

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Mikron Industries
d/b/a: Mikron Midwest
Attn: Todd Thompson - Purchasing Manager
501 North Elida Street
Winnebago, Illinois 61088

Application No.: 11030016

I.D. No.: 201050AAL

Applicant's Designation:

Date Received: March 9, 2011

Subject: Wood Veneer Line

Date Issued: August 19, 2011

Location: 501 North Elida Street, Winnebago, Winnebago County

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of one (1) wood veneer line (EU-11) as pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on the emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the above-listed equipment being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from the above-listed equipment not triggering the requirements of Section 112(g) of the Clean Air Act.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. A construction permit covers construction activity taking place on or after the date of issuance of the permit. Even though the issuance of this permit indicates that the Illinois EPA has found that the application for the subject equipment met 35 Ill. Adm. Code 201.155, the standards for issuance of a construction permit, this permit does not cover and in no way condones or approves any construction of the subject emission sources or air pollution control equipment which took place before the date of issuance of this permit.
- 2a. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.
- 3a. This permit is issued based on the cleanup associated with the Wood Veneer Line (EU-11) not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent

Cleaning, 40 CFR 63 Subpart T. Pursuant to 40 CFR 63.460(a), wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of 40 CFR 63 Subpart T.

- b. This permit is issued based on the Wood Veneer Line (EU-11) not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ because the source is not engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components. Pursuant to 40 CFR 63.801, wood furniture means any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particleboard that is manufactured under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.
 - c. This permit is issued based on the Wood Veneer Line (EU-11) not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD because the source is not a major source of HAP emissions. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs established in permit 03030093.
 - d. This permit is issued based on the Wood Veneer Line (EU-11) not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products, 40 CFR 63 Subpart QQQQ because the source is not a major source of HAP emissions. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs established in permit 03030093.
 - e. This permit is issued based on the Wood Veneer Line (EU-11) not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Wood Preserving Area Source, 40 CFR 63 Subpart QQQQQQ because the source is not a wood preserving operation. Pursuant to 40 CFR 63.11433, wood preserving means the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers.
4. Pursuant to 35 Ill. Adm. Code 215.181(a), the requirements of 35 Ill. Adm. Code 215.182 through 215.184 for solvent cleaning in general shall not apply to sources whose emissions of volatile organic material do not exceed 6.8 kg (15 lbs) in any one day, nor 1.4 kg (3 lbs) in any one hour.
 5. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to

minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

6a. Emission and operation of the Wood Veneer Line (EU-11) shall not exceed the following limits:

i. Material usage:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Content</u>
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Weight %)</u>
Methylene Chloride	216	1,730	0

ii. Emissions limits:

<u>Material</u>	<u>Pollutant</u>	<u>Emissions</u>	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Methylene Chloride	HAP	1.12	9.50

These limits are based on the maximum emissions determined from a mass balance at the maximum material usage rate. These limits ensure that the emissions of HAPs from the Wood Veneer Line (EU-11) do not trigger the requirements of Section 112(g) of the Clean Air Act, 40 CFR 63 Subpart DDDD, and/or 40 CFR 63 Subpart QQQQ.

b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA

guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 8a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Usage of each material associated with the Wood Veneer Line (EU-11) operation (gallons/month and gallons/year);
 - ii. VOM and HAP content of each material used (% by weight); and
 - iii. Monthly and annual emissions of VOM and HAP from the Wood Veneer Line (EU-11) with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 9a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications 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
5407 North University
Peoria, Illinois 61614

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

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:GB:jws

cc: Illinois EPA, FOS Region 2
Lotus Notes