

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Hexacomb Corporation  
Attn: James Siegel  
11620 Old Highway 50, West  
Trenton, Illinois 62293

Application No.: 05010040

I.D. No.: 163806AAA

Applicant's Designation:

Date Received: January 19, 2005

Subject: Paper and Allied Products

Date Issued: November 3, 2005

Expiration Date: November 3, 2010

Location: 11620 Old Highway 50, West, Trenton

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of paper coating lines, 1.5 mmBtu/hr panel curing oven, paper gluing process, multiple trimmers/choppers with cyclone, and 4.2 mmBtu/hr boiler 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 major source thresholds (i.e., 100 tons/yr for volatile organic material (VOM), 10 tons/yr for a single hazardous air pollutant (HAPs), and 25 tons/yr for all HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all current operating permits issued for this location.
2. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
3. Pursuant to 35 Ill. Adm. Code 219.204, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emissions limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. The emission limitations are for paper coating (35 Ill. Adm. Code 219.204(c) 2.3 lb/gal.

- 4a. Operations and emissions from the paper coating lines shall not exceed the following limits:

<u>Material</u>	<u>Resin Application</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Paper Coating Lines (Resin)	138.75	1,665	6.57	73.1

These limits are based upon the maximum allowable VOM content, pursuant to agreements with the applicant, the maximum resin density, maximum resin application rate, and the maximum VOM emission rate indicated in the application for operation permit issued June 10, 1997. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Operations and emissions from the paper gluing process shall not exceed the following limits:

<u>Material</u>	<u>Glue Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Content</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Paper Gluing Process	34,103	409,231	0.13	2.22	26.6

These limits are based upon the maximum VOM content and maximum usage. Compliance with annual limits shall be determined from a running total of 12 months of data.

- c. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

5. Emissions of particulate matter (PM) and operation of the EDF line trimmers/choppers with cyclone shall not exceed the following limits:

<u>Equipment</u>	<u>Production</u>	<u>Emission</u>	<u>PM Emissions</u>	
	<u>Rate</u>	<u>Rate</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
EDF Line Trimmer/Chopper with Cyclone	7.38	0.06	0.166	1.66

These limits are based on the maximum of 7,500 hours of operation per year and maximum emissions of particulate matter. The emission rate is derived from assumptions of 3% of cut and trimmed becomes paper scrap and of this scrap 0.1% is assumed to be emitted into the atmosphere. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. Emissions and operation of the natural gas fired emission units shall not exceed the following limits:

Natural Gas Usage: 3.61 mmscf/month, 36.1 mmscf/year.

<u>Pollutant</u>	<u>Emission Factor</u> (Lb/mmscf)	<u>Emissions</u>	
		(Tons/Mo)	(Tons/Yr)
Nitrogen Oxide (NO <sub>x</sub> )	100.0	0.18	1.80
Carbon Monoxide (CO)	84.0	0.15	1.51
Particulate Matter (PM)	7.6	0.02	0.14
Volatile Organic Material (VOM)	5.5	0.01	0.10

These limits are based on the maximum fuel usage, standard emission factors AP-42, and 8,760 hours of operation per year. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

- 7a. The Permittee shall maintain records of the following items for the printing lines:
- i. Identification of each VOM containing material used (i.e., solvent, resin, glue, etc.);
  - ii. Monthly usage (lb/month and gal/month of each VOM containing material used (i.e., solvent, resin glue, etc.);
  - iii. VOM content (lb/gal) of each VOM containing material used (i.e., solvent, resin, glue, etc.);
  - iv. VOM and HAP emissions for each material (lb/month and ton/yr);
  - v. Month running total of annual VOM emissions, based on the sum of the current month's data and data from the preceding 11 month;
  - vi. Natural gas usage (mmscf/month and mmscf/year);
  - vii. Production rates of the EDF line trimmer/chopper (tons/month and tons/year); and
  - viii. PM emissions as calculated by Condition 5 (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by an Illinois EPA or USEPA request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

- 8a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, a description of the exceedances or violation, and efforts to reduce emissions and future occurrences.
- b. The Permittee shall notify the Illinois EPA in writing of any violation of Section 219.204 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation.
9. Two (2) copies of required reports and notifications concerning equipment operation, performance testing, or monitoring shall be sent to the following address, unless otherwise indicated:

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

and one (1) copy shall be sent to the Agency's regional office at the following address, unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

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

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

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cc: Region 3

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the paper coating facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/yr for volatile organic material (VOM), and hazardous air pollutants (HAPs) to less than 10 tons/yr of any single HAP or 25 tons/yr of any combination of HAPs), at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Equipment/Process</u>	<u>E M I S S I O N S</u>					
	<u>NO<sub>x</sub></u> <u>(Tons/Yr)</u>	<u>PM</u> <u>(Tons/Yr)</u>	<u>CO</u> <u>(Tons/Yr)</u>	<u>VOM</u> <u>(Tons/Yr)</u>	<u>Single HAPs</u> <u>(Tons/Yr)</u>	<u>Combined HAPs</u> <u>(Tons/Yr)</u>
Paper Coating				73.1		
Paper Gluing				26.6		
EDF Line Trimmer/Chopper with Cyclone		1.66				
Natural Gas Combustion	<u>1.80</u>	<u>0.14</u>	<u>1.51</u>	<u>0.10</u>		
	<u>1.80</u>	<u>1.80</u>	<u>1.51</u>	<u>99.8</u>	<u>&lt; 10</u>	<u>&lt; 25</u>

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