

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) - RENEWAL

PERMITTEE

Olon Industries, Inc.
Attn: Gregory Kozuch - Operations Manager
411 Union Street
Geneva, Illinois 60134

Application No.: 73040806

I.D. No.: 089035AAK

Applicant's Designation:

Date Received: March 10, 2003

Subject: Coating Lines

Date Issued: December 13, 2006

Expiration Date: December 13, 2011

Location: 411 Union Street, Geneva, Kane County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three coating lines (Lines C, D and E) applying polyester coating and three laminators (Lines H-1, H-2, and H-3) (collectively referred as the affected coating lines) 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., volatile organic material to less than 100 tons per year, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such 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 potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 IAC Part 205, Emission Reduction Market System. The maximum VOM 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 public notice and a comment period.
- c. This permit supersedes the previous operating permit issued for this source.
- 2a. Pursuant to 35 IAC 218.204(c), no owner or operator of a coating line shall apply at any time any coating in which the 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:

	<u>kg/l</u>	<u>lb/gal</u>
Paper Coating	0.28	(2.3)

- b. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the nuisance.
- 3a. Emissions of VOM and operation of the affected coating lines shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1.8	9.0	1.8	9.0

These limits define the potential emissions of VOM and are based on maximum solvent usages as provided in the permit application, and material balance.

- b. This permit is issued based on the source using materials other than VOM and HAP for cleanup of the affected coating lines, such as soapy water or acetone. A permit change will be required for the use of VOM or HAP cleanup solutions.
- c. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act, from the source shall be less than 10 tons/year of any single HAP and 25 tons/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 Illinois EPA.
- d. 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).
- 4a. Within 30 days of applying a coating on an affected coating line with a VOM content greater than 0.25 lb/gallon, as determined from a Material Safety Data Sheet or other formulation data, the Permittee shall analyze a representative sample of the coating for VOM content in accordance with 35 IAC 218.105(a) and submit a copy of the results to the Illinois EPA.

- b. On an annual basis thereafter, the Permittee shall analyze representative samples of the coating containing more than 0.25 lb VOM/gallon used on the affected coating line and submit a copy of the results to the Illinois EPA.

- 5a. 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. Pursuant to 35 IAC 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 IAC 218.204 and complying by means of 35 IAC 218.204 shall collect and record following information each day for each 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.
 - 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.

- c. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

- i. HAP Content of each coating material, solvents and other HAP containing raw materials.
 - ii. The Permittee shall maintain the records of usage for each formulation or class of coatings, (ton/month and ton/year).
 - iii. The Permittee shall maintain records of total emissions of VOM and HAPs from the affected coating lines, based on the VOM and HAP content records required by Condition 5(b), along with supporting calculations (ton/month and ton/year).
6. 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.
- 7a. If there is an exceedance of or a 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.
- b Pursuant to 35 IAC 218.211(c) (3), any owner or operator of a coating line subject to the limitations of 35 IAC 218.204 of and complying by means of 35 IAC 218.204 shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 IAC 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance from 35 IAC 218.204 to 35 IAC 218.205 or 35 IAC 218.207, the owner or operator shall comply with all requirements of 35 IAC 218.207(d) (1) or (e) (1), respectively. Upon changing the method of compliance from 35 IAC 218.204 to 35 IAC 218.205 or 35 IAC 218.207, the owner or operator shall comply with all requirements of 35 IAC 218.207(d) or (e), respectively.
8. 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

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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 Manish Patel at 217/782-2113.

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

ECB:MNP:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachments

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions (ton/year) from the source 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 per year of VOM, 10 tons/year for any individual HAP, and 25 tons/year of any combination of such 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.

Emission Unit	Emissions (Tons/Year)						
	NO _x	CO	VOM	PM	SO ₂	Single HAP	Total HAP
Affected Coating Lines	---	---	9.0	---	---	< 10.0	< 25.0

MNP:psj