

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Russell T. Bundy Associates, Inc.  
D/B/A Pan-Glo Chicago  
Attn: Scott Mouton  
417 East Water Street  
Post Office Box 150  
Urbana, Ohio 43078

Application No.: 92060055                      I.D. No.: 197085AAS  
Applicant's Designation: IEPAAP1111        Date Received: October 24, 2005  
Subject: Used Baking Pan Cleaning and Coating Line  
Date Issued:                                      Expiration Date:  
Location: Unit #3, 800 Moen Avenue, Rockdale

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of various processes for straightening and cleaning used baking pans, a coating line for coating such pans with drying and curing ovens vented to a thermal oxidizer with a filter on one vent, and several burners 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:
    - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for individual hazardous air pollutants (HAP) and 25 tons/year 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.
    - ii. To limit the emissions of volatile organic material from the source to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code part 205, Emission Reduction Market System. 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. The drying oven in conjunction with the pan coater shall be operated to meet the requirements of a permanent total enclosure (PTE) as described in 35 Ill. Adm. Code 218, Appendix B Procedure T.

- 3a. i. Whenever the control system for the pan coating line is operated, the minimum VOM destruction efficiency of the thermal oxidizer shall be 90% and minimum overall control for the entire pan coating line shall be 81% pursuant to 35 Ill. Adm. Code 218.207(b) (1).
- ii. In order to comply with this requirement the thermal oxidizer flame zone shall be heated to the manufacturer's recommended temperature but not lower than 1400 degrees F, before the coating process is begun and this temperature shall be maintained during the coating process.
- b. Thermal oxidizer flame zone shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the thermal oxidizer temperature. The Permittee shall retain all records of equipment operation and strip charts or disk storage for at least one year from the date of occurrence. These records shall be available for inspection by the Illinois EPA or USEPA.
- c. Notwithstanding 35 Ill. Adm. Code 218.107, the Permittee shall operate the afterburner from January 1 to November 30.

- 4a. i. Use of glaze, which contains VOM as received, solvent added to the glaze prior to use, VOM content of glaze and density of added solvent, and uncontrolled VOM emissions shall not exceed the following:

<u>Component</u>	Uncontrolled VOM Usage	
	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
Glaze	6,154	36.93
Solvent	<u>3,625</u>	<u>21.75</u>
Total	9,779	58.68

- ii. VOM emissions from VOM in both glaze and solvent combined after use of required control equipment shall not exceed the following:

<u>Time Period</u>	VOM Emissions <sup>a</sup>	
	<u>(Lbs/Mo)</u>	<u>(Tons/Yr)</u>
January-November	1,858	10.21
January-November Oxidizer Malfunction <sup>b</sup>		0.90
December	9,779	<u>4.89</u>
	Total	16.00

<sup>a</sup> After 81% control for months of January through November pursuant to Condition 3.

<sup>b</sup> Malfunction or breakdown of thermal oxidizer pursuant to Condition 6.

- b. Glaze and solvent usage may be interchanged provided that total VOM emissions meet the limit in the above table.

5. Emissions of any Hazardous Air Pollutant (HAP) as listed pursuant to Section 112(b) (1) of the CAA shall not exceed 9 tons/year and total HAPs shall not exceed 22.5 tons/year.
6. Operation of the coating line during malfunction or breakdown of the thermal oxidizer is allowed provided that the following requirements or circumstances are met.
  - a. The Permittee shall maintain an inventory of critical spare parts for the thermal oxidizer, its capture system, and monitoring devices.
  - b. The coater shall be immediately shutdown upon initial failure of the thermal oxidizer but the coater may be restarted after three hours if the thermal oxidizer has not been repaired within that time period.
  - c. Operation of the coater without the thermal oxidizer is allowed for a maximum of 28 hours for one incident and 50 total hours per year.
  - d. Emissions of VOM during malfunction or breakdown of the thermal oxidizer shall not exceed 35.1 lbs/hour or 0.9 tons/year.
7. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- 8a. The raw materials used on the cleaning operations listed in Condition 8b shall contain negligible VOM, i.e., less than 0.1 lb/gal.
- b. This permit is issued based on negligible emissions of all contaminants from the lead melting pot, soak tank, clean and deglaze tank, bleach tank, acid neutralization tank, and the conveyORIZED pan washer. For this purpose emissions of each contaminant from each emission unit shall not exceed nominal emission rates of 0.05 lb/hour and 0.22 tons/year.
9. VOM and HAP contents may be determined from material safety data sheet (MSDS). HAP emissions shall be determined using the same destruction efficiency as for VOM.
- 10a. The Permittee shall maintain records of the following items pursuant to the requirement of 35 Ill. Adm. Code 218.211(e).
  - i. Thermal oxidizer flame zone temperature (°F).
  - ii. Log of operating times for PTE, thermal oxidizer and flame zone temperature monitor.
  - iii. Maintenance log for capture and control system.

- b. The Permittee shall maintain records of the following items, with supporting information to allow the Illinois EPA to review compliance with the limits in this permit:
  - i. Glaze coating usage and VOM content (gallons/month).
  - ii. Solvent usage (gallons/month).
  - iii. VOM usage (lbs/month and tons/year).
  - iv. VOM emissions (lbs/month and tons/year).
  - v. HAP usage and emissions (tons/month and tons/year).
  - vi. Natural gas usage of boilers and dryers/ovens.
- c. The Permittee shall maintain records of excess emissions during malfunctions and breakdowns of the thermal oxidizer. At a minimum, these records shall include:
  - i. Date and duration of malfunction or breakdown;
  - ii. A full and detailed explanation of the cause for such emissions;
  - iii. The contaminants emitted and an estimate of the quantity of emissions;
  - iv. The measures used to reduce the quantity of emissions and the duration of the occurrence; and
  - v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.
- 11. 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.
- 12a. 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 exceedance or violation and efforts to reduce emissions and future occurrences.
- b. The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office,

pursuant to 35 IAC 201.263, concerning continued operation of the coating line with drying and curing ovens during malfunction or breakdown of the thermal oxidizer with excess emissions

- i. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction, or breakdown.
  - ii. Upon conclusion of the incident, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the coating line with drying and curing ovens were necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when the coating line with drying and curing ovens were taken out of service.
13. 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)  
1340 North Ninth Street  
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

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

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

DES:DLB:psj

cc: Illinois EPA, FOS Region 1  
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 below the levels, (i.e., 100 tons per year of VOM, 10 tons per year of any individual HAP, and 25 tons per year of any combination of 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 less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	<u>Individual HAP</u>	<u>Total HAPs</u>
Pan Coating Operation:						9	22.5
January-November (controlled)*					10.21		
January-November (malfunction)**					0.90		
December (uncontrolled)					4.89		
Lead Melting Pot	0.22	0.22	0.22	0.22	0.22		
Soak Tank	0.22	0.22	0.22	0.22	0.22		
Clean and Deglaze Tank	0.22	0.22	0.22	0.22	0.22		
Bleach Tank	0.22	0.22	0.22	0.22	0.22		
Acid Neutralization Tank	0.22	0.22	0.22	0.22	0.22		
Conveyorized Pan Washer	0.22	0.22	0.22	0.22	0.22		
Totals	1.32	1.32	1.32	1.32	17.32	< 10	< 25

<sup>a</sup> After 81% control for months of January through November pursuant to Condition 3.

<sup>b</sup> Malfunction or breakdown of thermal oxidizer pursuant to Condition 6.

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