

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Clad-Rex, Inc.  
Attn: Peter Connor  
1150 West King Street  
Franklin Park, Illinois 60131

Application No.: 74120084

I.D. No.: 031096ABM

Applicant's Designation:

Date Received: August 8, 2000

Subject: Vinyl Metal Laminating

Date Issued: December 26, 2000

Expiration Date: December 26, 2005

Location: 11500 West King Street, Franklin Park

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a laminator and a back coater, both controlled by catalytic afterburner and an alkaline/phosphate cleaning line pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year of volatile organic materials (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. This permit is issued based upon the back coater being a subject to the VOM control requirements of 35 Ill. Adm. Code Subpart F: "Coating Operations" and the laminator being subject to the VOM control requirements of 35 Ill. Adm. Code Subpart PP: "Miscellaneous Fabricated Product Manufacturing Process". Compliance with these requirements is achieved due to usage of control device (catalytic afterburner) with overall efficiency exceeding 81%.
3. The operations and VOM emissions of the laminator and back coater shall not exceed the following limits:

	Raw Material	VOM	Control	
	Usage	Content	Efficiency	VOM Emissions
<u>Raw Material</u>	<u>(Gal/Mo) (Gal/Yr)</u>	<u>(Lb/Gal)</u>	<u>(%)</u>	<u>(Ton/Mo) (Ton/Yr)</u>

Adhesive	10,000	100,000	5.8	95	1.5	14.5
Thinner	3,000	27,000	7.4	95	0.6	5.0
Paint	200	1,000	7.5	95	0.04	0.2
Solvent	50	400	7.5	--	0.2	<u>1.5</u>
					Total	21.2

These limits define the potential emissions of the VOM and are based on the actual emissions determined from the maximum production capacity, the highest VOM content of raw materials and actual control efficiency of the afterburner which was demonstrated during the stack test. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

4. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- 5a. The afterburner shall be in operation at all times that the laminating line or back coater are in operation.
- b. The catalytic afterburner shall be equipped with a USEPA approved continuous monitor that will measure the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust. It shall be installed, calibrated, maintained and operated according to vendor specifications at all times the afterburner is in use.
6. This permit is issued based on negligible emission of particulate matter (PM) from the cleaning line. For this purpose, emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
7. The Permittee shall maintain monthly records of the following items:
  - a. Names and amounts of adhesives and thinners used in the laminator (gal/mo);
  - b. Name and amount of paint used in the back coater (gal/mo);
  - c. Names and amounts of solvents used for cleanup (gal/mo);
  - d. VOM and HAP content of materials used in items a. - c. (lb/gal); and
  - e. VOM and HAP emissions (lb/month and tons/year).
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in a computer shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond them to an

Illinois EPA request for records during the course of a source inspection.

9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: coatings and solvents usage.

It should be noted that the boilers and dryers are exempt from state permit requirements pursuant to 35 Ill. Adm. Code 201.146(d) and (fff), respectively.

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

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

DES:VJB:jar

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

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from metal laminating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is usage of 100,000 gallons of adhesive, 27,000 gallons of adhesive thinner, 1,000 gallons of paint, 400 gallons of clean-up solvents per year and continuous operation of the catalytic afterburner with minimum efficiency of 95%. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP and 25 tons per year for totaled HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

- The operations and VOM emissions of the laminator and back coater shall not exceed the following limits:

<u>Raw Material</u>	<u>Raw Material Usage</u>		<u>VOM Content</u>	<u>Control Efficiency</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Gal)</u>	<u>(%)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Adhesive	10,000	100,000	5.8	95	1.5	14.5
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