

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL
PERMITTEE

Jessup Manufacturing Company
Attn: Vilnis Gagainis
1701 Rockland Road
Lake Bluff, Illinois 60044

Application No.: 73010370

I.D. No.: 097809AAG

Applicant's Designation:

Date Received: October 19, 2000

Subject: Coating Lines

Date Issued:

Expiration Date:

Location: 1701 Rockland Road, Lake Bluff

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 1 Faustel coating line and 1 spreader coating line with both controlled by 1 single quadrant SR-10000 thermal afterburner, 1 tower coating line controlled by 1 thermal afterburner, 1 ST-COATER coating line, 1 laminator, and 1 natural gas boiler 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., VOM to less than 25 tons per year, and HAPs to less than 10 tons per year of any single HAP or 25 tons per year of any combination of such 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 the current operating permit(s) issued for this location.
- 2a. The capture system for the Faustel and Spreader coating lines shall be operated and maintained as a Permanent Total Enclosure (PTE) meeting the criteria of 35 Ill. Adm. Code 218, Appendix A, Procedure T. A PTE system is considered to obtain 100% capture.
- b. The 2 afterburners shall be operated and maintained to achieve at least 90% destruction of the VOM and HAPs entering the afterburner.
- c. When a coater is in operation, the associated afterburner shall be operated and maintained to meet or exceed the combustion temperature and

other relevant performance parameters measured during the most recent performance test.

- d. Each afterburner shall be equipped with a continuous temperature indicator and recorder, in accordance with 35 Ill. Adm. Code 218.105(d)(2).

- e. The Permittee shall perform periodic maintenance on the capture and afterburner systems to assure that the capture and destruction efficiencies do not decrease.
- f. The following records shall be collected and recorded each day for each coating line with afterburner, and retained for at least three years:
 - i. Afterburner monitoring data;
 - ii. A log of operating time for the afterburner and associated coating line(s);
 - iii. A maintenance log for the afterburner and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages.

3a. Total combined emissions and material usage (including VOM and HAP emissions associated with clean-up operations) from the all coating lines (consisting of Faustel, Spreader, Tower, ST-COATER and laminator coating lines and their associated flash-off areas, drying areas, capture and controls) shall not exceed the following limits:

i.	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
	19	228	1.9	22.8
ii.	<u>Combined HAP Usage</u>		<u>Combined HAP Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
	19	228	1.9	22.8
iii.	<u>Single HAP¹ Usage</u>		<u>Single HAP¹ Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
	8.2	99.0	0.82	9.90

¹ Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., toluene, MEK, hexane, vinyl acetate, formaldehyde, etc.).

These emissions are based on maximum monthly usage rates and 10% of the VOM and HAPs used being emitted (90% overall control) for the three controlled coaters. The water-based laminator and ST-COATER shall be included if any VOM or HAPs are in their coatings, at 100% emitted.

- b. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs,

or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP 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 CAAPP permit from the Illinois EPA.

- 4a. Compliance with the annual limits for the coating lines shall be determined daily using a rolling total of 12 months of data.
 - b. Compliance with the rolling annual limits, for each month of the 12 months period immediately following the issuance date of this permit, shall be determined using available data from the previous year.
 - c. Monthly emission calculations shall be made of the total emissions of VOM, total combined HAPs, and of single HAPs using the data specified in the record keeping requirements of this permit ,e.g., usage, density, and weight percent VOM and HAP content.
 - d. The monthly calculation of the emissions of VOM and HAPs shall be made using the VOM and HAP content as determined through the testing of the coating or solvent consistent with that specified in this permit, or if such testing has not been performed, data based on information supplied by the coating or solvent manufacturer or supplier may be used.
- 5a. Within 30 days of a written request from the Illinois EPA, the Permittee shall submit data on representative coatings and solvents as applied, determined by laboratory analysis in accordance with the procedures of 35 Ill. Adm. Code Section 218.105.
 - b. The submitted data shall include the weight percent VOM and/or HAP content of the coatings and solvents, a justification of why these are representative, and a description of the sampling procedures and documentation for the analysis.
 - c. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 30 days.
6. The Permittee shall collect and record the following information on at least a monthly basis for the coating lines:
 - a. A list giving the name and identification number of each coating as applied, solvent, clean-up solvent, and any other material used containing VOM;
 - b. VOM content by volume in lbs VOM per gallon of coating as applied (minus water and any compounds which are specifically exempt from the definition of VOM) for each coating used;
 - c. VOM content in weight percent for each coating, clean-up solvent and other materials used containing VOM;
 - d. A list of HAPs present and the weight percent content of each HAP for each coating, clean-up solvent and other materials used containing VOM;

- e. Density in pounds per gallon of each material used containing VOM;
- f. Actual usage rate of each material containing VOM used, in tons per month and tons per 12 months on a rolling total basis;

- g. Emissions of VOM, total combined HAPs, and of single HAPs on a monthly basis in tons/month and 12 months rolling total basis in tons/year.
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 or USEPA 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 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, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. For the ST-COATER coating line, the Permittee shall not apply at any time any coating in which the VOM content exceeds 2.9 lbs. VOM per gallon of coating (minus water and any compounds which are specifically exempted from the definition of VOM) pursuant to 35 Ill. Adm. Code 218.204(e).
10. Natural gas shall be the only fuel utilized at this source.
11. 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 Agency
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 Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

12. The Permittee shall submit the following additional information with the

Annual Emissions Report, due May 1st of each year: VOM usage and emissions and individual HAP usage and emissions, from the prior calendar year.

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

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

DES:JPB:jar

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

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating 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. The resulting maximum emissions are well below the levels, e.g., 25 tons/year VOM, 10 tons/year individual HAPs, and 25 tons/year combined HAP 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.

1. Emission Units:

All Coating Lines

a.

<u>VOM Usage</u>		<u>VOM Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
19	228	1.9	22.8

b.

<u>Combined HAP Usage</u>		<u>Combined HAP Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
19	228	1.9	22.8

c.

<u>Single HAP¹ Usage</u>		<u>Single HAP¹ Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
8.2	99.0	0.82	9.90

¹ Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., toluene, MEK, hexane, vinyl acetate, formaldehyde, etc.).

These emissions are based on maximum monthly usage rates and 10% of the VOM and HAPs used being emitted (90% overall control).

The emissions of this attachment define the potential emissions of the source.

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