

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE -- REVISED

PERMITTEE

E. A. Allen Lumber Company
Attn: Mr. Ken Ford
117 East Industrial Drive
Post Office Box 290
Momence, Illinois 60954

Application No.: 99030006

I.D. No.: 091065ABG

Applicant's Designation: FLOW COATERS

Date Received: August 17, 2009

Subject: Flow Coating of Lumber Siding

Date Issued: February 11, 2010

Expiration Date: June 11, 2012

Location: 117 East Industrial Drive, Momence, Kankakee County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of seven (7) wood flow coating lines and a 500 gallon gasoline storage tank 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:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year of VOM, 10 tons/year for a single HAP and 25 tons/year for any combination of such 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.
 - ii. To establish 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 so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products, 40 CFR 63 Subpart QQQQ.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. The gasoline tank is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subparts A and CCCCC. The Illinois is administering the NESHAP on behalf of the USEPA under a delegation agreement.

- b. Pursuant to 40 CFR 63.11116(a), you must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
 - i. Minimize gasoline spills;
 - ii. Clean up spills as expeditiously as practicable;
 - iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
 - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- c. Pursuant to 40 CFR 63.11116(c), you must comply with the requirements of 40 CFR 63 Subpart CCCCCC by the applicable dates specified in 40 CFR 63.11113.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.321(a), 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, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 4a. Pursuant to 35 Ill. Adm. Code 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liter (250 gallons), unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 215.121(a) or

is fitted with a recovery system as described in 35 Ill. Adm. Code 215.121(b)(2).

- b. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, 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.
- c. Pursuant to 35 Ill. Adm. Code 215.583(a)(1), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing facility unless the tank is equipped with a submerged loading pipe.
- 5a. This permit is issued based on the source 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. 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.
- b. This permit is issued based on the wood building products flow coating lines not being subject to the NESHAP for Wood Preserving Area Sources, 40 CFR 63 Subpart QQQQQQ because the source does not use a pressure treatment process with any wood preservative containing chromium, arsenic, dioxins, or methylene chloride.
- 6a. Pursuant to 35 Ill. Adm. Code 215.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- b. Pursuant to 35 Ill. Adm. Code 215.583(b)(3), the requirements of 35 Ill. Adm. Code 215.583(a)(2) shall not apply to transfers of gasoline to a stationary storage tank at a gasoline dispensing facility if the tank has a capacity of less than 575 gallons.
- 7a. Pursuant to 40 CFR 63.6(e)(1)(i), at all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good

air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in 40 CFR 63.6(e)(3)), review of operation and maintenance records, and inspection of the source.

- b. Pursuant to 40 CFR 63.6(e)(1)(ii), malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a startup, shutdown, or malfunction, an owner or operator must comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with safety and good air pollution control practices.
- c. Pursuant to 40 CFR 63.6(e)(1)(iii), operation and maintenance requirements established pursuant to Section 112 of the Clean Air Act are enforceable independent of emissions limitations or other requirements in relevant standards.
- 8a. In the event that the operation of this emission unit 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.
- b. Gasoline shall be the only material stored in the above-referenced storage tank. The storage of any other material in the tank may require that the Permittee first obtain a construction permit from the Illinois EPA and then verify compliance with all applicable requirements.
- 9a. Operations and emissions from the seven coating lines, including all clean-up operations, shall not exceed the following limits:

VOM Usage and Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
11.875	95

These limits are based on maximum usage of materials containing VOM and the maximum emissions of VOM resulting from the maximum material use (i.e., all VOM from each material used being emitted and not reclaimed).

- b. This permit is issued based on negligible emissions of particulate matter from the affected coating lines. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.

- c. Emissions and operation of the 500 gallons gasoline storage tank shall not exceed the following limits:

Gasoline Throughput		VOM Emissions	
<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
2,900	29,000	0.05	0.44

These limits are based on maximum operating rate and the use of TANKS program Version 4.0.

- 10a. Operations and emissions from the Coating Lines #1A and #2A, including all clean-up operations, shall not exceed the following limits:

<u>Emission Unit</u>	<u>lb/hour</u>	<u>VOM Emissions</u>	
		<u>Tons/Month</u>	<u>Tons/year</u>
Coater #1A	8.0	4.38	35.04
Coater #2A	8.0	4.38	35.04
		Total:	70.08

These limits are based on the maximum allowable emission rate from 35 Ill. Adm. Code 215.301 and 8,760 hours/year of operation.

- b. This permit is issued based on negligible emissions of particulate matter from the Coating Lines #1A and #2A. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
- c. The above limitations were established in Permit 09080025, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.
11. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ.
12. Compliance with the annual limits of this permit 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).
- 13a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing

requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Conditions 14 and 15 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
14. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
 15. Pursuant to 35 Ill. Adm. Code 215.208(a), the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method

24A, 40 CFR Part 60, Appendix A. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.

- 16a. Pursuant to 40 CFR 63.10(b)(1), the owner or operator of an affected source subject to the provisions of 40 CFR Part 63 shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
 - b. 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.
17. Pursuant to 40 CFR 63.11116(b), you are not required to submit notifications or reports, but you must have records available within 24

hours of a request by the Illinois EPA or USEPA to document your gasoline throughput.

18. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 19a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Usage of materials containing VOM and/or HAPs, including all reclaimed, and type of each material, including all clean-up solvents (gallons/month and gallons/year);
 - ii. Density of each material containing VOM and/or HAPs (lbs/gallon);
 - iii. VOM and HAP content of each material (weight %);
 - iv. Gasoline throughput (gallons/month and gallons/year); and
 - v. Monthly and annual VOM and HAP emissions (tons/month and tons/year), with supporting calculations.
- 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 the 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.
20. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 21a. 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
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that this permit has been revised to include the operation of equipment described in Construction Permit 07110050 and 2 replacement lines from Construction Permit 09080025.

It should also be noted that the sanding operations, particulate matter filter control device, and natural gas-fired drying oven(0.17 mmBtu/hour) are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146 (aa)(3)and(4),(jj),and(fff),respectively.

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

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

Date Signed: _____

ECB:RBS:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating plant, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is handling over 100,000 gallons total for all paints and solvents. The resulting maximum emissions are below the levels (e.g., 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined 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, coatings used and control measures are more effective than required in this permit.

<u>Equipment</u>	<u>VOM (Tons/Year)</u>	<u>E M I S S I O N S Single HAP (Tons/Year)</u>	<u>Total HAPs (Tons/Year)</u>
7 Coaters	95.00	9.0	22.5
Storage Tank	<u>0.44</u>	<u> </u>	<u> </u>
Totals	95.44	< 10	< 25

ECB:RBS:psj