annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

3. The permit is issued based on thermoforming operations not being subject to the requirements of 218. 986 pursuant to 35 Ill. Adm. Code 218.980. This is a consequence of the voluntary limits placed on operations and emissions contained in this federally enforceable permit.
- 4a. Emissions and operation of all fuel combustion emission sources shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo) (mmscf/Yr)</u>		<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
				<u>Factor</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
				<u>(Lb/mmcsf)</u>		
Natural Gas	15	75	NO _x	100	0.75	3.8
			CO	84	0.63	3.2
			TSP	7.6	0.1	0.3
			VOM	5.5	0.1	0.2

These limits define the potential emissions of NO_x, CO, TSP, SO₂, and VOM and are based on maximum fuel usage and standard emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel used in all the fuel combustion sources. Use of any other fuel other than natural gas requires a permit revision.
5. Emissions of particulate matter from the four storage silos shall not exceed 2.8 tons/year. This limit is based on the allowable emission limit (8.7 lb/hr) at the maximum operating rate of 10 ton/hr and the 650 hours of operation per year. 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 from five dryers and three crystallizers. For this purpose, emissions from each group of equipment shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
7. 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.

- 8a. 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, pursuant to 35 Ill. Adm. Code 212.301.
- b. 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.
9. Pursuant to 35 Ill Adm. Code 218.182 (c), the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F).
10. The Permittee shall comply with the following operating requirements for cold cleaning degreasers, pursuant to 35 Ill. Adm. Code 218.182:
 - a. Waste solvent shall be stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - b. The cover of the degreaser shall be closed when parts are not being handled and parts are drained until dripping ceases.
 - c. The degreaser must be equipped with a cover which is closed whenever parts are not being handled in the cleaner.
 - d. The degreaser shall be equipped with a device for draining cleaned parts.
 - e. A permanent conspicuous label summarizing the operating procedure must be affixed to the degreaser; and
 - f. If a solvent spray is used, the degreaser must be equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
11. The Permittee shall maintain monthly records of the following for cold cleaning degreasers, pursuant to 35 Ill. Adm. Code 218.182:
 - a. The name and address of the solvent supplier;
 - b. The date of purchase;
 - c. The type of solvent; and
 - d. The vapor pressure of the solvent measured in mmHg at 20°C (68°F).

12. The Permittee shall maintain records of the following items:
 - a. Polystyrene and polypropylene usage (ton/month and ton/year);
 - b. Mold release agent usage (gal/month and gal/year);
 - c. Degreaser solvent usage (gal/month and gal/year);
 - d. VOM content of polystyrene, polypropylene, mold release agent and degreaser solvent (lb/gal or weight %);
 - e. Total natural gas usage (mmscf/mo and mmscf/yr);
 - f. Volatile organic material emissions (lb/month and ton/year); and
 - g. HAP emissions (lb/month and ton/year).
13. 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.
14. 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.
15. 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

16. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
 - a. Polystyrene and polypropylene usage (ton/month and ton/year);
 - b. Solvent and mold release agent usage (gal/month and gal/year);
and
 - c. Total natural gas usage (10^6 scf/year).

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

It should be noted that the permit has been revised to include the operation of two extruders and the usage of polypropylene as a raw material.

If you have any questions on this, please call Tara T. Nguyen-Ede 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 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A

This attachment provides a summary of the maximum emission from the thermoforming plant 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 well below levels, e.g., 25 tons per year of VOM, 10 tons/year of any single HAP and 25 tons/year of a combination of all 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 material is handled, and control measures are more effective than required in this permit.

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