

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Plastic Decorators, Inc.
Attn: Greg Miller, Environmental Affairs
1330 Holmes Road
Elgin, Illinois 60123

Application No: 02090019 I.D. No.: 089438AGC
Applicant's Designation: Date Received: September 10, 2002.
Subject: Increase in Material Usage
Date Issued: February 21, 2003
Location: 1330 Holmes Road, Elgin

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of an increase in material usage as described in the above referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Units Paint Department (PD)

1.1.1 Description

Group III multi-color paint spray booths are used to paint small plastic parts. Material usages and hours of operations from Group III will increase, as a result of an increase of the spray line speed and changes to the procedures of loading parts into the line.

1.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Group III	Booth 60 Serial No. 246742	None
	Booth 220 Serial No. M1	
	Booth 220 Serial No. 495309691	
	Booth 220 Serial No. 495309692	
	Booth Serial No. 59027357	
	Booth 25	

1.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit specific conditions, is each of the multi-color paint spray booths, as described in Condition 1.1.1 and 1.1.2.

- b. The affected coating line is subject to 35 IAC 212.321(a), which provides that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321.
 - ii. Because the expected process weight rate for each affected coating line is less than 100 pounds per hour, the allowable PM emission rate for each affected coating line set by 35 IAC 212.321 is 0.55 pounds per hour.
- c. Pursuant to 35 IAC 218.204, no owner or operator of the affected coating line shall apply at any time any coating in which the volatile organic material (VOM) content exceeds the following emission 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 as follows:
 - i. Plastic Parts Coating:
Automotive/Transportation/Specialty/Black Coatings, Reflective Argent Coatings, Air Bag Cover Coatings, and Soft Coatings [35 IAC 218.204(n) (3) (B)]:

<u>kg/l</u>	<u>lb/gal</u>
0.71	5.9
 - ii. Plastic Parts Coating:
Automotive/Transportation/Specialty/Stencil Coatings, Adhesion Promoters, Ink Pad Coatings, Electrostatic Prep Coatings, and Resist Coatings [35 IAC 218.204(n) (3) (D)]:

<u>kg/l</u>	<u>lb/gal</u>
0.82	6.8

1.1.4 Non-Applicability of Regulations of Concern

- a. The increase in material usage in the affected coating line is not a major modification subject to 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM) because the net emissions increase of VOM from the affected coating line is less than 25 tons per year, as shown in Attachment A.
- b. The affected coating line are not subject to 35 IAC 218.301, Use of Organic Material, because they are required to meet 35 IAC 218.204 [35 IAC 218.209].

1.1.5 Operational and Production Limits and Work Practices

At all times, the Permittee shall to the extent practicable, maintain and operate each affected coating line in a manner consistent with good air pollution control practice for minimizing emissions.

1.1.6 Emission Limitations

- a. Emissions of VOM from the affected coating lines combined shall not exceed 5.4 tons/month and 32.4 tons/year, provided that each affected coating line shall not exceed 4.9 tons/month and 24.9 tons/year.
- b. Emissions of PM from the affected coating line are negligible. For this purpose negligible emissions shall not exceed 0.1 lb/hr and 0.44 tons/year.

1.1.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

- a. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the

Permittee and the Permittee's records pursuant to Condition 1.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.

1.1.8 Monitoring Requirements

None

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 1.1.3, and 1.1.6.

- a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 1.1.7, which include the following:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- b. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating as applied on the affected coating lines; and
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected coating lines.
 - iii. Records of the coating usage for the affected coating line, gal/day, gal/mo and gal/yr.
 - iv. The VOM content in the coatings applied and cleanup solvents on each affected coating line, lb/gal and % by wt, respectively.

- v. Records of the cleanup solvent used in the affected coating line, lb/day, lb/mo and lb/yr.
 - vi. Records of the cleanup solvent recovered from the affected coating line, lb/day, lb/mo and lb/yr.
 - vii. The operating schedule of the affected coating line;
- c. The monthly and aggregate annual PM and VOM emissions from the affected coating line based on the material usage and operating schedule, with supporting calculations;

1.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA of noncompliance of an affected coating line with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Pursuant to 35 IAC 218.211(c) (3) (A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 1.1.3(c) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.
- b. Emissions of particulate matter in excess of limits in Condition 1.1.3(b) within 30 days of such an occurrence.
- c. Emissions of VOM in excess of the limits in Conditions 1.1.3(c) and 1.1.6(a) within 30 days of such an occurrence.

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

1.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 1.1.9 and the emission factors and formulas listed below:

To determine compliance with Condition 1.1.6, VOM emissions from the affected coating lines shall be calculated based on the following:

Volatile Organic Material Emissions:

VOM (lb) = (Coating Usage, gal) x (VOM Content of Coating, lb/gal) + (Cleaning Solvent Usage, lb) x (Cleaning Solvent VOM Content, wt. %/100) x [1 - (Cleaning Solvent Recovery**(%)/100)]

** As specified by testing pursuant to Condition 1.1.7(c).

2.0 Please note that the Permittee may operate under this construction permit until the next reopening of the CAAPP permit in which the modification in this construction permit shall be included.

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

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

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cc: Region 1

ATTACHMENT A

Change in VOM Emissions¹

VOM Emissions Increases With The Proposed Project

<u>Item of Equipment</u>	<u>Proposed Operation Date</u>	<u>VOM Actual Emissions (Tons/Year)</u>	<u>VOM Proposed Emissions (Tons/Year)</u>	<u>VOM Emissions Increase (Tons/Year)</u>
Group III	2002	7.85 ²	32.4 ³	24.5

¹ The only creditable changes in VOM emissions at the source over the last five calendar years have involved the Group III spray booths.

² Actual VOM emissions from Group III for 2000 and 2001.

³ Group III was previously allowed to emit 21.4 tons/year, pursuant to Construction Permit 00100070, which addressed replacement of one of the Group III spray booths (#25).

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