

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Selig Sealing Products  
Attn: Robert Owen Smith  
342 East Wabash  
Forrest, Illinois 61741

Application No.: 95120137

I.D. No.: 105045AAJ

Applicant's Designation: EXTRUDER #2

Date Received: February 24, 2006

Subject: Coating and Printing

Date Issued: DRAFT

Expiration Date:

Location: 342 East Wabash, Forrest, Livingston County 61741

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three extruders, four laminating stations and eight flexographic printing stations, fuel combustion emission units, and three polyethylene pellet storage silos controlled by dust collector 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., volatile organic material to less than 100 tons per year). 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 all operating permits issued for this location.
- 2a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.

c. Pursuant to 35 Ill. Adm. Code 212.321(a), 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 which, 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 Ill. Adm. Code 212.321.

3a. Pursuant to 35 Ill. Adm. Code 215.204(c)(1), no owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to this Part, delivered to the coating applicator.

<u>Paper Coating</u>	<u>(Kg/Liter)</u>	<u>(Lbs/Gallon)</u>
All Paper Coating except Specialty High Gloss Catalyzed Coating	0.35	2.9

NOTE: These limitations shall not apply to equipment used for both printing and paper coating.

b. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.

4a. Emissions and operation of the coating and printing processes shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage and Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Acetone-Based Adhesive Solvent	10.6	84.8
Coreactant	0.8	6.4
Water-Based Adhesive	0.1	0.8
Solvent Based Ink	0.1	0.11
Water-Based Ink	0.4	5.17
Ink Solvent	0.1	0.6
Primer	0.1	0.1
Overcoat	<u>0.1</u>	<u>0.1</u>
Totals	12.23	98.1

These limits are based on the maximum material usage and the maximum VOM content.

- b. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

Total Maximum Firing Rate (mmBtu/Hour)	Pollutant	Emission Factor (Lbs/mmScf)	Emissions (Tons/Month)	Emissions (Tons/Year)
9.9	NO <sub>x</sub>	100.0	0.41	4.08
	CO	84.0	0.35	3.43
	PM	5.5	0.04	0.31
	VOM	7.6	0.03	0.22

These limits are based on standard 8,760 hour of operation per year, AP-42, tables 1.4-1 and 1.4-2 emission factors.

- c. Natural gas shall be the only fuel(s) fired in the fuel combustion equipment. Use of any other fuel will require a revised permit.
- d. This permit is issued based on negligible emissions of particulate matter from the three polyethylene pellet storage silos controlled by dust collector. For this purpose emissions from each emission unit, shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
5. 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.
6. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 7a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is

an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. The Permittee shall maintain records of the following items so as to demonstrate compliance with the limits in this permit.
  - i. Usage of each material (tons/month and tons/year);
  - ii. VOM and HAP content, as applied, of each material (weight %);
  - iii. Throughput of raw material, for pellet storage (tons/month and tons/year); and
  - iv. Monthly and annual PM, VOM and HAP emissions, with supporting calculations (tons/month and tons/year).
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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.
9. If there is an exceedance of or deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
10. Two (2) copies of required reports and notifications 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

It should be noted that this permit has been revised to include three polyethylene pellet storage silos controlled by dust collector.

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

Edwin C. Bakowski, P.E.  
Acting Manager, Permit Section  
Division of Air Pollution Control

ECB:GMK:psj

cc: Illinois EPA, FOS Region 3  
Lotus Notes

Attachment A - Emission Summary -

This attachment provides a summary of the maximum emissions from the coating and printing 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 (e.g., 100 tons/year for volatile organic material(VOM); and hazardous air pollutants (HAPs) to less than 10 tons/year of any single HAP or 25 tons/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>Equipment/Operation</u>	E M I S S I O N S (Tons/Year)					
	<u>VOM</u>	<u>PM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>HAPs</u>	
					<u>Single</u>	<u>Combined</u>
Coating and Printing Process	98.1					
Three Polyethylene Pellet Storage Silos		1.32				
Natural Gas Combustion	<u>0.22</u>	<u>0.31</u>	<u>4.08</u>	<u>3.43</u>		
Totals	98.32	1.63	4.08	3.43	< 10	< 25

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