

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE -- RENEWAL

PERMITTEE

Custom Tapes, Inc.
Attn: Eugene Pomazak
7125 West Gunnison Street
Harwood Heights, Illinois 60656

Application No.: 85060023
Applicant's Designation:
Subject: Adhesive Tape Manufacturing Plant
Date Issued: September 12, 2000
Location: 420 Northgate Parkway, Wheeling

I.D. No.: 031324ACZ
Date Received: May 19, 2000
Expiration Date: September 12, 2005

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one adhesive coating line controlled by thermal afterburner pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for VOM, 10 tons/year for a single HAP and 25 tons/year for combined 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 issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. The adhesive coating line is subject to a New Source Performance Standard (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subparts A and RR. The Illinois EPA is administrating NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The VOM emissions from the adhesive coating line shall not exceed 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month (40 CFR 60.442(a)(1)) or the Permittee shall demonstrate a 90 percent overall VOC emission reduction as calculated over a calendar month (40 CFR 60.442(a)(2)(i)).
- c. At all times the Permittee shall also maintain and operate the adhesive

coating line, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the NSPS, 40 CFR 60.11(d).

3. When compliance with emission standard is achieved through the use of a solvent destruction device, the owner or operator shall continuously record the destruction device combustion temperature during coating operations.
4. Operation and VOM emissions of the adhesive coating line shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>Average</u>	<u>Control</u>	<u>VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>VOM Content</u> <u>(Wt.%)</u>	<u>Effic.</u> <u>(%)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Non-compliance						
Coating	30.0	320.0	51.5	90	1.5	16.5
Compliance						
Coating	25.0	250.0	0.5	B	0.1	1.3
Clean-up Solvent	0.2	2.0	100.0	B	0.2	2.0
					Total 19.8	

These limits define the potential emissions of VOM and are based on the actual emissions determined from the maximum production capacity. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus preceding 11 months.

5. The emissions of 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.
6. The Permittee shall maintain monthly records of the following items:
 - a. The name and identification number of each coating as applied;
 - b. Coating usage (ton/month and ton/year);
 - c. The weight percentage of VOM and HAPs for each coating as applied;
 - d. Clean-up solvent usage (ton/mo and ton/year);
 - e. VOM and HAP emission calculations (ton/mo and ton/year); and
 - f. The records of the afterburner continuous monitoring device.
 - g. The records of all 3-hour periods (during actual coating operations) during which the average temperature of the

afterburner combustion chamber is more than 28°C (50°F) below the average temperature of the device during the most recent performance test.

7. 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 the Illinois EPA or USEPA upon 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 be able to respond to an Illinois EPA request for records during the course of a source inspection.
8. 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 Unit 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, and a description of the exceedances or violation and efforts to reduce emissions and future occurrences.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

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

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Regional Office
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: coatings and solvent usage.

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

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

DES:VJB:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the adhesive tape manufacturing plant, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is using 320 tons of solvent coating and 250 tons of water based coating and 2 tons of clean-up solvent. The resulting maximum emissions are well below the levels, 25 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, coatings used and control measures are more effective than in this permit.

1. Operation and VOM emissions of the adhesive coating line shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>Average</u>	<u>Control</u>	<u>VOM Emissions</u>	
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