

217/782-2113

CONSTRUCTION PERMIT - REVISED

PERMITTEE

Allied Tube and Conduit Corporation
Attn: James C. Skalon
16100 South Lathrop Avenue
Harvey, IL 60426

Application No.: 95030157 I.D. No.: 031111ABD
Applicant's Designation: 031795ML9 Date Received: September 15, 1999
Subject: Mill #9
Date Issued: November 23, 1999
Location: 16100 South Lathrop Avenue, Harvey

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of Mill #9 as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Mill #9 shall comply with all applicable requirements of 35 Ill. Adm. Code 218.204.
- 2a. This permit is issued based upon new Mill #9 not constituting a major modification under 35 IAC Part 203 because it is accompanied by a contemporaneous and creditable net decrease of VOM emissions from the existing mills (Mills #1 to 6). The limits on existing equipment are contained in Tables 1 and 2. Permitted emissions of Mill #9 are established in Condition 3. The netting demonstration is summarized in Table 3.
- b. Upon achievement of normal operation of Mill #9 or 30 days after initial startup of Mill #9, whichever comes first, the limitations specified in Tables 1 and 2 become effective. These limitations address operations and emissions from existing Mills #1 to #6 combined, Mill #8, and the MEK storage tank.
- 3a. Material usage and emissions from Mill #9 shall not exceed the following limits:

<u>VOM Usage</u>		<u>VOM Emissions</u>	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
5.5	44.4	5.5	44.4

These limits are based on maximum coating usage, VOM content (lb VOM/gallon) of each coating, and emissions were determined by material balance. Emissions are based on 100% of the VOM used being emitted.

- b. Only non VOM cleanup solvent shall be used in Mill #9.
 - c. Compliance with annual limits shall be determined on a weekly basis from the sum of the data for the current week plus the preceding 51 weeks.
 - d. Compliance with monthly limits shall be determined from the sum of weekly data for that specific month. When only a portion of the week falls in the calendar month, the contribution of that week to that month shall be determined by prorating the appropriate portion. For example, three days of a week fall at the end of May, the contribution of that week to May is $3/7$ multiplied by the weekly value.
- 4a. The Permittee shall collect and record the following items each day for each mill:
- i. A list giving the name and identification number of each coating as applied, dilution solvent, clean-up solvent, and any other material used containing VOM.
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempt from the definition of VOM) as applied each day on each mill.
 - iii. The Permittee shall keep records of the test results conducted internally for each representative coating "as applied".
- b. The Permittee shall collect and record the following items for Mills #1 to 6 as a group, and individual records for Mill #8 and Mill #9.
- i. VOM content in weight percent for each material used containing VOM.
 - ii. Density in pounds per gallon of each material used containing VOM.
 - iii. Actual usage of coatings, solvent and any other material used containing VOM in tons/week, tons/month and tons/year.
 - iv. Emissions of VOM in tons/week, tons/month and tons/year.
- c. The Permittee shall collect and record cleanup solvent usage for Mills #1 to 6 in ton/week, ton/month and ton/year. VOM emissions from cleanup solvents shall be calculated from the difference in cleanup solvents taken from inventory and reclaimed cleanup solvents sent to temporary storage for ultimate outside disposal.

- d. All records 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 and USEPA upon request. Any records retained in computer shall be capable of being retrieved and printed on a paper during normal plant office hours, so as to be able to respond to the Illinois EPA request for information during the course of a plant inspection.
5. 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. This report should be sent to:
- Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
6. Annual Emission Reports are required to be submitted to the Illinois EPA pursuant to 35 Ill. Adm. Code Part 254.

This permit has been revised pursuant to a request from the Permittee to use contemporaneous emission decrease to demonstrate that Mill #9 is not a major modification. This revision did not alter the permitted VOM emissions of Mill #9, i.e., 44 tons/year, but does result in higher permitted emissions from existing Mills #1 and #6, i.e., 343 tons/year, compared to 330.1 previously allowed. Prior to issuance of the revised permit, a draft of the permit underwent a public notice and comment period.

If you have any questions on this permit, please call Bob Smet at 217/782-2113.

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

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cc: Region 1

Table 1: Mill #1 to #6

- 1a. Total combined emissions and VOM usage from mills #1 to #6 shall not exceed the following limits:

Coating and Cleanup Solvent VOM Usage		Coating and Cleanup Solvent VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
43.3	343.4	43.3	343.4

These limits are based on the maximum VOM used and a material balance taking 100% of the VOM used being emitted.

- b. Compliance with annual limits shall be determined on a weekly basis from the sum of the data for the current week plus the preceding 51 weeks.
- c. Compliance with monthly limits shall be determined from the sum of weekly data for that specific month. When only a portion of the week falls in the calendar month, the contribution of that week to that month shall be determined by prorating the appropriate portion. For example, three days of a week fall at the end of May, the contribution of that week to May is 3/7 multiplied by the weekly value.

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Table 2: Mill #8 and MEK Storage Tank

- 1a. i. Emissions and VOM usage from mill #8 shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
1.58	12.6	1.58	12.6

These limits are based on the maximum VOM usage and a material balance taking 100% of the VOM used being emitted.

- ii. Only non VOM cleanup solvents are permitted to be used in Mill #8.
- b. Emissions and operations of the MEK storage tank shall not exceed the following limits:

Throughput		Vapor Pressure	VOM Emissions	
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	of Material Stored	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
		<u>(mmHg)</u>		
5,080	60,955	70	0.06	0.44

- c. Compliance with annual limits shall be determined on a weekly basis from the sum of the data for the current week plus the preceding 51 weeks.
- d. Compliance with monthly limits shall be determined from the sum of weekly data for that specific month. When only a portion of the week falls in the calendar month, the contribution of that week to that month shall be determined by prorating the appropriate portion. For example, three days of a week fall at the end of May, the contribution of that week to May is 3/7 multiplied by the weekly value.

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Table 3: Netting Demonstration

<u>Emission Units</u>	<u>Representative Past Actual* VOM Emissions (Tons/Yr)</u>	<u>New Permitted VOM Emissions (Tons/Yr)</u>	<u>Change (Tons/Yr)</u>
Mill #1 to #6 (Combined)	390.62	343.42	- 44.4
Mill #8	-----	12.6	+ 12.6
Mill #9	-----	44.4	+ 44.0
Solvent Tank	-----	0.44	<u>0.44</u>
		Net Change	+ 13.04

* Based upon actual VOM emissions from the average of calendar years 1990 and 1991 on Mills #1 to #6. The VOM reduction of 2.8 ton/yr is not creditable because that reduction was needed for compliance purposes. Creditable VOM reduction available is $(390.62 - 343.42 - 2.8) = 44.4$ ton/yr.

This establishes an actual creditable VOM emissions decrease from existing Mills #1 to #6 of 44.4 ton/yr. Note that this emissions decrease is due to voluntary use of coatings containing less VOM.

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