

217/782-2113

CERTIFIED MAIL

NOTICE OF INCOMPLETENESS

July 25, 1995

Dovetail Industries
Attn: Donald Brenner
200 North Artesian
Chicago, IL 60612

Application No.: 95060226
I.D. No.: 031600FWI
Applicant's Designation: WOOD PROD
Received: June 30, 1995
Operation of: Woodworking Operation
Location: 200 North Artesian, Chicago

The Agency has determined the above referenced operating permit application(s) to be incomplete because information was not provided as required by 35 Ill. Adm. Code 201.157.

Specifically, the following information must be supplied in order for the application to be considered complete:

1. Information which demonstrates compliance of the contact bonding station and the spray booths with 35 Ill. Adm. Code Subpart TT. Specifically include:
 - a. MSD sheets or Method 24 analysis for each coating applied in the contact bonding station and the spray booths which indicates the lb VOC/gal (minus water and exempt compounds), or
 - b. detailed volatile organic material emission calculations for the contact bonding station and the spray booths showing:
 - i. the maximum theoretical emissions pursuant to 35 Ill. Adm. Code 211.3690 are less than 100 tons/yr, and
 - ii. the potential to emit emissions pursuant to 35 Ill. Adm. Code 211.4970 are less than 25 tons/yr.
2. Detail particulate matter emissions from each spray booth which demonstrate compliance with 35 Ill. Adm. Code 212.321.

The Agency will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.157, this reapplication may incorporate by reference the data and information

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submitted to the Agency in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by the Agency and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

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

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

DES:REP:sad

cc: Region 1

217/782-2113

"REVISED"
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Met Displays, Inc., d/b/a Met Merchandising Concepts
Attn: Grant Gillihet
4201 West Belmont Avenue
Chicago, Illinois 60641

Application No.: 95060226 I.D. No.: 031600FWI
Applicant's Designation: WOODPROD Date Received: February 17, 1998
Subject: Woodworking Operation
Date Issued: March 4, 1998 Expiration Date: February 14, 2001
Location: 200 N. Artesian, Chicago

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 3 spray booths with filters, contact bonding station, 3 gas fired air make-up units, and a woodworking operation with dust collector as described in 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 the levels at which the source would be a major source, as further described in Attachment A. As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all current permits issued for this location.
- 2a. Material Usage, volatile organic material (VOM) content, and VOM emissions for the 3 spray booths and contact bonding station shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(gal/mo)</u>	<u>(gal/yr)</u>	<u>(lb VOM/gal)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Sealer	275	2,640	5.30	1,458	7.00
Thinner	55	300	6.75	372	1.01
Lacquer	385	3,960	5.30	2,041	10.50
Primer/Sealer	55	360	4.40	242	0.79
Stain(Semi-Transparent)	165	1,440	5.00	825	3.60
Cleaning Solvent	55	360	6.75	372	1.22
Contact Cement*	110	720	0.42	47	<u>0.15</u>
			Total		24.27

* Applied in the contact bonding station, all other materials applied in the spray booths.

These limits are based upon the maximum material usage, VOM content, and VOM emissions.

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- 3a. Natural gas shall be the only fuel fired in combustion equipment at the plant including the 3 air makeup units.
- b. Combined natural gas usage for the equipment indicated above shall not exceed the following limits:

Natural Gas Usage: 3.5 mmscf/month; 42 mmscf/year.

- c. Gas-fired fuel combustion emissions of nitrogen oxide (NO_x), carbon monoxide (CO), volatile organic material (VOM), sulfur dioxide (SO₂), and particulate matter (PM) from the fuel combustion equipment:

<u>Pollutant</u>	<u>Fuel Usage (mmscf/Yr)</u>	<u>Emission Factor (Lb/mmscf)</u>	<u>Emissions (Ton/Yr)</u>
NO _x	42	100	2.10
CO	42	21	0.44
VOM	42	3.8	0.08
SO ₂	42	0.6	0.01
PM	42	12	0.25

This table defines the potential emissions of the fuel combustion equipment and are based on the fuel fired and standard emission factors at the maximum annual fuel usage.

- 4. Particulate Matter (PM) emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Operating Hours (Hour/Year)</u>	<u>PM Emissions</u>	
		<u>(Lb/Hour)</u>	<u>(Ton/Yr)</u>
Woodworking Operation	3120	5.13	8

These limits are based on the maximum PM emission limit at the maximum operating rate. The annual limit is the product of hourly limit and the maximum hours of operation indicated in the permit application.

5. Compliance with annual limits shall be determined from a running total of 12 months of data.
 - 6a. Within 90 days of a written request from the Illinois EPA or USEPA, test shall be performed which will allow evaluation of a material(s) "as applied" in the spray booth and/or contact bonding station in order to determine compliance with the limits in Condition 2a and Attachment A.
 - b. These tests shall be performed by an approved independent laboratory by the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a).
 - c. The submitted data shall include VOM content of the materials (minus water and exempt compounds), a justification why the coatings are representative, a description of the sampling procedures, and documentation for the analysis.
 - 7a. The Permittee shall maintain records of the following items for the brakeshoe and disc pad manufacturing lines:
 - i. Usage of materials (sealer, thinner, lacquer, primer, stain cleaning solvent, and contact cement)(gal/month and gal/yr).
 - ii. VOM and HAP content of materials used (lb/gal).
 - iii. VOM and HAP emissions (lb/month and ton/yr) from the 2 spray booths and contact bonding station as calculated by the actual material usage, VOM content, and HAP content.
 - b. The Permittee shall maintain records of the following items for the fuel combustion equipment indicated in Condition 3a:
 - i. Natural gas usage (mmscf/month and mmscf/yr).
 - ii. Nitrogen oxide (NO_x) emissions as calculated by AP-42 emission factor (100 lb/mmscf) and the actual natural gas usage (lb/month and ton/yr).
 - c. All records shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request.
8. Any excesses of the requirements of this permit determined by the records required by Condition 7 shall be reported by the Permittee by submitting a report to the Illinois EPA's Compliance and Systems Management Section in Springfield, Illinois within 30 days after the occurrence of the

excess. The report shall include a copy of the relevant records, and a description of the excess or violation and efforts to reduce emissions and future occurrences.

Illinois Environmental Protection Agency
Bureau of Air
Compliance and Air Systems Management Section
P.O. Box 19276
Springfield, Illinois 62794-9276

9. This permit is issued based on VOM emissions which are not subject to the control requirements of 35 Ill. Adm. Code Part 218 Subpart F, as not being subject to the control requirements of 35 Ill. Adm. Code Part 218 Subpart TT as a result of the conditions above, which imposed production and operation limitation that constrain the VOM potential to emit to less than 25 tons/year.
10. This permit is issued based on the addition of a third spray booth with filters, without any increase in emissions of VOM, HAPs or particulate matter from the limitations previously established in the Federally Enforceable State Operating Permit.

The following special conditions are not federally enforceable:

11. Along with the Annual Emission Report required by May 1 of each year, the Permittee shall include the following information: material usage, VOM and HAP usage and emissions, natural gas usage and NO_x emissions from the prior calendar year. If there have been no excesses during the prior calendar year the Annual Emissions Statement shall include a statement to that effect.
12. 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.

Please note, the permit is revised to include a third spray booth with filters.

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

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

DES:JPB:sad

cc: IEPA Region 1
CASM
USEPA

Attachment A - Emissions Summary

1a. Emissions of VOM from the 3 spray booths and contact bonding station:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> (lb VOM/gal)	<u>VOM Emissions</u>	
	(gal/mo)	(gal/yr)		(Lb/Mo)	(T/Yr)
Sealer	275	2,640	5.30	1,458	7.00
Thinner	55	300	6.75	372	1.01
Lacquer	385	3,960	5.30	2,041	10.50
Primer	55	360	4.40	242	0.79
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Contact Cement*	110	720	0.42	47	<u>0.15</u>
			Total		24.27

* Applied in the contact bonding station, all other materials applied in the spray booths.

b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

2. Gas-fired fuel combustion emissions of nitrogen oxide (NO_x), carbon monoxide (CO), volatile organic material (VOM), sulfur dioxide (SO₂), and particulate matter (PM) from the fuel combustion equipment:

<u>Pollutant</u>	<u>Fuel Usage</u> (mmscf/Yr)	<u>Emission Factor</u> (Lb/mmscf)	<u>Emissions</u> (Ton/Yr)
NO _x	42	100	2.10
CO	42	21	0.44
VOM	42	3.8	0.08
SO ₂	42	0.6	0.01
PM	42	12	0.25

3a. Particulate Matter (PM) emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Operating Hours</u>	<u>PM Emissions</u>	
	(Hour/Year)	(Lb/Hour)	(Ton/Yr)
Woodworking Operation	3120	5.13	8

JPB:sad

217/782-2113

December 2, 1999

Met Displays, Inc.
d/b/a Met Merchandising Concepts
Attn: Grant Gillihet
4201 West Belmont Avenue
Chicago, Illinois 60641

I.D. No.: 031600FWI

Dear Mr. Gillihet:

Enclosed is a revised permit letter which reflects only a change of ownership. Please note that if you have changed or intend to change this operation it will be necessary to apply for revision of your air pollution permit(s).

If you have any questions or require any assistance concerning these matters, contact Karen Luparell at 217/782-2113.

Very truly yours,

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

DES:KJL:95060226:jar

Enclosure

cc: Region 1
I.D. File
Permit File