

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE

PERMITTEE

Duraco, Inc.
Attn: Steven Yacyshyn
7400 West Industrial Drive
Forest Park, Illinois 60130

<u>Application No.:</u> 03120015	<u>I.D. No.:</u> 031090ACF
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 8, 2003
<u>Subject:</u> Pressure Sensitive Tape Coaters	
<u>Date Issued:</u> June 4, 2004	<u>Expiration Date:</u> June 4, 2009
<u>Location:</u> 7400 West Industrial Drive, Forest Park	

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two pressure sensitive tape coater/laminators controlled by a permanent total enclosure and catalytic oxidizer, foam tape cutting/slitting and equipment solvent wipe cleaning operations, and two ozone surface treatment generators as described in 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 (VOM) to less than 100 tons per year, individual hazardous air pollutants (HAPs) to less than 10 tons per year and a combination of such HAPS to less than 25 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 permit(s) issued for this location.
- 2a. The two coating lines are subject to New Source Performance Standards (NSPS) 40 CFR 60, Subpart RR - Standard of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The coating lines shall comply with the following emission standards pursuant to 40 CFR 60.442:
 - i. Do not cause the discharge into the atmosphere more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or

- ii. Demonstrate for each coating line:
 - A. A 90 percent overall VOC emission reduction as calculated over a calendar month; or
 - B. The percent overall VOC emission reduction specified in Section 60.443(b) as calculated over a calendar month.
- c. At all times, the Permittee shall, to the extent practicable, maintain and operate coating line in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the New Source Performance Standard.
- 3. This permit is issued based upon the paper coating operations performed at the facility are subject to and shall comply with the volatile organic materials (VOM) emission limitations of 35 Ill. Adm. Code Part 218, Subpart F: Coating Operations. Compliance with the requirements of this subpart shall be achieved through the use of compliance coating pursuant to Section 218.204(c): the VOM content of the coatings, as applied, shall not exceed 2.3 lb/gal excluding water and any compounds which are specifically exempted from the definition of VOM, or through the use of a capture system and control device that provides 81 percent reduction in the overall VOM emissions and a control device has 90 percent efficiency, pursuant to 35 Ill. Adm. Code 218.207(b) (1).
- 4. The VOM emissions from the two coater/laminators shall not exceed 2.6 tons/mo and 21.0 tons/yr.

The VOM emissions shall be determined from the following equation:

$$E = \sum (S_i \times C_i) \times (1 - CE)$$

Where:

E - VOM emissions (ton)

S_i - Individual coating usage (ton)

C_i - VOM content of the individual coating (wt. fraction)

CE - Overall efficiency of the capture and control device (fraction) demonstrated during the most recent stack test

- 5a. The control system shall be in operation at all times when applied coatings are not in compliance with VOM content requirements of 35 Ill. Adm. Code 218.204(c).
- b. The control device shall be equipped with a monitoring device which is installed, calibrated, and maintained to continuously indicate and record the gas temperature both upstream and downstream of the catalyst bed.

6. VOM usage and emissions from equipment wipe cleaning and use of mold release agent shall not exceed 0.3 ton/mo and 2.3 ton/yr.
7. Emission of ozone from two ozone generators shall not exceed 3.2 lb/hour and 14.0 tons/year. These limits are based on the manufacturer's specification and year round operations.
8. 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.

9. The Permittee shall maintain monthly records of the following items:
 - a. Names and amounts of coatings used (ton/mo and ton/yr) and their VOM and HAP content (wt. %) separately for periods of times when control device was running and when emission to atmosphere was uncontrolled;
 - b. Control device operating hours and monitoring records;
 - c. Records of all 3-hour periods (during actual coating operations) during which the average temperature of the device immediately before the catalyst bed is more than 28°C (50°F) below the average temperature of the device during the most recent performance test, and all 3-hour periods (during actual coating operations) during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference of the device during the most recent performance test;
 - d. Compliance calculations required by 40 CFR 60.443(b); and
 - e. VOM and HAP emission calculations (ton/mo, ton/yr).
10. 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 the Illinois EPA request for records during the course of a source inspection.
11. 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 exceedances or violation and efforts to reduce emissions and future occurrences.

12. 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)
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

13. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
 - a. VOM and HAP total usage (tons/yr).

If you have any questions on this, please call Valeriy Brodsky 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 - Emission Summary

This attachment provides a summary of the maximum emissions from the pressure sensitive tape 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 well below the levels, e.g., 25 tons per year of volatile organic material, 10 tons per year of individual hazardous air pollutants, and 25 tons per year of a combination of hazardous air pollutants 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, less volatile organic material and hazardous air pollutants are used and control measures are more effective than required in this permit.

<u>Emission Units</u>	<u>VOM</u>	<u>Emissions (Tons/Year)</u>		<u>Ozone</u>
		<u>Single HAP</u>	<u>Total HAP</u>	
Two Coater/Laminators	21.0			
Wipe Cleaning and Mold Release	2.3			
Two Ozone Generators				14
Plant-Wide	23.3	< 10	< 25	14

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