

217/782-2113

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

PERMITTEE

Pactiv Corporation
Attn: Larry Lahm
437 Center Road
Frankfort, Illinois 60423-1690

<u>Application No.:</u> 95120083	<u>I.D. No.:</u> 197040AAB
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 7, 1995
<u>Operation of:</u> Polystyrene Foam Packaging	
<u>Date Issued:</u> June 21, 1999	<u>Expiration Date</u> ² : June 21, 2004
<u>Source Location:</u> 437 Center Road, Frankfort	
<u>Responsible Official:</u> Reggie Goldsmith, Plant Manager	

This permit is hereby granted to the above-designated Permittee to operate a foam packaging manufacturing plant, 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 Dan Punzak at 217/782-2113.

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

DES:DGP:psj

cc: Illinois EPA, FOS, Region 1
USEPA

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

Pactiv Corporation
437 Center Road
Frankfort, Illinois 60423
815/469-2112 Extension 327

I.D. No.: 197040AAB
Standard Industrial Classification: 3086, Plastic Foam Products

1.2 Owner/Parent Company

Pactiv Corporation
1900 West Field Court
Lake Forest, Illinois 60045

1.3 Operator

Pactiv Corporation
437 Center Road
Frankfort, Illinois 60423

Larry Lahm, Environmental/Safety Manager
815/469-2112 Extension 327

1.4 General Source Description

The Pactiv Corporation is located at 437 Center Road in Frankfort, Will County. The source manufactures polystyrene foam packaging for the consumer market, including meat trays, fast food packages, school lunch trays and disposable tableware.

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
ATUs	Allotment Trading Units
BAT	Best Available Technology
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
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
kW	kilowatts
lb	pound
MACT	Maximum Available Control Technology
mmBtu	Million British thermal units
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
PTE	Permanent Total Enclosure
RTO	Regenerative Thermal Oxidizer
SO ₂	Sulfur Dioxide
T1	Title I - Identifies Title I conditions that have been carried over from an existing construction permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
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:

Combustion Units

Building 3

CU 009, Heater 01 East, Comfort HVAC No. 1 (4.0 mmBtu/hr)
CU 010, Heater 02 West, comfort HVAC No. 2 (4.0 mmBtu/hr)

Building 4A

CU015, Space Heater 05 (3.2 mmBtu/hr)
CU016, Space Heater 06 (3.2 mmBtu/hr)

Building 12

CU 023, Space Heater A (2.9 mmBtu/hr)
CU 024, Space Heater B (2.9 mmBtu/hr)
CU 025, Space Heater C (2.9 mmBtu/hr)
CU 038, Warehouse Air Handler No. 1 (2.9 mmBtu/hr)
CU 039, Warehouse Air Handler No. 2 (2.9 mmBtu/hr)
CU 040, Warehouse Air Handler No. 3 (2.9 mmBtu/hr)
CU 041, Warehouse Air Handler No. 4 (2.9 mmBtu/hr)
CU-042, Warehouse Air Handler No. 5 (2.9 mmBtu/hr)

- 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:

Product Bagging

BM 001, Manual Bag Sealing (145F) No. 1
BM 002, Manual Bag Sealing (145F) No. 2
BM 003, Manual Bag Sealing (145F) No. 3
BM 004, Manual Bag Sealing (145F) No. 4
BM 005, Manual Bag Sealing (145F) No. 5
BM 006, Manual Bag Sealing (145F) No. 6
BM 101, Automatic Bag Sealing Machine (330F) No. 500
BM 102, Automatic Bag Sealing Machine (330F) No. 501
BM 103, Automatic Bag Sealing Machine (330F) No. 502
BM 104, Automatic Bag Sealing Machine (330F) No. 503
BM 105, Automatic Bag Sealing Machine (330F) No. 504
BM 106, Automatic Bag Sealing Machine (330F) No. 505
BP 01, Product Bag Labeler
BP 02, Product Bag Labeler

BP 03, Product Bag Labeler
BP 04, Product Bag Labeler
BP 05, Product Bag Labeler
BP 06, Product Bag Labeler
BP 07, Product Bag Labeler

Miscellaneous

MS 007, Berringer Jet Cleaner
MS 008, Building 1 Paint Booth
MS 009, Talc Storage Area
MS 012, Solvent Parts Cleaner No. 1, Building 1
MS 013, Solvent Parts Cleaner No. 2, Building 12
MS 014, Solvent Parts Cleaner No. 3, Portable
MS 015, Cutting Oil Use
MS 018, Oil/Water Separator
MS 019, Bulk Chemical & Oil Storage Shed
MS 021, Petroleum Naphtha Die Cleaner

- 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; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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).

4.0 SIGNIFICANT EMISSION PROCESSES AT THIS SOURCE

Emission Process	Description	Date Constructed	Emission Control Equipment
01	Material Handling Processes. Emission units which are part of these processes include each: - Virgin Resin Silo - Recycle Resin Silo - Resin Use Bin - Resin Blender	a	Filters
02	Reclaim Processes. Emission units which are part of these processes include each: - Chopper - Grinder - Granulator - Fluff Silo - Reclaim Extruder	b	Regenerative Thermal Oxidizer
03	Other VOM Emitting Processes. Emission units which are part of other VOM emitting processes include each: - Extruder - Roll Storage Area - Thermoformer - Warehouse	b	None
04	BA 001 and 002 Blowing Agent Storage Tanks	1989	Vapor Balance Line

^a Although some equipment was installed prior to 1972, the Permittee accepts PM emitting equipment as subject to the rule for "new" units, i.e., constructed after April 14, 1972.

^b Recent construction permit involved netting of VOM for entire source, so actual dates of construction not relevant to any rules. Not subject to any NSPS or NESHAP. Netting calculations from Construction Permit 97030034 are in Attachment 2.

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.
- 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 This stationary source, as defined in 40 CFR Section 68.3, is subject to Part 68, the Accidental Release Prevention regulations. This stationary source shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10. This stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.
- 5.2.5 Some emission units classified as insignificant activities in Section 3.0 remain subject to certain requirements of 35 IAC 218 as there are no de minimis levels which exempt them from the requirements.
- a. Three solvent parts cleaners and petroleum xaphtha die cleaner identified in Section 3.1.2.
 - i. Operating Procedures: No person shall operate a cold cleaning degreaser unless:
 - A. Waste solvent is stored in covered containers only and not disposed of in such manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - B. The cover of the degreaser is closed when parts are not being handled; and
 - C. Parts are drained until dripping ceases. [35 IAC 218.182(a)]
 - ii. Equipment Requirements: No person shall operate a cold cleaning degreaser unless:
 - A. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powdered system if:
 - 1. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);
 - 2. The solvent is agitated; or

3. The solvent is heated above ambient room temperature.
- B. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
1. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
 2. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
- C. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point:
1. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
 2. Any other equipment or system of equivalent emission control as approved by the Agency and further processed consistent with Section 218.108 of this Part. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- D. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- E. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray. [35 IAC 218.182(b)]
- b. Oil/water separator identified in Section 3.1.2.

No person shall use any single or multiple compartment effluent water separator which receives effluent water containing 757 l/day (200 gal/day) or more of organic material from any equipment

processing, refining, treating, storing or handling organic material unless such effluent water separator is equipped with air pollution control equipment capable of reducing by 85 percent or more the uncontrolled organic material emitted to the atmosphere. Exception: If no odor nuisance exists the limitations of this subsection shall not apply if the vapor pressure of the organic material is below 17.24 kPa (2.5 psia) at 294.3°K (70°F).

5.3 Non-Applicability of Regulations of Concern

- a.
 - i. The emission units at the source are not subject to any subparts of 35 IAC Part 218 which were final as of the effective date of this permit other than Subparts A, B, G, Subpart TT (as described below), and Subpart UU as addressed elsewhere in this permit.
 - ii. This permit is issued based on the emission units at the source not being subject to 35 IAC Part 218, Subpart TT, except as explained below:

35 IAC 218.980(f) lists exemptions from the control requirements in Subpart TT. Among the listings are polystyrene foam packaging: ". . . not including storage and extrusion of scrap where the blowing agent is added to the polystyrene at the source". This is the type of process performed by the Permittee and thus most emission points are exempt from control requirements except for the storage and extrusion of scrap.

- b. The emission units at the source are not subject to New Source performance Standards in 40 CFR Part 60 which were final as of the effective date of this permit.
- c. The emission units at the source are not subject to any National Emission Standards for Hazardous Pollutants in 40 CFR Part 61 which were final as of the effective date of this permit.
- d. The emission units at the source are not subject to any National Emission Standards for Hazardous Pollutants for Source Pollutants (Maximum Achievable Control Technology) in 40 CFR Part 63 which were final as of the effective date of this permit.

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)	391.9
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM) ^a	16.1
Nitrogen Oxides (NO _x) ^b	9.8
HAP, not included in VOM or PM	----
TOTAL	417.8

^a Includes fugitive emissions.

^b The NO_x emissions are generated by the pollution control device (a regenerative thermal oxidizer) and not by fuel combustion devices (e.g., boilers).

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs. The potential to emit is below these applicability levels at maximum operating rate and therefore no special recordkeeping is required for verification.

5.5.3 Other Source-Wide Emission Limitations

a. Condition 5.5.1 states that the permitted emissions for fees is not federally enforceable. While for fees it is true, that same limit (391.9 tons/yr) for VOM is a condition of Construction Permit 97030034 and is federally enforceable pursuant to 35 IAC Part 203.

Compliance with the annual limit shall be determined from a running total of 12 months of emission data, but the Permittee may choose to comply with a running total of a year of weekly data.

- b. In addition to the annual limit for VOM, that same construction permit also included a limit of 120.0 tons from May 1 to September 30 of each year (the "ozone season" for the purpose of Section 6 of this permit). Compliance with the ozone season limit shall be determined from a running total of weekly data, including the previous year's ozone season data.
- c. The VOM used as a blowing agent shall not be a HAP.
- d. Operational and recordkeeping requirements to assure compliance with the above limits are in Conditions 5.6 and 7.1.

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 HAP Emissions.

Since emissions of HAPs should be under 3 tons/year, no special recordkeeping is required. The HAPs emitted are trace amounts in the raw materials. If a change is made to a different blowing agent that is a HAP, the Illinois EPA must be notified prior to the change. This is unlikely since the product is used in the food service business.

5.6.3 Records for Operating Scenarios

N/A

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.

- a. Compliance with the seasonal emission limitation of Condition 7.1.6(a).
- b. Compliance with the annual emission limitation of Condition 7.1.6(b).

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, 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).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating HAP and NO_x 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 emission factors in Table 9-2 of the application may be used.
- b. Although the RTO is not a fuel combustion device, the AP-42 emission factor for combustion of natural gas may be used, i.e., 0.1 lb NO_x per million Btu.

5.9.2 Compliance with Sulfur Dioxide Limit

Compliance with the SO₂ limit of Condition 5.2.2(c) is assumed based on the use of raw materials which do not contain sulfur in measurable amounts.

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. Once the ERMS begins, 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 permits. 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). Sources may also transfer or sell the ATUs that they holds to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in

an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.

- i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a

qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.650, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by

35 IAC 205.650(a), and shall be submitted in accordance with the following:

- i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
- ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.650, the report shall reference the associated emergency conditions report that has been approved by the Agency;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a. Although the source is a participating source, an allotment of ATUs was not established for the source when the CAAPP permit was issued. This is because the source has been modified such that the required data was not available upon which to make an appropriate allotment. Instead, a contingent allotment is established, as addressed below.
- b. Contingent Allotments
 - i. After three seasons of operation of the new equipment addressed by Construction Permit 97030034, an allotment will be issued. The new allotment will not exceed 1,200 ATUs, the equivalent of 120 tons per season, the seasonal emissions of VOM allowed by Construction Permit 97030034.

In accordance with 35 IAC 205.310(h) and 205.320(f), the source shall submit a written request for, or an application for, a revised emissions baseline and allotment which address these emission units by December 1 of the year of the third complete seasonal allotment period in which each such newly constructed or modified emission unit is operational. Such submittal shall include information from the affected emission units on the seasonal emissions for these first three seasonal allotment periods.
 - ii. The minimum allotment of ATUs to this source is 1,121 ATUs per seasonal allotment period. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions, prior to modification were 114.2 tons. The allotment then reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, such as units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iii. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
- c. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

- d. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.530;
 - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.620; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.600(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and

- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

None

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

Everything Excluding Reclaim

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Foam Packaging Manufacturing Processes Control Filters and Thermal Oxidizer

7.1.1 Description

The manufacture of polystyrene foam packaging involves mixing of a blowing agent with polystyrene under high pressure and when the pressure is released while passing through a die the product expands or "foams" into thin rolls. Tenneco adds the blowing agent to the polystyrene on site.

Tenneco's blowing agent is usually a blend of a VOM and non-VOM material although the non-VOM is not required to be used as long as the emission limit for VOM is met. The non-VOM simply allows Tenneco to make more product for the same amount of emissions. The non-VOM used by Tenneco is not a regulated pollutant.

The foam rolls are then aged and after aging the rolls are fed into thermoformers to form trays or plates.

The trim waste from the thermoformers and whole rolls or product that do not meet quality specifications are reground, granulated and reused. The VOM that escapes from the regrind process is captured and vented to a regenerative thermal oxidizer (RTO), the only emission point with a VOM control device. PM control devices are used on the handling of polystyrene resin and reground fluff. An RTO is a specific type of afterburner

The product continues to release blowing agent while in the warehouse awaiting shipment.

Tenneco determines emissions from a plantwide material balance rather than specific emission points. That is the VOM into the process is measured, the amount in the product is known from previous testing, and the amount destroyed and not destroyed by the thermal oxidizer are all known and what cannot be accounted for is assumed to be emitted.

Tenneco purchases the virgin polystyrene resin that is used in the process. None is manufactured on site.

7.1.2 List of Significant Emission Processes and Pollution Control Equipment

Emission Process	Description	Emission Control Equipment
01	Material Handling Processes. Emission units which are part of these processes include each: - Virgin Resin Silo - Recycle Resin Silo - Resin Use Bin - Resin Blender	Filters
02	Reclaim Processes. Emission units which are part of these processes include each: - Chopper - Grinder - Granulator - Fluff Silo - Reclaim Extruder	Regenerative Thermal Oxidizer
03	Other VOM Emitting Processes. Emission units which are part of other VOM emitting processes include each: - Extruder - Roll Storage Area - Thermoformer - Warehouse	None
04	BA 001 and 002 Blowing Agent Storage Tanks	Vapor Balance Line

7.1.3 Applicability Provisions and Applicable Regulations

- a.
 - i. An "affected material handling process" for the purpose of these unit-specific conditions is a typical process as described in Emission Unit 01 in Condition 7.1.2.
 - ii. Each material handling process is subject to 35 IAC 212.321 which states that, "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 which, 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, exceed the allowable emission rates specified by using the equation:

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

Where:

P = Process weight rate; and
 E = Allowable emission rate; and

1. Up to process weight rates of 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

- iii. Emission units 02 and 03 are also subject to the same rule but are not considered PM emitting processes.
- b.
 - i. An "affected reclaim process" for the purpose of these unit-specific conditions is a process that chops, grinds or granulates product unfit for sale or trim waste and then extrudes the recovered polystyrene into pellets for reuse. The various pieces of equipment are described in Unit 02 in Condition 7.1.2.
 - ii. This reclaim or scrap process is subject to 35 IAC 218.986(a) which describes the control requirements as:

Emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit, or (Board Note: For the purpose of this provision, an emission unit is any part or activity at a source of a type that by itself is subject to control requirements in other Subparts of this Part or 40 CFR 60, incorporated by reference in Section 218.122, e.g., a coating line, a printing line, a process unit, a wastewater system, or other equipment, or is otherwise any part or activity at a source).
 - iii. 35 IAC 218.107 allows that the operation of any natural gas fired afterburner and capture system used to comply with Part 218 is not

required during the period of November 1 of any year to April 1 of the following year provided that the operation of such devices is not required for purposes of occupational safety or health, or for the control of toxic substances, odor nuisances, or other regulated pollutants.

The control requirements and emission limitations in Condition 7.1.5 and 7.1.6 require a much higher level of control than the requirements of 7.1.3(b)(ii) and also effectively require that the afterburner operate a substantial portion of the time between November 1 of any year and April 1 of the following year, thus partially negating 35 IAC 218.107.

- c. An "affected other VOM emitting process" for the purpose of these unit-specific conditions is a process as described in Emission Process 03 in Condition 7.1.2.

These processes are regulated by 35 IAC 218 Subpart TT but are exempted from the control requirements of 35 IAC 218.986(a) as described in 35 IAC 218.980(f).

- d. An "affected blowing agent storage tank" for the purpose of these unit-specific conditions, is a tank as described in Condition 7.1.2.

These tanks could qualify as insignificant emission units but because they are part of the material balance for determining emissions of VOM they have been included. That is, the material balance begins with VOM delivered to the tanks, not VOM delivered from the tanks.

- e. Each affected emission process is subject to the emission limits identified in Condition 5.2.2.

- f. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of a regenerative thermal oxidizer (RTO, including capture system and monitoring system), the Permittee is authorized to continue operation of the entire process in violation of the applicable requirement of 35 IAC 218.986(a), as necessary to prevent risk of injury to personnel or severe damage to equipment. This authorization is subject to the following requirements:

- i. The Permittee shall repair the damaged

feature(s) of the RTO or shutdown the entire process within 24 hours unless the feature(s) has been repaired within 24 hours. This requirement only applies for the period of April 1 to October 31 of each year as 35 IAC 218.107 allows seasonal shutdown of the afterburner.

Continued operation during malfunction or breakdown of the RTO from November 1 of any year until April 1 of the following year is allowed provided that the annual VOM emission limitation in Condition 7.1.6 is met.

- ii. From April 1 to November 1, within 4 hours of malfunction or breakdown the Permittee shall shutdown units that are vented to the RTO that can be reasonably shut down, in order to minimize emissions. For example, rejected full rolls need not be fed to the reclaim granulator as they can be stored, but trim waste must be granulated due to storage problems.
 - iii. The Permittee shall maintain an adequate inventory on site of spare parts for the RTO/capture system.
 - iv. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.1.9(b) and 7.1.10(a).
- g. Startup Provisions

- i. If the operation has been shutdown for over 36 hours and the RTO is "cold" then the RTO must be preheated to normal combustion temperature before the processes vented to the RTO begin operation.

However, if there is an electrical or similar failure, and the combustion temperature of the RTO is less than 400EF below normal operating temperature, the reclaim process may begin as soon as electric power is restored. However, reclaiming of rolls that may be delayed shall not begin until normal temperature is achieved.

- ii. During periods when the RTO is not required to be operated as a control device, and not to exceed once per calendar year, as part of startup activity for RTO, the Permittee may perform a "burnout" of the RTO. During a

burnout each of the ceramic beds is heated to higher than normal temperature to clean the ceramic beds. During this burnout, opacity from the RTO may exceed the limit in Condition 5.2.2(b). The burnout period shall not exceed 24 hours.

- iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.1.9(d).

7.1.4 Non-Applicability of Regulations of Concern

None of the processes described in Condition 7.1.2 is subject to the control requirements of 35 IAC 218.301 because the organic material used in the process (the blowing agent) is not photochemically reactive organic material as defined in 35 IAC 211.4690.

Although the storage tanks were constructed after the applicability date of the New Source Performance Standards, 40 CFR 60 Subpart Kb, the tanks are designed to operate in excess of 204.9 kPa (29.7 psia) and without emissions to the atmosphere so that the tanks are not subject to the NSPS, pursuant to Section 60.110b(d)(2).

35 IAC 218.122(b) requires that tanks larger than 250 gallons and containing a volatile organic liquid with a vapor pressure greater than 2.5 psia be equipped with a permanent submerged loading pipe or equivalent control device. A pressurized tank with a vapor balance line is considered an equivalent control device.

7.1.5 Control Requirements and Work Practices

- a. The reclaim capture system (reclaim extruder vents, in-line grinders [choppers], and granulators) shall be operated to ensure 100% capture whenever the afterburner is operating, that is, all the emissions captured from reclaim operations shall vent to the inlet of the RTO.
- b. The RTO, when operated, shall be operated to reduce captured volatile organic material (VOM) emissions by at least 98.8%.
- c. To reasonably assure compliance with Condition 7.1.5(b), the temperature of the RTO combustion chamber shall not fall below the temperature at which compliance was demonstrated in the most recent compliance tests, except that this minimum temperature does not apply during compliance testing, itself. This minimum temperature is 1,310EF as of the issuance of this permit. If the Permittee

conducts future compliance tests and IEPA accepts the compliance tests, the minimum operating temperature of the afterburner will be the lowest temperature achieving the required destruction efficiency whether the temperature is higher or lower than, 1,310EF. This temperature will be the new minimum operating temperature.

- d. The RTO shall be in operation at all times from April 1 to October 31 of each year when the associated emission unit(s) are in operation and emitting VOM except as allowed by Condition 7.1.3(f), and the number of days necessary from November 1 of one year to March 31, of the following year to meet the limits in Condition 7.1.6(a)
- e. The Permittee shall follow good operating practices for the RTO, including periodic inspection, routine maintenance and prompt repair of defects.
- f. The materials used as blowing agents shall not be HAPs.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the VOM emissions from affected Units 01-04 are subject to the following [T1]:

- a. For the period from May 1 to September 30 of each year: 120.0 tons as calculated by the Permittee's emissions calculation protocol. Compliance with this "ozone season" limit shall be determined from a running total of weekly data, including the previous year's data, e.g., on May 29 compliance shall be determined from the total of May 29 through September 30 of the previous year (weeks 5-22) plus May 1 through May 28 of the current year (weeks 1-4).
- b. For the annual total: 391.7 tons as calculated by the Permittee's emissions calculation protocol. Compliance with this annual limit shall be determined from a running total of 12 months of data, but the Permittee may choose to comply with a running total of a year of weekly data.

The above limitations were established in Construction Permit 97030034, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203.

7.1.7 Testing Requirements

- a. The equipment that was approved for construction in Permit 97030034 shall be tested in accordance with the conditions of Construction Permit 97030034 (Condition 8). This condition requires that the test take place within 60 days of startup of all new equipment and employ the following methods:

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Volatile Organic Material	USEPA Method 25, 25A if outlet VOM cont. < 50 ppmv as C Non CH ₄

- b. Upon request by the Illinois EPA, the Permittee shall verify capture efficiency of the reclaim system, the destruction efficiency of the RTO, or residual amounts of VOM blowing agent remaining in the product.

- i. Control device efficiency shall be determined by the test methods described in 35 IAC 218.105(c) through (f) unless specific changes are approved by the Illinois EPA.
- ii. Capture efficiency on the in-line grinders portion of the reclaim system may be demonstrated to be 100% by operation in a manner consistent with that at Tenneco's Covington, Georgia plant, at which capture efficiency has been evaluated by the Georgia Environmental Protection Department, rather than by testing. Capture efficiency for the extruder vents and granulators shall be demonstrated to be 100% in accordance with 35 Ill. Adm. Code 218 Appendix B Procedure T (USEPA Method 204).
- iii. Residual amounts of VOM blowing agent in the product shall be demonstrated by employing standard or approved testing methods.

As of the date issued of this permit the approved test procedures are the methods the Permittee is currently employing from their operations manual. One method is called a sampling procedure as described in Appendix B of the manual. The other method is the actual determination of VOM content by mass balance, i.e. evaporation of the residual VOM, as described in Appendix C of the manual.

Deviation from these methods will require notification of the Illinois EPA.

7.1.8 Monitoring Requirements

The RTO shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the RTO is in use. This device shall monitor the RTO combustion chamber temperature. [35 IAC 218.105(d)(2)(A)(i)]

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for affected emission Unit 02 to 03 in order to demonstrate compliance with Conditions 5.5.1, 7.1.3(b), 7.1.5, 7.1.6 and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

- a. Capture and control system operational data [35 IAC 218.991(a)(2)]:
 - i. A log of operating time for the capture system, control device, monitoring equipment, and the associated emission units. These logs shall be sufficient to reasonably identify periods of time when: an emission unit(s) served by the control device operate but the capture system is not operational; emission unit(s) served by the control device operate but the control device is not operating; and the control device is operating but its monitoring equipment is not operating.
 - ii. Thermal oxidizer combustion chamber temperature (continuous).
 - iii. A maintenance log for the capture system, thermal oxidizer, and thermal oxidizer temperature monitor detailing all routine and non-routine dates and duration of any outages.
 - iv. Capture and control system efficiency testing data:
 - A. The date, place and time of sampling or measurements;
 - B. The date(s) analyses were performed;
 - C. The company or entity that performed the analyses;

- D. The analytical techniques or methods used;
- E. The results of such analyses; and
- F. The operating conditions as existing at the time of sampling or measurement.

v. Records for Startup

The following records, pursuant to Section 39.5(7)(b) of the Act, for each affected RTO control system subject to Condition 7.1.3(g), which at a minimum shall include the following information for each burnout of RTO control system:

Date and duration of RTO burnout

vi. Records for Malfunctions and Breakdowns of RTO Control System

Records, pursuant to 35 IAC 201.263, of continued operation of a reclaim system subject to 35 IAC 218.986(a) or Condition 7.1.6 during malfunctions and breakdown of the control features of the RTO control system from April 1 to October 31 of each year, which as a minimum, shall include:

- A. Date and duration of malfunction or breakdown;
- B. A detailed explanation of the malfunction or breakdown if normal temperature is not achieved in one hour. If the malfunction was caused by electrical failure, the Permittee shall explain if it had the ability to prevent future occurrences. If prevention is possible, steps taken for prevention;
- C. An explanation why the damaged feature(s) could not be immediately repaired or the reclaim system removed from service without risk of injury to personnel or severe damage to equipment;
- D. The measures used to reduce the quantity of emissions and the duration of the event such as those discussed in Condition 7.1.3(g);

- E. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and
- F. The amount of release above typical emissions during malfunction/breakdown.

Note: VOM emissions due to RTO malfunction or breakdown from November 1 of any year to April 1 of the following year must be estimated and included in determining compliance with the VOM emissions limitation in Condition 7.1.6(b).

VOM emissions due to RTO malfunction or breakdown from May 1 through September 30 must be recorded and included in determining compliance with the limitation in Condition 7.1.6(a).

However, as also explained in Section 6, VOM emissions due to RTO malfunction or breakdown from May 1 through September 30 as authorized by Condition 7.1.3(f) do not have to be included as part of the ERMS calculations for compliance accounting purposes.

b. Records for VOM and HAP Emissions

Specific records to determine VOM emissions.

Note: Although there are specific emission points within the process, Condition 7.1.6 limits VOM emissions of the entire process and records to verify compliance with this limitation are kept for the entire process based primarily on a material balance using emission control efficiency (capture and destruction) determined by emission testing for reclaim/recycle, which is vented to regenerative thermal oxidizer (RTO) to control VOM emissions. The levels of residual amounts of blowing agent in intermediate or final product have previously been determined. The value may vary depending upon the specific product and time in storage.

- i. Primary information or measured values for each time period. These records are

at least weekly during the ozone seasonal allotment period (May B September) and at least monthly, but may be weekly for the remainder of the year.

- A. VOM blowing agents received.
- B. Inventory of VOM blowing agents (ending inventory of one time period is beginning of inventory of next period).
- C. Extrusion throughput.
- D. Finished goods produced.
- E. Reclaim processed
 - 1. With RTO operating.
 - 2. With RTO not operating.
- F. Residence time of product in warehouse.
- G. Natural gas usage in RTO.

ii. Predetermined Values

Values to be used in making emission calculation that have been determined by previous testing, unless later testing establishes new values. These values are required by Condition 7.1.5(a) and (b).

- A. Capture efficiency for VOM generated by reclaim fluff/grinding and reclaim extruder that is sent to RTO: 100%
- B. RTO destruction efficiency: 98.8%

iii. Calculated data for each time period.

- A. VOM blowing agent usage.
- B. VOM retained in finished goods.
- C. VOM released in production.
- D. VOM released in reclaim fluff/grinding.
- E. VOM released in reclaim extruders.
- F. VOM from reclaim system RTO.

- G. VOM from reclaim system when RTO not operating.
 - H. Extrusion emissions.
 - I. Thermoforming emissions.
 - J. Roll storage aging emissions.
 - K. Total VOM emissions.
 - L. HAP emissions.
- iv. Total emissions data.
 - A. Annual VOM emissions on a monthly basis.
 - B. Annual HAP emission on a monthly basis.
 - C. VOM emissions during the seasonal allotment period (by November 30 of each year)

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected foam manufacturing process 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. Continued operation of the process during malfunction breakdown of the RTO system from April 1 to October 31 in excess of the time periods allowed by Condition 7.1.3(f).
- b. Failure to follow hot startup procedures of Condition 7.1.3(g).
- c. Reporting of Malfunctions and Breakdowns for Reclaim System

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of a reclaim system subject to Condition 7.1.3(f) during malfunction or breakdown of the control features of the reclaim system RTO.

- i. The Permittee shall notify the Illinois EPA=s

regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction, or breakdown.

ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the reclaim system was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when the reclaim system was taken out of service.

iii. If compliance is not achieved within one working day of the occurrence as required by Condition 7.1.3(f), the Permittee shall submit interim status reports to the Illinois EPA, Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the reclaim system will be taken out of service.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to foams process 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:

- a. Use of any non-VOM blowing agent that is not a HAP.
- b. Use of alternate VOM blowing agents provided that the emission limits in Condition 7.1.6 are met and the new agent is not a HAP.

7.1.12 Compliance Procedures

- a. Compliance with the emission limits and control

requirements shall be based on the recordkeeping requirements in Condition 5.6.3 and 7.1.9 and the use of a material balance as described in the application and the following formula:

$$\text{VOM (lb)} = \text{VOM from extruders (lb)} + \text{VOM from thermoforming (lb)} + \text{VOM from roll storage (lb)} + \text{VOM from warehouse (lb)} + [\text{VOM from reclaim system (lb)}] \times [\text{Factor}]$$

- b. When RTO is off, Factor = 1. When RTO is on, Factor = $1 - \frac{\text{capture efficiency (\%)} + \text{oxidizer destruction efficiency (\%)}}{100}$.

Compliance with rule limitations for material handling processes is assumed if the filters are operated properly.

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 January 10, 1999 (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
 - 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 (AR - 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.

9.2 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. This provision does not extend to the temporary transfer of a unit from the permitted location for the purpose of repair or renovation.

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: _____

DGP:psj

10.2 Attachment 2: Summary of VOM Emissions Increase and Decrease in Construction Permit 97030034.

	Seasonal ^a (Tons)	Annual (Tons)
Baseline 1995-1996	98.0	369.7
Project Increases from Addition of New Equipment	27.1	86.1
Project Decreases ^b	- 15.3	- 107.4
Total Project Emissions	11.8	- 21.3
Allowed Emission Increase at Existing Equipment	<u>10.2</u>	<u>43.3</u>
Permitted Net Increase	22.0	22.0
Expected Actual Increase	18.2	19.0 ^c

^a May 1 - September 30

^b Seasonal decreases due to improved capture efficiency on reclaim system. Annual decrease due to use of afterburner part of the time from November 1 of one year to March 30 of the following year.

^c Since the number of days the afterburner operates can be adjusted, this is likely to be near permitted level, with some safety factor to avoid noncompliance.

DGP:psj