

217/782-2113

"Renewal"  
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Owens Corning Foam Insulation, LLC  
Attn: Joseph E. Hanna  
2710 Laude Drive  
Rockford, Illinois 61109-1497

I.D. No.: 201030AXM  
Application No.: 95100035

Date Received: July 13, 2006  
Date Issued: July 23, 2007  
Expiration Date<sup>1</sup>: July 23, 2012

Operation of: Polystyrene Foam Insulation Manufacturing Plant  
Source Location: 2710 Laude Drive, Rockford, Winnebago County, 61109  
Responsible Official: Joseph E. Hanna, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a polystyrene foam insulation 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.

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

ECB:DGP:psj

cc: Illinois EPA, FOS, Region 2  
CES  
Lotus Notes

1 Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 INTRODUCTION

1.1 Source Identification

Owens Corning Foam Insulation, LLC  
2710 Laude Drive  
Rockford, Illinois 61109-1497  
815\226-4627

I.D. No.: 201030AXM  
County: Winnebago  
Standard Industrial Classification: 3086, Plastic Foam Products

1.2 Owner/Parent Company

Owens Corning  
One Owens Corning Parkway  
Toledo, Ohio 43659

1.3 Operator

Owens Corning Foam Insulation, LLC  
2710 Laude Drive  
Rockford, Illinois 61109-1497

Nick Giacone, Safety and Environmental Leader  
815/226-4627

1.4 Source Description

The Owens Corning Foam Insulation, LLC plant is located at 2710 Laude Drive in Rockford, Illinois. The source manufactures foam insulation board. The board is made by adding a blowing agent under high pressure to molten polystyrene, and allowing the extruded material to expand as the blowing agent vaporizes.

Note: This narrative description is for informational purposes only and is not enforceable.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois 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
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

### 3.0 CONDITIONS FOR 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:

Blowing Agent Storage Tanks (Pressure Tanks)  
Off-Line Printing  
Hot Wire Cutter

- 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:

Line 1 and Line 2 Board Scoring  
Line 1 and Line 2 Flexographic Printing Presses  
Resin Storage Silos  
Auxiliary Vacuum Pump

- 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:

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)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

#### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.
- 3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70°F, the Permittee shall comply with the applicable requirements of 35 IAC 215.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.

### 3.3 Addition of Insignificant Activities

- 3.3.1 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).
- 3.3.2 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.
- 3.3.3 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 UNITS AT THIS SOURCE

Emission Unit	Description	Date Modified or Constructed	Emission Control Equipment
Lines 1 and 2 Barometric Legs	Extrusion Chamber Under Partial Vacuum	2007/2008	None
Lines 1 and 2 Finishing Equipment	Extruded Foam is Trimmed, Cut, Shaped into Final Product	1980	Baghouse and Cyclone
Grinder	Grinding of Recycled Foam	2006	Baghouse
Reclaim Extruder	Melting by Extrusion of Ground Scrap Foam for Later Reuse	1980	None
Staging and Warehouse Storage	Storage of Final Foam Product	1980	None

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of HCFC-142b, a Class II ozone depleting substance that is addressed by the Montreal protocol.

### 5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (CO, lead, NO<sub>2</sub>, ozone, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>).

### 5.3 Source-Wide Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 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. Pursuant to 35 IAC 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 the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

#### 5.3.3 Ozone Depleting Substances

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.

d. See Condition 5.6.3 which addresses use of an HCFC-142b.

#### 5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.5 Future Emission Standards

a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

#### 5.3.6 Episode Action Plan

a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information

specified in 35 IAC 244.144 and is incorporated by reference into this permit.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA Compliance Section for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

#### 5.3.7 PM<sub>10</sub> Contingency Measure Plan

Should the actual annual source-wide emissions of PM<sub>10</sub> equal or exceed 15 tons, then the Permittee shall prepare and submit a contingency measure plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U. This permit may also have to be revised or reopened to address this regulation (see Condition 9.12.2).

#### 5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there are terms for unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

#### 5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

#### 5.6 Source-Wide Production and Emission Limitations

##### 5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	23.45
Sulfur Dioxide (SO <sub>2</sub> )	--
Particulate Matter (PM)	2.52
Nitrogen Oxides (NO <sub>x</sub> )	--
HAP, not included in VOM or PM	--
Total	27.54

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. 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). This condition is being imposed so that the source is not a major source of HAP emissions. The Permittee shall fulfill the applicable recordkeeping requirements of Conditions 5.9.2.

5.6.3 Other Source-Wide Production and Emission Limitations

Pursuant to 40 CFR 82.16(c), effective January 1, 2010 no person may produce or import HCFC-142b for any purpose other than for use in a process resulting in their transformation or destruction. Therefore, effective January 1, 2010 the Permittee shall not purchase HCFC-142b.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, 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:

- a. 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. 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 [35 IAC 201.282(a)].

- b. 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 [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

#### 5.9 Source-Wide Recordkeeping Requirements

##### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.2 Records for HAP Emissions

The Permittee shall maintain records of HAP emissions on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12-month total basis) for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.3 Records for Other Source-Wide Emission Limitations

The Permittee shall keep records of the types of blowing agents purchased after January 1, 2010 to verify that they have not purchased HCFC-142b after January 1, 2010.

##### 5.9.4 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.

## 5.10 Source-Wide Reporting Requirements

### 5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

### 5.10.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information, including HAP emissions, for the previous calendar year.

## 5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there are provisions for unit specific operational flexibility set forth in Section 7 of this permit.

## 5.12 Source-Wide Compliance Procedures

### 5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

This section is reserved for emissions control programs. As of the date of issuance of this permit, there are no such programs applicable to this source.

## 7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

### 7.1 Foam Board Insulation Manufacturing Processes

#### 7.1.1 Description

The facility currently operates two polystyrene foam board extrusion lines and associated finishing, grinding and reclaiming equipment. The process operations at this facility include extruding molten polystyrene plastic which has been injected with a liquid blowing agent and other additives; allowing the extruded material to expand as the blowing agent vaporizes, under a partial vacuum in a barometric leg to produce a basic board stock with a closed cell structure; cooling the stock to a level suitable for further fabrication; trimming, cutting, and shaping the product; and reclaiming and recycling the scrap and waste polystyrene material.

The blowing agent emissions from the facility occur at five points: barometric legs; in-line finishing sections; the off-line grinder; reclamation units; and a staging area and warehouse. Blowing agent emissions occur gradually as it diffuses out of the surface of the board or the board is cut or scrap is ground creating new surface area.

The facility has been using HCFC-142b as the blowing agent but that material can not be produced or imported after January 1, 2010. The facility has been testing HFC and VOM-containing materials as blowing agents and will be phasing these in over the next few years.

The potential emissions for equipment and staging/warehouse are summarized in Attachment 5.

The facility is also a minor source of particulate matter (PM) due to the finishing of board and handling of scrap. Emissions are controlled by baghouses and cyclones.

Note: This narrative description is for informational purposes only and is not enforceable.

#### 7.1.2 List of Emission Units and Air Pollution Control Equipment

	Emission Unit	Description	Date Modified or Constructed	Emission Control Equipment
01	Lines 1 & 2 Barometric Legs	Extrusion Chamber Under Partial Vacuum	2007/2008	None
02	Lines 1 & 2 Finishing Equipment	Extruded Foam is Trimmed, Cut, and Shaped into Final Product	1980	Baghouse and Cyclone

	Emission Unit	Description	Date Modified or Constructed	Emission Control Equipment
03	Grinder	Grinding of Recycled Foam	2006	Baghouse
04	Reclaim Extruder	Melting by Extrusion of Ground Scrap Foam for Later Reuse	1980	None
05	Staging and Warehouse Storage	Storage of Final Foam Product	--	None

### 7.1.3 Applicable Provisions and Regulations

- a.
  - i. The "affected foam board extrusion line" for the purpose of these unit-specific conditions, is a process for manufacturing foam board and described in Emission Unit 01 in Conditions 7.1.1 and 7.1.2.
  - ii. The "affected reclaim processes" 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 for reuse. The various pieces of equipment are described in Emission Units 03 and 04 in Conditions 7.1.1 and 7.1.2.
  - iii. The "affected other blowing agent emitting processes" for the purpose of these unit-specific conditions is a process as described in Emission Units 02 and 05 in Conditions 7.1.1 and 7.1.2.
- b. Each affected foam board extrusion line process, each affected reclaim process and each affected other blowing agent emitting process is subject to 35 IAC 212 Subpart L. The method for calculating allowable pursuant to this is described in Attachment 2. Since all of the lines were constructed after 1972, §212.321 is the applicable rule.
- c. Emission units 02 and 03 are subject to the opacity limits specified in Condition 5.3.2(b).
- d. Each affected foam board extrusion line process and each affected other blowing agent emitting process is subject to 35 IAC 215 Subpart K. However, since none of the organic materials currently used in the process (i.e., the blowing agents) is photochemically reactive organic material as defined in 35 IAC 211.4690 and there is no odor nuisance neither the emission rate or control equipment option must be complied with. During trials of some new blowing agents as allowed by Construction Permit 05080034, the photochemical nature of the VOM-containing blowing agents will have to be evaluated.

- e. Each affected reclaim process is subject to 35 IAC 215 Subpart K when processing scrap containing VOM blowing agents as allowed by Construction Permit 06050078.

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. The affected Emission units 01, 04 and 05 not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.
- b. The affected Emission units 02 and 03 not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

#### 7.1.5 Control Requirements and Work Practices

- a. The foam board extrusion lines shall be operated with good air pollution control work practice to minimize emissions of blowing agent, including the following:
  - i. Performance of "rate checks" on each extrusion line on a regular schedule, which shall be at least twice per week of operation, with prompt correction action as required. For this purpose, rate check is an evaluation of the precision with which blowing agent is added to other raw materials in the extrusion line to make the polystyrene foam. Rate checks may be conducted by weighing the amount of blowing agent introduced into the extrusion line during a given period of time, by supplying blowing agent from a container, which is weighed at the beginning and end of the evaluation, by recording the data from a micro-motion mass flow sensor, or by other procedures approved by the Illinois EPA.
  - ii. Performance of "trim loss check" on each extrusion line on a regular schedule, which shall be once during every product run or at least once per day, with prompt correction action as required. For this purpose, a trim loss check is an evaluation of the scrap foam that is generated by trimming the edges of the product to its final desired shape. Trim loss checks may be conducted by one of the following methods:
    - A. Calculating the percentage of trim loss by using the weights of untrimmed and trimmed product; or

- B. Calculating the percentage trim loss using untrimmed and trimmed product widths; or
- C. By other procedures approved by the Illinois EPA.

The above requirements represent Best Available Control Technology (BACT) for emissions of HCFC, as required by the PSD rules.

- b. The Permittee shall follow good operating practices for the reclaim process and other blowing agent emitting processes, along with associated baghouses and cyclones, including periodic inspection, routine maintenance and prompt repair of defects, to minimize emissions of HCFC/HFC, VOM and PM.

The above limitations (a and b) were established in Permit 01030029, pursuant to 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 CAA, specifically the federal rules for PSD. The VOM term was added when the replacement board grinder was added on Construction Permit 06050078 and it allowed some polystyrene board manufactured off-site with VOM blowing agents to be ground in the replacement grinder [T1].

- c. Requirements for replacement grinder and associated control equipment constructed in 2006:
  - i. There shall be no visible emissions from the affected reclaim process baghouse.
  - ii. The Permittee shall follow good operating practices for the affected grinder, along with its associated baghouse, including periodic inspection, routine maintenance and prompt repair of defects, to minimize emissions of HCFC, VOM and PM.

The above limits were established in Permit 06050078 [T1].

- d. Approval of experimental trials:
  - i. This permit authorizes trial testing of 2 new types of alternative blowing agents to enable replacement of HCFCs (Hydrogenated Chlorofluorocarbons) at the Permittee's foam manufacturing facilities. One of these alternative blowing agents consists of HFCs (Hydrofluorocarbons) and the other consists of a VOM (Volatile Organic Material) blend. The HFC blowing agent is allowed by the source's current CAAPP Permit, #95100035.

- ii. The trial of the VOM blend blowing agents consists of up to 1152 hours of total operation using a blowing agent that was not previously permitted, and results in emissions of VOM.

The above trials were originally approved in Construction Permit 05080034 [T1].

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected foam board insulation manufacturing processes subject to the following:

- a. The ratio of the plant's HCFC emissions to extruded product throughput shall not exceed 86 lbs/ton, on a monthly average.

The above requirement represents Best Available Control Technology (BACT) for emissions of HCFC, as required by the PSD rules.

- b. i. The emissions of HCFC from staging/warehousing shall not exceed 39.5 lb/hour.
- ii. Emissions of HCFC from all other operations shall not exceed 187.2 lb/hour.
- c. i. Emissions of blowing agent from operations at the facility other than staging and warehousing (non-fugitive emissions) shall not exceed 82.0 tons per month and 819.8 tons per year.
- ii. Emissions of blowing agents from staging (i.e., temporary storage from production to warehouse) and warehousing (i.e., temporary storage from production to warehouse until shipped out) shall not exceed 19 tons per month and 174.5 tons per year. This limit is based on an average monthly 35.7 mm board feet of inventory.
- d. i. The materials used as blowing agents shall not be HAP.
- ii. Usage of HCFC for Non-VOM blowing agent by the facility shall not exceed:

<u>Maximum Blowing Agent HCFC Usage (Lb/Mo)</u>	<u>(Ton/Yr)</u>
484,000	2,899

- e. Compliance with annual emissions shall be based on the emissions from the current month and the previous 11 months of data.

The above limitations (a through e) were established in Permit 0103029, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits assure that the construction and/or modification addressed in the aforementioned permit does not cause or contribute to air pollution in violation of Titles I and VI of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 and HCFCs as ozone depleting substances [T1].

Note that pursuant to Condition 5.6.3, after January 1, 2010 HCFC-142b may no longer be purchased and thus the effective limit in (d)(ii) will become zero after the Permittee has used or reclaimed any remaining HCFC-142b purchased prior to January 1, 2010.

- f. Limits for the replacement grinder and associated control equipment constructed in 2006:
  - i. The amount of scrap foam grinded shall not exceed 600 tons/month and 6,000 tons/year.
  - ii. The emissions of HCFC from the affected process grinder shall not exceed 120.2 lbs/hour and 137.7 tons/year.
  - iii. The emissions of VOM from the affected reclaim process shall not exceed 5.7 lbs/hour and 23.3 tons/year.
  - iv. The emissions of particulate matter from the affected reclaim process grinder and other blowing agent emitting processes shall not exceed nominal emission rates of 0.60 lbs/hour and 2.54 tons/year.
  - v. Compliance with annual emissions shall be based on the emissions from the current month and the previous 11 months of data.

The above limitations (c)(i to v) were established in Permit 06050078, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits assure that the construction and/or modification addressed in the aforementioned permit is a natural minor emission unit and does not cause or contribute to air pollution in violation of Titles I and VI of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 and HCFCs as ozone depleting substances [T1].

It should be noted that some of the HCFC, HFC or VOM may be emitted from the extruder following the grinder but the emission calculation is based on the amount of blowing agent in the material to be processed in the grinder, whether emitted from the grinder or the extruder. It is assumed that 100% of blowing agent is emitted.

- g. The Permittee shall, for a period of 10 years or until the lines cease to use blowing agent that is a PSD pollutant, whichever occurs first, following resumption of regular operation after the modifications entailed in this project are made, operate the affected changes in such a manner that this project does not result in a significant increase in emissions of any PSD pollutant that would qualify it as a major modification for purposes of PSD.

The above limitation was established in Permit 06100018, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). This limit assures that the construction and/or modification addressed in the aforementioned permit is a natural minor emission unit and does not cause or contribute to air pollution in violation of Titles I and VI of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

- h. Conditions for experimental trials:
  - i. Emissions of VOM from the trial of the VOM blend blowing agents shall not exceed 8 tons total; and
  - ii. Total hours of operation for the trial of the VOM blend blowing agents shall not exceed 1152 hours.

The above limitations (h)(i and ii) were established in Permit 05080034, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits assure that the construction and/or modification addressed in the aforementioned permit is a natural minor emission unit and does not cause or contribute to air pollution in violation of Titles I and VI of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

#### 7.1.7 Testing Requirements

Residual amounts of HCFC/HFC, VOM or Non-VOM blowing agent in the product shall be demonstrated by employing standard or approved testing methods.

Each batch of material brought in from an outside source shall be tested for blowing agent content by analyzing a representative sample of the material or the blowing agent content may be supplied by the vendor, i.e. the outside source who supplied the material.

The approved test methods are air sampling taken in Tedlar bags and charcoal tubes and actual foam samples collected from operations, each being analyzed by the gas chromatography method. Actual determination of blowing agent emissions shall be by mass balance. Deviation from these methods will require notification to the Illinois EPA.

#### 7.1.8 Monitoring and Inspection Requirements

The Permittee shall inspect the grinder dust collection system and perform a visible emissions observation (opacity) of the grinder baghouse on a weekly basis.

#### 7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected foam board insulation manufacturing processes to demonstrate compliance with Conditions 5.6.1, 7.1.5 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items related to good air pollution control work practices:
  - i. The performance of rate checks on each extrusion line by any of the methods specified in condition 7.1.5(a)(i), including date and time; results, i.e., whether the blowing agent rate was within, above or below specification; whether corrective actions were initiated; and whether such actions were effective, as shown by the next rate check.
  - ii. The performance of trim loss checks on each extrusion line, including date and time; results, i.e., whether the trim was within, above or below specification; whether corrective actions were initiated; and whether such actions were effective, as shown by the next trim loss check.
- b. The Permittee shall maintain records of the following items for purposes of determining HCFC emissions:

Note: Although there are specific emission points within the process, Condition 7.1.6 limit blowing agent 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. However, there are specific limits for the grinders in Condition 7.1.6(f) and

the records must be sufficient to verify compliance with those conditions.

- i. Primary input information or measured values for each month.
  - A. Blowing agent, each type (lb/month).
  - B. HCFC/HFC and VOM blowing agents used.
  - C. Virgin polystyrene (lb/month).
  - D. Reclaimed polystyrene foam (lb/month).
  - E. Other ingredients, i.e., talc, flame retardant, color concentrate, etc. (lb/month).
  - F. Operating hours for extruders and barometric legs (hours/month).
  - G. Foam Board Density (lb/ft<sup>3</sup>).
  - H. Trim losses (%).
  - I. Finished product (board-feet).
  - J. Beginning inventory (board-feet).
  - K. Ending inventory (board-feet).
  - L. Total raw materials (lb/month).
  - M. Blowing agent in product (%).
  - N. Yield (%).
  - O. Scrap product (%).
  - P. Raw material consumption rate (lb/hr).
  - Q. Finished product shipped (board-feet).

ii. Established Factors

Values to be used in making emission calculation for loss of blowing agent in product over time [referred to as specifications in Condition (a)(i) and (ii) above], during on-site staging warehousing that have been determined by representative testing, which shall be updated as needed to be kept current.

The average blowing agent emission rate during the emission testing, with supporting documentation.

Note: The value may vary depending upon the specific product and time in storage.

- iii. Calculated data for each month for each type of blowing agent
    - A. Blowing agent usage.
    - B. Blowing agent retained in finished goods as shipped.
    - C. Blowing agent emissions. (A - B = C)
  - iv. Annual blowing agent emissions determined on a rolling 12-month average basis.
  - v. Ratio of blowing agent emissions to product, (lb/ton).
- c. Records for the reclaim process grinder:
- i. Visible emission observations (opacity) of the grinder baghouse (weekly).
  - ii. Inspection and maintenance repair log for the baghouse and cyclone.
  - iii. Primary input information or measured values for each month:
    - A. Polystyrene foam processed with a separate value for each type of blowing agent (lb/month); and
    - B. Blowing agent content of processed material (type and % by weight).
  - iv. Emissions calculated similar to 'b' above:  
  
Monthly and annual (rolling 12-month average) emissions of blowing agent and PM, based on monthly operating data and engineering calculations.
- d. The Permittee shall also fulfill the applicable recordkeeping and reporting requirements of the PSD rules, 40 CFR 52.21(r)(6), for the blowing agent conversion project [Condition 7.1.6(g)].
- e. For the experimental trials approved in Condition 7.1.5(d) and subject to Condition 7.1.6(h), the Permittee shall keep records of VOM emitted and total hours of operation of the trials.

#### 7.1.10 Reporting Requirements

##### a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of an affected foam board insulation manufacturing processes 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:

- i. Emissions of blowing agent from the affected foam board insulation manufacturing processes in excess of the limits specified in Condition 7.1.6 within 30 days of such occurrence.
- ii. Operation of the affected foam board insulation manufacturing processes in excess of the limits specified in Condition 7.1.3 within 30 days of such occurrence.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected foam board extrusion line 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:

Use of alternate HCFC/HFC or VOM blowing agents provided that the emission limits in Condition 7.1.6 will be met and the new agent is not a HAP.

#### 7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(b) and (c) is addressed by the requirements of Condition 7.1.5(c), the inspection requirements in Condition 7.1.8 and the records and reports required in Conditions 7.1.9 and 7.1.10.
- b. Compliance with Condition 7.1.5(a) and (b) is addressed by the records and reports required in Conditions 7.1.9 and 7.1.10.
- c. Compliance with Condition 7.1.5(d) is addressed by the requirements of Condition 7.1.6(h) and the records and reports required in Conditions 7.1.9(e) and 7.1.10.
- d. Compliance with Conditions 7.1.6(a)-(e) is addressed by the testing requirements in Condition 7.1.7, the records

required in Condition 7.1.9, and the reports required in Condition 7.1.10(a).

- e. The following formulas shall be used to calculate emissions:

Total Raw Material Consumption =

Virgin, lb + Reclaim, lb + Other, lb + Blowing Agent, lb

Blowing Agent % =

$$\frac{\text{Blowing Agent, lb}}{\text{Virgin, lb + Reclaim, lb + Other, lb + Blowing Agent, lb}}$$

Buoyancy Factor =

$$((100 + 0.075157 * (100/\text{Density} - 100/524))/100)$$

Yield =

$$\frac{((\text{Finished Product, bf} / 12 \text{ bf} / \text{ft}^3) * \text{Density, lb} / \text{ft}^3) * \text{Buoyancy Factor}}{\text{Total Raw Material Consumption, lb}}$$

Yield Loss =

$$1 - \text{Yield}$$

Manufacturing Emissions =

$$\text{Blowing Agent, lb} * \text{Yield Loss}$$

Average Residence Time of Finished Product in Inventory (Residence Time, Days) =

$$\frac{\text{Finished Product, bf}}{((\text{Beginning Inventory, bf} + \text{Finished Product, bf}) - \text{Ending Inventory, bf})} * \frac{365 \text{ Days per year}}{12 \text{ Months per year}}$$

Blowing Agent Loss (BA Loss), % =

$$(0.0848 + 0.1458 * \text{Log}(\text{Residence Time}))/100$$

Fugitive Emissions (from staging and warehousing) =

$$\frac{((\text{Finished Product, bf}/12 \text{ bf}/\text{ft}^3) * \text{Buoyancy Factor}) * \text{BA Loss, \%}}{\text{Residence Time, Days}} * \text{Days per Period}$$

Blowing Agent Emissions (lb) = Manufacturing Emissions + Fugitive Emissions

## 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 June 7, 2007 (the date of issuance of the proposed 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 that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. 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. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. 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;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

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 Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [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 determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency  
Bureau of Air  
Compliance & Enforcement Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

Notwithstanding the expiration date on the first page of this CAAPP permit, any Title I conditions that would be included in this permit in the future, which would be identified by a T1, T1N, or T1R designation, would remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions would either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) be newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 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.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- 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.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

#### 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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (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 applicable requirements; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

#### 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. At 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 including any logs, plans, procedures, or instructions required to be kept 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, Air Quality Planning 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 annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- 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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

- 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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- 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 [Section 39.5(7)(k)(iv) of the Act].

#### 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.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, 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 that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

#### 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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and 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

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

**10.0 ATTACHMENTS**

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: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- i. 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 subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

A. 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	lb/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

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

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

#### Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, [www.epa.state.il.us](http://www.epa.state.il.us). This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

##### Guidance On Revising A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-revising.pdf](http://www.epa.state.il.us/air/caapp/caapp-revising.pdf)

##### Guidance On Renewing A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-renewing.pdf](http://www.epa.state.il.us/air/caapp/caapp-renewing.pdf)

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

[www.epa.state.il.us/air/caapp/index.html](http://www.epa.state.il.us/air/caapp/index.html)

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)

Attachment 5 - HCFC Emission Limits and Net Increase in HCFC Emissions

Table I

<u>Emission Unit Description</u>	<u>(Lb/Hr)</u>	HCFC	
		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Staging/Warehousing	39.5	19.0	174.5
All Other	187.2	82.0	<u>819.8</u>
			994.3

Table II

Permitted Net Increase in HCFC Emissions

Permitted Emissions after Modification	994.3
Actual Emissions Prior to Modification	<u>358.3</u>
Net Increase	636.0

Note: This evaluation shows an increase that is greater than the expected increase because the new allowable reflects the facility's potential emissions. It is based on the facility storing the maximum amount of finished goods and operating both extrusion lines at the maximum rate for the product with the maximum blowing agent content and trim losses.

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