

FINAL DRAFT/PROPOSED RENEWAL CAAPP PERMIT
Replogle Globes, Inc.
Application No.: 95120175
I.D. No.: 031030ACM
March 26, 2004

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Replogle Globes, Inc.
Attn: Edward J. Dieschbourg/Treasurer
2801 South 25th Avenue
Broadview, Illinois 60153

Application No.: 95120175 I.D. No.: 031030ACM
Applicant's Designation: Date Received: March 14, 2003
Operation of: Geographic World Globes Manufacturer
Date Issued: Expiration Date²:
Source Location: 2801 South 25th Avenue, Broadview, Cook
Responsible Official: Edward J. Dieschbourg/ Treasurer

This permit is hereby granted to the above-designated Permittee to operate a Geographic World Globe Manufacturing operation, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Sunil Suthar at 217/782-2113.

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

DES:SIS:psj

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

1 This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

2 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Replogle Globes, Inc.
2801 South 25th Avenue
Broadview, Illinois 60155
(708) 343-0900

I.D. No.: 031030ACM
Standard Industrial Classification: 3999, Manufacturing Industry

1.2 Owner/Parent Company

Replogle Globes, Inc.
2801 South 25th Avenue
Broadview, Illinois 60155

1.3 Operator

Replogle Globes, Inc.
2801 South 25th Avenue
Broadview, Illinois 60155

Edward J. Dieschbourg/Treasurer
(815) 485-2564

1.4 General Source Description

Replogle Globes, Inc. is located at 2801 South 25th Avenue in Broadview, Illinois. The source is a manufacturer of geographic globes. Three processes exist at the source; metal parts operation (including parts washing and coating), plastic injection molding, and wood line (including woodworking and coating). The metal parts operation consists of receiving sheet steel, bar metal, and pre-pressed metal bases which are then pressed, washed, painted, and oven cured before moving to the assembly and packing areas. The injection molding consists of a paper paint spray booth and a solvent globe joining operation, where the globe hemispheres are joined. The wood line works raw lumber into various size bases and parts, which are then coated. The source also operates three natural gas fired boilers (only one boiler is operational at any given time) to provide building heat.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
gal	gallons
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilograms
kW	kilowatts
lb	pound
mG	megagrams
mmBtu	Million British thermal units
mo	month
MSDS	Material Safety Data Sheet
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
SO ₂	Sulfur Dioxide
T	tons
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound
VOM	Volatile Organic Material
Wt. %	Weight percent
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Fugitive particulate emissions from the parking area that never exceed 1 lb/hour.

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Two stage metal parts washer with emissions that never exceed 0.1 lb/hour or 0.44 tons/year of any regulated pollutant in the absence of air pollution control equipment and that do not emit any pollutant listed as hazardous pursuant to Section 112(b) of the Clean Air Act.

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; [35 IAC 201.210(a)(4)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

- 3.2.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

- 3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type

addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 01	Group 1 Boilers: Natural Gas Fired Fuel Combustion Units	1958	None
Unit 02	Group 2 Coating Operations: See Sub-Groups		
	Sub-Group 2a Paper Coating Operations: 1 Dry Filter Paint Spray Booth	1985	Dry Filter
	Sub-Group 2b Metal Coating Operations: Electrostatic Paint Spray Booth with bake oven	1985	None
	Sub-Group 2c Wood Coating Operations: 7 Paint Spray Booths	1985	Dry Filters
Unit 03	Group 3 Joining Operation: Joining Globe Hemispheres with solvent	1985, 1990	None
Unit 04	Group 4 Woodworking Operations: Sanding, sawing, cutting, and grinding	1985	Dust Collector

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. 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 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5
- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
 - b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or

demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

- 5.3.1 This permit is issued based on the source not being subject to 40 CFR 63, Subpart JJ, because the source is not a major source of HAPs. (See also Condition 5.5.2.)

5.3.2 This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart G, because the source is exempt pursuant to 35 IAC Part 218.209.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	38.00
Sulfur Dioxide (SO ₂)	0.02
Particulate Matter (PM)	1.12
Nitrogen Oxides (NO _x)	2.62
HAP, not included in VOM or PM	---
TOTAL	41.76

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to verify that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63, Subpart JJ, and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5.2:

- a. Records maintained on a monthly basis for the previous month:
 - i. Total usage of each individual HAP, and total combined HAPs from the source, tons/month; and
 - ii. Total emissions of each individual HAP, and total combined HAPs from the source, tons/month, with supporting calculations.

5.6.3 Records for Operating Scenarios

The Permittee shall maintain records of the following items to allow verification that all coatings applied in any paint spray booth at the source are in compliance with 35 IAC Part 218.204(1)(1-7):

- a. The name and identification number of each coating as applied on the affected paint spray booth;
- b. The usage of each coating, in units of gallons/month and gallons/year;
- c. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected paint spray booth;
- d. The applicable VOM limit for each applied coating, pursuant to 35 IAC Part 218.204;
- e. VOM emissions calculations for each paint spray booth (lb/mo & ton/yr);
- f. Records of the testing of VOM and HAP content (wt. %) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- g. The operating schedule of the affected paint spray booth; and
- h. Results of filter inspections and dates of replacements made.

5.6.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified

by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and

- b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

Paint Spray Booths

- a. The Permittee is authorized to utilize any coating in any of the paint spray booths at this source provided that the materials are tested in accordance with Conditions 7.2.7, the source wide emission limitations in Condition 5.5.1 are not exceeded, and the affected paint spray booths remains in compliance with 35 IAC Part 218.204; and
- b. The Permittee shall keep records as indicated in Condition 5.6.3 above to ensure compliance with 35 IAC Part 218.204.

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating HAP Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

- a. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permit. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). A source may also transfer or sell the ATUs that it holds to other sources or participants (35 IAC 205.630).

This section becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.2 Applicability

Emissions of VOM from the source for the seasonal allotment period of May 1 through September 30 of each year shall not exceed 15 tons, not including VOM from insignificant units and activities as identified in Section 3 of this permit. This limitation is established at the request of the source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS) pursuant to 35 IAC 205.205.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine of compliance with the above limitation:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate to determine VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions in tons during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit;
 - iii. Total VOM emissions from the source in tons during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the annual emissions report by (October 31) of each year, reporting emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC 205.200, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Boilers
 Control: None

7.1.1 Description

The Permittee is a manufacturer of finished geographical globes. The boilers are used to provide heat to the building. Only one boiler will be operated at any given time.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Control Equipment
Unit 01	Cleaver Brooks Boiler B1 14.7 mmBtu/hr	1958	None
	Cleaver Brooks Boiler B2 14.7 mmBtu/hr	1958	None
	Cleaver Brooks Boiler B3 14.7 mmBtu/hr	1958	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions is a fuel combustion unit that is fired with natural gas, with a heat input capacity greater than 10 mmBtu/hr but less than 100 mmBtu/hr. As of the "date issued" as shown on page 1 of this permit, the affected boiler is identified in Condition 7.1.2.
- b. Affected boilers are subject to 35 IAC 216.121, No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

7.1.4 Non-Applicability of Regulations of Concern

- a. Affected boiler is not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of each affected boiler is less than 73.2 MW (250 mmBtu/hr).

- b. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.1.5 Operational and Production Limits and Work Practices

Each affected boiler shall only be operated with natural gas as the fuel.

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1 and 7.1.5 pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for the boilers (Therms/month and Therms/year); and
- b. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected boilers, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Emissions of NO_x, PM, SO₂, or VOM from the affected boilers in excess of the limits specified in Condition 5.5.1 based on the current months records

plus the preceding 11 months within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with the emission limits in Conditions 5.5.1 and 5.5.3 shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:
 - i. Emissions from the affected boilers burning natural gas shall be calculated based on the following emission factors:

Emission Factor	
<u>Pollutant</u>	<u>(lb/10⁶ ft³)</u>
PM	14
NO _x	140
SO ₂	0.6
VOM	2.8

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (10 - <100 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on Total Organic Carbon (TOC) factor corrected for 52% methane.

Boiler Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

Conversion factors of 1,000 Btu/ft³ and 1 therm/100,000 Btu were used.

- b. Compliance provisions addressing the particulate matter limitations in Condition 7.1.3 are not set by this permit as compliance is assumed to be achieved by the normal work-practices, proper operation, and maintenance activities of an affected boiler.

7.2 Unit 02: Paint Spray Booths
 Control: 01 Paint Filter

7.2.1 Description

The Permittee is a manufacturer of finished geographical globes. The facility applies coatings to three different substrates: paper, metal, and wood. Coating operations are conducted with paint spray booths and cleanup solvents.

7.2.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Control Equipment
Unit 02	Paper Coating Paint Spray Booth IG3	Dry Paint Filter
	Finished Metal Paint Spray Booth MF-2, 3	Paint Filter
	Wood Paint Spray Booth WL-1	Paint Filter
	Wood Paint Spray Booth WL-2	Paint Filter
	Wood Paint Spray Booth WL-3	Paint Filter
	Wood Paint Spray Booth WL-4	Paint Filter
	Wood Paint Spray Booth WL-5	Paint Filter
	Wood Paint Spray Booth WL-6	Paint Filter
Wood Paint Spray Booth WL-7	Paint Filter	

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected paper paint spray booth" for the purpose of these unit specific conditions is a coating operation that includes a spray booth which is used to apply air dried coating to paper. As of the "date issued" as shown on page 1 of this permit, the affected paint spray booths are identified in Condition 7.2.2.
- b. An "affected metal paint spray booth" for the purpose of these unit specific conditions is a coating operation that includes an electrostatic paint spray booth which is used to apply coating to metal, which is then cured in a bake oven. As of the "date issued" as shown on page 1 of this permit, the affected paint spray booths are identified in Condition 7.2.2.
- c. An "affected wood paint spray booth" for the purpose of these unit specific conditions is a coating

operation that includes a spray booth which is used to apply air dried coating to wood. As of the "date issued" as shown on page 1 of this permit, the affected paint spray booths are identified in Condition 7.2.2.

d. Each affected paint spray booth (paper, metal, and wood) at the source is subject to 35 IAC 212.321(a), which requires that:

- i. 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, 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 IAC 212.321 [35 IAC 212.321(a)].
- ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected paint spray booths shall not exceed the allowable emission rates specified in the following equation

$$E = A(P)^B$$

where:

P = process weight rate; and,
 E = allowable emission rate; and,

- 1. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in
kilograms or pounds per hour.

[35 IAC 212.321]

e. Each affected paper paint spray booth at the source is subject to 35 IAC 218.204(c) for paper coatings which provides that:

i. No owner or operator of an affected paper paint spray booth shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to paper. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>Coatings</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Paper Coating	0.28	2.3

ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

[35 IAC 218.204]

f. Each affected metal paint spray booth at the source is subject to 35 IAC 218.204(j) for metal coatings which provides that:

i. No owner or operator of an affected paint spray booth shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

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<u>Coatings</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
1. Clear Coating	0.52	4.3
2. Extreme performance coating		
Air dried	0.42	3.5
Baked	0.40	3.3
3. Steel pail and drum interior coating		
	0.52	4.3
4. All other coatings		
Air dried	0.40	3.3
Baked	0.34	2.8
5. Marine engine coating		
Air dried	0.42	3.5
Baked		
Primer/Topcoat	0.42	3.5
Corrosion resistant basecoat		
	0.28	2.3
Clear Coating	0.52	4.3
6. Metallic Coating		
Air dried	0.42	3.5
Baked	0.36	3.0
7. Definitions		
A. For purposes of subsection 218.204(j) (5) of this Section, the following terms are defined:		
i. "Corrosion resistant basecoat" means, for purposes of subsection 218.204(j) (5) (B) (ii) of this Section, a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance.		

ii. "Electrodeposition process" means for the purposes of subsection 218.204(j) (5) of this Section, a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created.

iii. "Marine engine coating" means for the purposes of subsection 218.204(j) (5) of this Section, any extreme performance protective, decorative or functional coating applied to an engine that is used to propel watercraft.

B. For purposes of subsection 218.204(j) (6) of this Section, "metallic coating" means a coating which contains more than 1/4 lb/gal of metal particles, as applied.

ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

[35 IAC 218.204]

g. Each affected wood paint spray booth at the source is subject to 35 IAC 218.204(1) (1-4) for wood furniture coatings which provides that:

i. On or after March 15, 1998, wood furniture sealers and topcoats must comply with one of the limitations specified below:

<u>Coatings</u>	<u>kg VOM/ kg solids</u>	<u>lb VOM/ lb solids</u>
Topcoat	0.8	0.8

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<u>Coatings</u>	<u>kg VOM/ kg solids</u>	<u>lb VOM/ lb solids</u>
-----------------	------------------------------	------------------------------

Sealers and Topcoats
with the following limits:

- | | | |
|--|-----|-----|
| A. Non-acid-cured alkyd amino vinyl sealer | 1.9 | 1.9 |
| B. Non-acid-cured alkyd amino conversion varnish | 1.8 | 1.8 |
| C. Acid-cured alkyd amino vinyl sealer | 2.3 | 2.3 |
| D. Acid-cured alkyd amino conversion varnish | 2.0 | 2.0 |

- ii. On or after March 15, 1998, wood furniture coatings must comply with the limitations specified below:

<u>Coatings</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Opaque stain	0.56	4.7
Non-topcoat pigmented coat	0.60	5.0
Repair Coat	0.67	5.6
Semi-transparent stain	0.79	6.6
Wash coat	0.73	6.1

- iii. On or after March 15, 1998, wood furniture coatings must comply with the limitations specified below:

- A. No source subject to the limitations of 35 IAC 218.204 (1) (1, 2, or 3) and utilizing one or more wood furniture coating spray booths shall use strippable

spray booth coatings containing more than 0.8 kg VOM/kg solids (0.8 lb VOM/lb solids), as applied.

- B. Any source subject to the limitations of 35 IAC 218.204 (1)(1, 2, A or B) and utilizing one or more continuous coaters shall, for each continuous coater, use an initial coating which complies with the limitations of 35 IAC 218.204 (1)(1, 2, A or B). The viscosity of the coating in each reservoir shall always be greater than or equal to the viscosity of the initial coating in the reservoir. The owner or operator shall:

1. Monitor viscosity of the coating in the reservoir with a viscosity meter or by testing the coating in the reservoir each time solvent is added.

[35 IAC 218.204]

7.2.4 Non-Applicable Regulations of Regulations of Concern

- a. Each affected paint spray booth (paper, metal, and wood) is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material which excludes affected paint spray booths from this requirement.
- b. This permit is issued based on the affected wood paint spray booths not being subject to 40 CFR 63, Subpart JJ, because the source is not a major source of HAPs. (See also Condition 5.5.2.).
- c. This permit is issued based on the affected paper paint spray booth not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected paper paint spray booth does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Operational and Production Limits and Work Practices

- a. Pursuant to 35 IAC 218.217(a), Each owner or operator of a source subject to 35 IAC 218.204 shall not use compounds containing more than 8.0 percent, by weight, of VOM for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent to prepare the booth prior to applying the booth coating.
- b. Pursuant to 35 IAC 218.217(b), Each owner or operator of a source subject to 35 IAC 218.204 shall:
 - i. Keep, store and dispose of all coating, cleaning, and washoff materials in closed containers;
 - ii. Pump or drain all organic solvent used for line cleaning into closed containers;
 - iii. Collect all organic solvent used to clean spray guns in closed containers; and
 - iv. Control emissions from washoff operations by using closed tanks.
- c. Pursuant to 35 IAC 218.217(c), No owner or operator of a source subject to 35 IAC 218.204 shall use conventional air spray guns to apply coating materials to wood furniture except under the circumstances specified below:
 - i. To apply coating materials that have a VOM content no greater than 1.0 kg VOM/kg solids (1.0 lb VOM/lb solids), as applied;
 - ii. For repair coating under the following circumstances:
 - A. The coating materials are applied after the completion of the coating operation;
or

- B. The coating materials are applied after the stain and before any other type of coating material is applied, and the coating materials are applied from a container that has a volume of no more than 2.0 gallons;
 - iii. If the spray gun is aimed and triggered automatically, rather than manually; or
 - iv. If emissions from the finishing application station are directed to a control device pursuant to 35 IAC 218.216.
- d. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- e. An adequate inventory of spare filters shall be maintained.
- f. The coatings shall be applied with high volume, low pressure, spray equipment.
- g. Equipment for collecting VOM solvent and VOM containing cleaning compounds and minimizing evaporation of VOM to the atmosphere shall be used for the cleanup of mixing, storage, and spray equipment.

7.2.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.2.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]

- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected paint spray booth (paper, metal, and wood) shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208, and 218.211(a).

- i. The VOM content of representative coatings "as applied" on the affected paint spray booth (paper, metal, and wood) shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a)
- ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.2.9(b) directly reflect the application of such material and separately account for any additions of solvent.

[35 IAC 218.105(a), 218.208, and 218.211(a)]

7.2.8 Monitoring Requirements

The Permittee shall visually inspect the filters and check for air flow drop on a regular basis in order to ensure proper operation of the filters and the need for replacement.

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each affected paint spray booth to demonstrate compliance with Conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

- a. For each coating and cleaning solvent used on an affected paint spray booth:
 - i. The name and identification number of each coating and cleaning solvent as applied on the affected paint spray booth;
 - ii. The usage of each coating and cleaning solvent, in units of gallons/month and gallons/year.
 - iii. The weight of VOM per volume of each coating and cleaning solvent (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected paint spray booths.

- iv. The weight of HAPs per volume of each coating and cleaning solvent (minus water and any compounds which are specifically exempted) as applied each day on the affected paint spray booths.
- b. Records of the testing of VOM and HAP content (wt. %) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested,
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- c. The reservoir viscosity and the amount and weight of VOM per weight of solids of coating and solvent each time coating or solvent is added;
- d. The operating schedule of the affected paint spray booth;
- e. Results of filter inspections and dates of replacements made; and
- f. Total amount of VOM waste that is collected and shipped off-site, ton/mo and ton/yr.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.2.3(c) (see also 35 IAC 218.204) within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected paint spray booths without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Utilize any coating, thinner, or cleaning solvent in any of the paint spray booths at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected paint spray booth remains in compliance with 35 IAC Part 218.204.

7.2.12 Compliance Procedures

- a. Compliance of each coating with the VOM emission limitations in Condition 7.1.3 shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formulae listed below:

$$\text{Coating VOM Emissions} = V \times D \times U$$

where,

V = percent VOM in the coating (%)

D = overall coating density (lb/gal)

U = overall coating usage (gal/mo & gal/yr)

$$\text{Cleaning Solvent VOM Emissions} = V_1 \times D_1 \times U_1$$

where,

V₁ = percent VOM in the cleaning solvent (%)

D₁ = overall cleaning solvent density (lb/gal)

U₁ = overall cleaning solvent usage (gal/mo & gal/yr)

Total VOM Emissions = Coating Emissions + Cleaning Solvent Emissions - VOM Waste

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- b. Compliance provisions addressing the particulate matter limitations in this section are not set by this permit as compliance is assumed to be achieved by the normal work-practices, proper operation, and maintenance activities of an affected paint spray booth.

7.3 Unit 03: Globe Joining Operation
 Control: None

7.3.1 Description

Three identical units are used to join the injection molded globe hemispheres using a solvent. Only one unit is operated at any given time. This operation also includes any cleanup emissions.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 03	IG-2 Join Injection Molded Globe Parts	None
	IG-5 Join Injection Molded Globe Parts	None
	IG-6 Join Injection Molded Globe Parts	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected globe joining operation" for the purpose of these unit-specific conditions, is any of the three identical solvent joining units.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected globe joining operation not being subject to 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, because the affected globe joining operation does not meet the applicability of 35 IAC 218.920(a) and (b). In particular, the affected globe joining operation has:

- a. Maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year; and

- b. A potential to emit for VOM that is less than 22.7 Mg (25 tons) per year.

7.3.5 Operational and Production Limits and Work Practices

None

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected globe joining operation to demonstrate compliance with Conditions 5.5.1, 7.3.3, and 7.3.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the adhesive usage for the affected globe joining operation, gal/mo and gal/yr;
- b. The VOM content of the adhesive, % by Wt;
- c. Density of adhesives, lb/gal;
- d. The cleanup solvent usage for the affected globe joining operation, gal/mo and gal/yr;
- e. The VOM content of the cleanup solvent, % by Wt;
- f. Density of cleanup solvent, lb/gal;
- g. The aggregate monthly and annual VOM emissions from the affected globe joining operation based on the adhesive and solvent usage, with supporting calculations; and

- h. For compounds determined to be photochemically reactive, the hours of operation and hourly VOM emissions from the affected globe joining operation based on the adhesive and solvent usage and operating hours, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected globe joining operation with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that this emission unit is exempt from those requirements [35 IAC 218.990].
- b. Emissions of VOM from the affected globe joining operation in excess of the limits specified in Condition 7.3.3 or 7.3.6 within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1, 7.3.3, and 7.3.6, VOM emissions from the affected globe joining operation shall be calculated based on the following:

$$\text{VOM (lb)} = (\text{Adhesive Usage, gal}) \times (\text{Adhesive Density, lb/gal}) \times (\text{VOM Content of Adhesive, \% by Wt.}) \\ + (\text{Cleaning Solvent Usage, gal}) \times (\text{Solvent Density, lb/gal})$$

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Hourly emissions may be determined by dividing the
calculated emissions by the operating hours of the globe
joining operation to determine compliance with Condition
7.3.3.

7.4 Unit 04: Woodworking Operations
 Control: Dust Collectors

7.4.1 Description

Woodworking operations consist of processing raw lumber and producing small bases and wood stands. Such operations include sanding, sawing, cutting, and grinding. All operations are controlled by a dust collector

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 04	WW1 Woodworking Operation	Dust collector

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected woodworking operation" for the purpose of these unit-specific conditions, is a woodworking operation consisting of saws, cutters, grinders, and sanders controlled by a dust collector that are subject to 35 IAC 212 Subpart K.
- b. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source, pursuant to 35 IAC 212.301.
- c. Each affected woodworking operation is subject to the emission limits identified in Condition 5.2.2.

7.4.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected woodworking operations not being subject to 35 IAC 212.321 because 35 IAC 212.681 exempts the source from these requirements.

7.4.5 Control Requirements

The Permittee shall operate, maintain, and replace the dust collector filters in a manner that assures compliance with the conditions of this section.

7.4.6 Emission Limitations

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source, pursuant to 35 IAC 212.301.
- b. There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Operating Requirements

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, pursuant to 35 IAC 212.307.

7.4.8 Inspection Requirements

The Permittee shall visually inspect the filters and check the pressure drop on a regular basis in order to ensure proper operation of the dust collectors and the need for replacement.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected woodworking operation to demonstrate compliance with Conditions 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Inlet flow rate and control efficiency of the dust collectors; and
- b. A maintenance and repair log for each dust collector, listing each activity performed with date.
- c. Results of filter inspections and dates of replacements made.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected woodworking operation with the permit requirements as

follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance provisions addressing the particulate matter limitations in this section are not set by this permit as compliance is assumed to be achieved by the normal work-practices, proper operation, and maintenance activities of an affected woodworking operation.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an

amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12) (a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7) (f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

- Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Regional Field Office

- Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

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iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or

resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for

continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7) (o) (iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15) (a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

SIS:psj

10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

FINAL DRAFT/PROPOSED RENEWAL CAAPP PERMIT
Replogle Globes, Inc.
Application No.: 95120175
I.D. No.: 031030ACM
March 26, 2004

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
 Division Of Air Pollution Control -- Permit Section
 P.O. Box 19506
 Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	_____
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked

yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

FINAL DRAFT/PROPOSED RENEWAL CAAPP PERMIT
Replogle Globes, Inc.
Application No.: 95120175
I.D. No.: 031030ACM
March 26, 2004

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

SIS:psj

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Replogle Globes, Inc. is located at 2801 South 25th Avenue in Broadview, Illinois. The source is a manufacturer of geographic globes. Three processes exist at the source; metal parts operation (including parts washing and coating), plastic injection molding, and wood line (including woodworking and coating). The metal parts operation consists of receiving sheet steel, bar metal, and pre-pressed metal bases which are then pressed, washed, painted, and oven cured before moving to the assembly and packing areas. The injection molding consists of a paper paint spray booth and a solvent globe joining operation, where the globe hemispheres are joined. The wood line works raw lumber into various size bases and parts, which are then coated. The source also operates three natural gas fired boilers (only one boiler is operational at any given time) to provide building heat.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 01	Group 1 Boilers: Natural Gas Fired Fuel Combustion Units	1958	None
Unit 02	Group 2 Coating Operations: See Sub-Groups		
	Sub-Group 2a Paper Coating Operations: 1 Dry Filter Paint Spray Booth	1985	Dry Filter
	Sub-Group 2b Metal Coating Operations: Electrostatic Paint Spray Booth with bake oven	1985	None
	Sub-Group 2c Wood Coating Operations: 7 Paint Spray Booths	1985	Dry Filters
Unit 03	Group 3 Joining Operation: Joining Globe Hemispheres with solvent	1985, 1990	None
Unit 04	Group 4 Woodworking Operations: Sanding, sawing, cutting, and grinding	1985	Dust Collector

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	38.00
Sulfur Dioxide (SO ₂)	0.02
Particulate Matter (PM)	1.12
Nitrogen Oxides (NO _x)	2.62
HAP, not included in VOM or PM	---
TOTAL	41.76

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

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