

These limits are based on maximum material usage and VOM contents. Compliance shall be determined from a running total of the previous 12 months data.

- b. Usage and emissions of VOM and HAPs shall be determined from the following equation:

$$E_1 = P \times V_1 - SV_2$$

$$E_2 = P \times H_1 - SH_2$$

Where:

E_1 = Usage and emissions of VOM

E_2 = Usage and emissions of HAPs

P = Amount of each material

V_1 = VOM content of each material purchased

H_1 = HAP content of each material purchased

S = Amount of each material shipped off-site

V_2 = VOM content of each material shipped off-site

H_2 = HAP content of each material shipped offsite

- 3. No person shall cause or allow the emission of carbon monoxide into the atmosphere from each fuel combustion emission source to exceed 200 ppm corrected to 50% excess air in accordance with 35 Ill. Adm. Code 216.121.
- 4a. This permit is issued based on emissions of VOM from each process emission unit not exceeding 8 lb/hour, pursuant to 35 Ill. Adm. Code 218.301.
- b. This permit is issued based on negligible emissions from VOM and HAPs on or in the drums and containers received. For this reason, emissions shall not exceed nominal rates of 0.1 lb/hr and 0.44 tons/yr.
- 5a. Emissions and operation of 5 natural gas-fired burners shall not exceed the following limits:

E M I S S I O N S							
Natural Gas Usage		NO _x		CO		VOM	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
2	20	0.1	1	0.09	0.84	0.006	0.06

These limits are based on standard AP-42 emission factors. Compliance shall be determined from a running total of the previous 12 months data.

- b. Natural gas shall be the only fuel fired in all fuel combustion emission units at the plant.
- 6a. The Permittee shall keep monthly records of the following items:
 - i. Natural gas usage (mmscf/mo and mmscf/yr).
- b. The Permittee shall keep daily records of the following items:
 - i. Type and amounts of materials used and shipped off-site for each emission source (gal/day, gal/mo and gal/yr);
 - ii. VOM and HAP contents of each material purchased (lb/gal or wt. %);
 - iii. VOM and HAP contents of each material shipped off-site (lb/gal or wt. %); and
 - iv. Operating hours for each emission source (hr/mo and hr/yr).
- c. VOM and HAP emission calculations.
- 7. 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.
- 8. 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.
- 9. 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.
- 10. 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

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Natural gas usage (mmscf/mo and mmscf/yr); type and amounts of materials used and shipped off-site for each emission source (gal/mo and gal/yr); VOM and HAP contents of each material purchased; and VOM and HAP contents of each material shipped off-site (lb/gal or wt. %); operating hours for each emission source; and VOM and HAP emission calculations (gal/mo and gal/yr).

Please note that all grinding and non-VOM washing are exempt from state permitting requirements, pursuant to 35 Ill. Adm. Code 201.146(aa) and (oo), respectively.

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

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

DES:RBS:psj

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

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the drum and container reconditioning 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. This is using less than 25 tons/year of VOM, 25 tons/year of combined HAPs and 10 tons/year of each single HAP. The resulting maximum emissions are just below the levels, e.g., 25 tons per year of VOM, 25 tons per year of combined HAPs and 10 tons per year of each single HAP 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.

1. 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.

2. Emissions and operation of drum label remover application, exterior drum solvent cleaning and tote processing (including all clean-up operations) shall not exceed the following:

<u>Process</u>	<u>VOM and HAP Usage and Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Drum Label Remover Application	1.4	13.8
Exterior Drum Solvent Cleaning	0.8	8.23
IBC Label Remover	<u>0.3</u>	<u>2.4</u>
Totals:	2.6	24.43

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3. This permit is issued based on negligible emissions from VOM and HAPs on or in the drums and containers received. For this reason, emissions shall not exceed nominal rates of 0.1 lb/hr and 0.44 tons/yr.

4. Emissions and operation of 5 natural gas-fired burners shall not exceed the following limits:

E M I S S I O N S							
<u>Natural Gas Usage</u>		<u>NO_x</u>		<u>CO</u>		<u>VOM</u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
2	20	0.1	1	0.09	0.84	0.006	0.06

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These limits are based on standard AP-42 emission factors. Compliance shall be determined from a running total of the previous 12 months data.

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