

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Bernhard Woodwork Ltd.  
Attn: Frank Schott  
3670 Woodhead Drive  
Northbrook, Illinois 60062

<u>Application No.:</u> 83070012	<u>I.D. No.:</u> 031207ACW
<u>Applicant's Designation:</u> COATINGS	<u>Date Received:</u> July 7, 2000
<u>Subject:</u> Wood Furniture Manufacturing	
<u>Date Issued:</u> December 26, 2000	<u>Expiration Date:</u> December 26, 2005
<u>Location:</u> 3670 Woodhead Drive, Northbrook	

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three wood furniture coating booths 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 permit(s) issued for this location.
2. This permit is issued based upon the paint lines not being subject to the VOM emission limitations of 35 Ill. Adm. Code Part 218, Subpart F: Coating Operations. This is a consequence of the federally enforceable limitations of this permit which limits VOM emissions from wood furniture coating operations below applicability threshold of 25 tons/year established by Section 218.208(b).
- 3a. Total combined emissions of VOM from painting and clean-up operations shall not exceed 4.0 tons/month and 20.0 tons/year.
- b. 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 Agency. 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 Agency.

- c. The VOM and HAP emissions shall be determined from the following equation:

$$E = \sum (P_i \times C_i) + \sum (S_j \times C_j)$$

Where:

E - VOM (HAP) emissions (lb);  
P<sub>i</sub> - Paint usage (gal);  
C<sub>i</sub> - VOM (HAP) content of the paint (lb/gal);  
S<sub>j</sub> - Clean-up solvent usage (gal);  
C<sub>j</sub> - VOM (HAP) content of the solvent (lb/gal).

- d. These limits define the potential emissions of the VOM and HAPs and are based on the actual emissions determined from the maximum production capacity. Compliance with annual limits shall be determined from a running total of 12 months of data.
4. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
5. The Permittee shall maintain monthly records of the following items:
- a. The name and identification number of each coating and cleanup solvent as applied.
  - b. The VOM and HAP content of each coating and cleanup solvent (lb/gal).
  - c. Coating usage (gal/month and gal/year).
  - d. Cleanup and thinner solvent usage (gal/month and gal/year).
  - e. VOM and HAP emissions (lb/month and tons/year).
6. 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 Agency 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 Agency request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Agency's Compliance and System Management Section in Springfield, Illinois within 30 days after the exceedance. The

report shall include the emissions released in accordance with the record keeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

8. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
  - a. Coatings and solvent usage (gal/year).
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

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

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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 wood furniture manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below 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.

- 1a. Total combined emissions of VOM from painting and clean-up operations shall not exceed 2.0 tons/month and 20.0 tons/year.
  
- b. 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 Agency. 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 Agency.
  
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C<sub>j</sub> - VOM (HAP) content of the solvent (lb/gal).

2. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.

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