

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Chicago Gaming Cabinets
Attn: Roger Duba
2119 West Churchill Street
Chicago, Illinois 60647

Application No.: 99080089 I.D. No.: 031600GCI
Applicant's Designation: Date Received: August 26, 1999
Subject: Wood Cabinets Manufacturing
Date Issued: March 10, 2000 Expiration Date: March 10, 2005
Location: 3245 West 30th Street, Chicago, 60623

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of ten paint booths controlled by filters 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/yr for VOM, 10 tons/yr for a single HAP and 25 tons/yr 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.
2. This permit is issued based upon the paint booths not being a subject to the VOM emission limitations of 35 Ill. Adm. Code Part 218 Subpart F: "Coating Operations". This is a consequence of the federally enforceable limitations of this permit which limits VOM emissions from wood furniture coating operations below applicability threshold of 25 tons/year established by Section 218.208(b).
3. Operation and emissions of the paint booths shall not exceed the following limits:

a. VOM Emissions:

<u>Material</u>	VOM		<u>Content</u> (Lb/Gal)	VOM Emissions	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Paint	2,000	8,000	5.6	5.6	22.4
Cleanup Solvent	100	380	7.0	0.35	<u>1.3</u>
				Totals	23.7

b. PM Emission:

<u>Material</u>	Material Usage		PM Emissions	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Paint	2,000	8,000	0.15	0.6

These limits define the potential emissions and are based on the maximum production capacity, maximum VOM content in the paint, 55% paint overspray and 85% filters efficiency. 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.

4. 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.
5. The Permittee shall maintain monthly records of the following items:
 - a. The name and identification number of each coating and solvent used;
 - b. Coating and clean-up solvent usage(gal/mo and gal/yr);
 - c. The VOM and HAP content in the coatings and solvents (lb/gal);
 - d. VOM and HAP emission calculations (ton/mo and ton/yr).
6. 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 or USEPA request for records during the course of a source inspection.

7. 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.
8. 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

9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: paint and solvent usage. If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

It should be noted that the woodworking operations are exempt from state permit requirements pursuant to 35 Ill. Adm. Code 201.146(aa).

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

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 wood cabinets 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 8,000 gallons of paint and 380 gallons 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 emissions of the paint booths shall not exceed the following limits:

a. VOM Emissions:

<u>Material</u>	VOM		<u>Content</u> (Lb/Gal)	VOM Emissions	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Paint	2,000	8,000	5.6	5.6	22.4
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	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Paint	2,000	8,000	0.15	0.6

2. 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.

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