

217/782-2113

JOINT CONSTRUCTION AND LIFETIME OPERATING PERMIT - NSPS SOURCE - REVISED

PERMITTEE

Mozel, Inc.
Attn: Mark Forthaus
4003 Park Avenue
St. Louis, Missouri 63110-2390

Application No.: 99030026

I.D. No.: 133005AAO

Applicant's Designation: PLANTWIDE

Date Received: June 13, 2002

Subject: Chemical Distribution and Custom Packaging

Date Issued: August 9, 2002

Operating Permit

Expiration Date: See Condition 1.

Location: 1900 West Gate Drive, Columbia

This permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Mixing Operations Controlled with Nitrogen Blanket
Filling and Handling Operations
Storage Tanks
InkJet Printers
Boiler

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This operating permit is effective only if the Permittee has complied with all standard conditions of the construction permit.
 - b. Operation of the emission units included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.
 - c. This operating permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
 - d. This permit shall terminate if it is withdrawn or is superseded by a revised permit.
2. These conditions effectively limit the potential emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 100 tons per year, individual hazardous air pollutants (HAP) to less than 10 tons per year, and a combination of such HAP to less than 25 tons per year). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.

- 3a. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Production</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Mixing Operations	2,765	27,650	0.1	0.9
Filling and Handling Operations	2,765	27,650	1.8	18.0

These limits are based on emission factors from stack testing (1.3 lb VOM/ton product), the maximum production rate, and the use of a nitrogen blanket for mixing. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. Emissions of volatile organic material from the storage tanks shall not exceed 0.1 ton/month and 0.88 tons/year. These limits are based on standard AP-42 emission factors.
- c. Emissions and operation of the InkJet printers shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Ink and Makeup	0.2	1.2	0.2	1.2

These limits are based on a material balance calculation and the maximum material usage. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- d. 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. The boiler is subject to a New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subparts A and Dc. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
 - b. At all times, the Permittee shall maintain and operate the boiler, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions, as required by the NSPS, 40 CFR 60.11(d).
 - c. The Permittee shall fulfill applicable notification and recordkeeping requirements of the NSPS, 40 CFR 60.7 and 60.48c.
 - d. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

<u>Fuel Usage</u>		<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>Factor</u>	<u>(Lb/10³ Gal)</u>	<u>(Lb/Mo)</u>

77,700	932,400	NO _x	21	1,632	9.8
		CO	3.6	280	1.7
		PM	0.6	47	0.3
		VOM	0.6	47	0.3
		SO ₂	0.1	8	0.05

These limits are based on maximum fuel usage and standard emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- e. Liquid petroleum gas shall be the only fuel(s) fired in fuel combustion equipment. Use of any other fuel will require a revised permit.
5. The Permittee shall maintain monthly records of the following items:
 - a. Production (tons/month and tons/year);
 - b. Material usage for the inkjet printers (tons/month and tons/year); and
 - c. Natural gas fuel usage for the boiler and afterburner (mmscf/month and mmscf/year); and
 - d. VOM and HAP emissions (tons/month and tons/year).
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 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.
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 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.
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 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
2009 Mall Street
Collinsville, Illinois 62234

Page 4

9. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
 - a. An increase in emissions above the amount the emission unit or the source is permitted to emit;
 - b. A modification;
 - c. A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
 - d. A change in ownership, company name, or address, so that the application or existing permit is not longer accurate.

It should be noted that the eight heaters are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(c).

Also note that this permit is revised to allow the use of a nitrogen blanket and reflect emissions based on stack testing.

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

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

DES:JPB:psj

cc: Region 3