

FINAL DRAFT CAAPP PERMIT
Central Products Company
I.D. No.: 077015ABX
Application No.: 95090099
January 3, 2000

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Central Products Company
Attn: Craig Hoedel, Plant Manager
2200 North McRoy Drive
Carbondale, Illinois 62901

<u>Application No.:</u> 95090099	<u>I.D. No.:</u> 077015ABX
<u>Applicant's Designation:</u>	<u>Date Received:</u> September 7, 1995
<u>Operation of:</u> Tape Coating Plant	
<u>Date Issued:</u>	<u>Expiration Date</u> ² :
<u>Source Location:</u> 2200 North McRoy Drive, Carbondale, Jackson	
<u>Responsible Official:</u> Craig Hoedel, Plant Manager	

This permit is hereby granted to the above-designated Permittee to OPERATE a tape coating source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Jason Schnepf at 217/782-2113.

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

DES:JMS:jar

cc: Illinois EPA, FOS, Region 3
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

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² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Central Products Company
2200 North McRoy Drive
Carbondale, Illinois 62901
618-529-0317

I.D. No.: 077015ABX
Standard Industrial Classification: 2672, Paper and Allied
Products

1.2 Owner/Parent Company

Central Products Company
2200 North McRoy Drive
Carbondale, Illinois 62901

1.3 Operator

Central Products Company
2200 North McRoy Drive
Carbondale, Illinois 62901

Craig Hoedel, Plant Manager
618-529-0317

1.4 General Source Description

The Central Products Company is located at 2200 North McRoy Drive in Carbondale, Illinois. The source manufactures a variety of consumer and industrial tapes. Tapes are made by applying an adhesive mixture to a substrate, such as paper or film.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
gal	Gallon
HAP	Hazardous Air Pollutant
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
Kg	Kilograms
KW	Kilowatts
L	Liter
lb	Pound
mg	Milligrams
mmBtu	Million British thermal units
mmscf	Million Standard Cubic Feet
mo	Month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	Parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
SRS	Solvent Recovery System
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit

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T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound
VOM	Volatile Organic Material
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

10,000 Gallon Toluene Storage Tank
10,000 Gallon Tolusol Wht Storage Tank
10,000 Gallon Solvent Reclaim Storage Tank
2,000 Gallon Adhesive Storage Tanks
Mixers
Totes
Solvent Recovery Still

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Coating Line 41

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or blended

contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coating Line 44	Hot Melt and Solvent Paper and Film Coating Line	1994	SRS
Coating Line 51	Adhesive and Solvent Paper and Film Coating Line	1994	SRS and Thermal Oxidizer
Coating Line 52	Adhesive and Solvent Paper and Film Coating Line	1994	SRS and Thermal Oxidizer
SB-1 and SB-2	Two 25.2 mmBtu/Hr Natural Gas-Fired Kewanee Boilers	1994	None
Air Stripper	Decant Water Air Stripper	1996	SRS
Fugitive VOM Emissions	Fugitive Emissions from Clean-Up Coaters 44, 51, 52	----	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. 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 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5
- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
 - b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any

potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following

source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	249
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	8
Nitrogen Oxides (NO _x)	50
HAP, not included in VOM or PM	---
TOTAL	307

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

The annual emissions from the source shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)	Underlying Rules
VOM	245	40 CFR 52.21

The limits on VOM are limitations established in Permit 93040039, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. See Condition 7.1.6 [T1].

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 (running 12 month total).

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in

response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and
- b. The total annual emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

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5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

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6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Solvent Based Coating Lines
 Control: SRS, Thermal Oxidizer

7.1.1 Description

These coating lines are used to apply an adhesive mixture to a substrate, such as paper or film to make consumer and industrial tapes. These coating lines can apply solvent-based formulas. Emissions of VOM result from the coating of solvent based formulas. The release station of Coating Line 44 is vented to the solvent recovery system. The hot melt station on coating line 44 is not vented to a pollution control device. The bulk of the solvent laden air from coating lines 51 and 52 is ducted to the solvent recovery system. The remaining solvent laden air from the final drying ovens is ducted to the thermal oxidizer. These coaters can also apply hot-melt (coating line 44) and water-based coatings (coating line 51 and 52).

After the substrate is coated, it is dried in a series of ovens. Coating line 51 utilizes direct natural gas fired ovens or indirect steam heated ovens. Coating lines 44 and 52 have ovens, which are heated indirectly with hot oil and steam.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Coating Line 44	Hot Melt and Solvent Paper and Film Coating	SRS
Coating Line 51	Hot Melt and Solvent Paper and Film Coating	SRS and Thermal Oxidizer
Coating Line 52	Hot Melt and Solvent Paper and Film Coating	SRS and Thermal Oxidizer

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected coating line" for the purpose of these unit-specific conditions, is a coating line as described in conditions 7.1.1 and 7.1.2.

- b. Each affected coating line is subject to the emission limits identified in Condition 5.2.2.
- c. The affected coating lines are subject to 35 IAC 212.321(a), which provides that 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 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].
- d. The affected coating lines are subject to the NSPS for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60 Subparts A and RR, because each coating line is used in the manufacture of pressure sensitive tape and label materials, and each coating line began construction, modification, or reconstruction after December 30, 1980. The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.
- e. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].
- f. Each affected coating line is subject to 35 IAC 215 Subpart F, which provides that:
 - i. 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 [35 IAC 218.204(c)]:

	Kg/l	lb/gal
All Paper Coating Except Specialty High Gloss Catalyzed Coating	0.35	2.9
Specialty High Gloss Catalyzed Coating	0.42	3.5

- ii. Owners or operators of coating lines subject to 35 IAC 215.204 may comply with 35 IAC 215.205, rather than with 35 IAC 215.204. The methods or procedures used to determine emissions of organic material under this Section shall be approved by the Illinois EPA. Emissions of volatile organic material from sources subject to 35 IAC 215.204, are allowable, notwithstanding the limitations in 35 IAC 215.204, if:
 - A. The emissions are controlled by an afterburner system which provides:
 - 1. 81% reduction in the overall emissions of volatile organic material from the coating line [35 IAC 215.205(b)(1)], and
 - 2. Oxidation to carbon dioxide and water of 90% of the nonmethane volatile organic material (measured at total combustible carbon) which enters the afterburner [35 IAC 215.205(b)(2)].
 - B. The system used to control such emissions is demonstrated to have control efficiency equivalent to or greater than that provided under the applicable provision of 35 IAC 215.204 or 35 IAC 215.205(b) [35 IAC 215.205(c)].

7.1.4 Non-Applicability of Regulations of Concern

- a. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.1.5 Operational And Production Limits And Work Practices

- a. The owner or operator shall cause the discharge into the atmosphere from an affected coating line not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month [40 CFR 60.442(a)(1)]; or
- b. Demonstrate for each affected facility:
 - i. A 90 percent overall VOC emission reduction as calculated over a calendar month [40 CFR 60.442(a)(2)(i)]; or
 - ii. The percent overall VOC emission reduction specified in 40 CFR 60.443(b) as calculated over a calendar month [40 CFR 60.442(a)(2)(ii)].
- c. For operation of the affected coating lines not ducted to the SRS, the thermal oxidizer combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1330 degrees F, before the affected coating line process is begun, unless a lower temperature or a three hour average temperature demonstrates compliance through testing; after coating is begun, the temperature used to demonstrate compliance shall be used.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating lines are subject to the following:

- a. Usage of solvent and emissions on coating lines 44, 51, and 52 combined shall not exceed the following limits:

Solvent Usage ^a		VOM Emissions ^b	
(Ton/Mo)	(Ton/Yr)	(Ton/Mo)	(Ton/Yr)
450	5,000	22.1	245

^a Fresh and recovered solvent

^b After control with the solvent recovery system or afterburner

These limits are based on the minimum overall control efficiency of the SRS and the thermal oxidizer (95.1%) and the maximum VOM usage.

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 (running 12 month total) [T1].

The above limitations were established in Permit 93040039, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.1.7 Testing Requirements

- a. The performance test for affected coating lines complying with 40 CFR 60.442 without the use of add-on controls shall be identical to the procedures specified in 40 CFR 60.443(a) (See also condition 7.1.12) [40 CFR 60.444(a)].
- b. The performance test for affected coating lines controlled by a solvent recovery device shall be conducted as follows [40 CFR 60.444(b)]:

- i. The performance test shall be a one calendar month test and not the average of three runs as specified in 40 CFR 60.8(f) [40 CFR 60.444(b)(1)].
 - ii. The weighted average mass of VOC per mass of coating solids applied for a one calendar month period shall be determined as specified in 40 CFR 60.443(a)(1) and (2) (See also condition 7.1.12) [40 CFR 60.444(b)(2)].
 - iii. Calculate the required percent overall VOC emission reduction as specified in 40 CFR 60.443(b) (See also condition 7.1.12) [40 CFR 60.444(b)(3)].
 - iv. Inventory VOC usage and VOC recovery for a one calendar month period [40 CFR 60.444(b)(4)].
 - v. Determine the percent overall VOC emission reduction as specified in 40 CFR 60.443(c) (See also condition 7.1.12) [40 CFR 60.444(b)(5)].
- c. The performance test for affected coating lines controlled by a solvent destruction device shall be conducted as follows [40 CFR 60.444(c)]:
- i. The performance of the solvent destruction device shall be determined by averaging the results of three test runs as specified in 40 CFR 60.8(f) [40 CFR 60.444(c)(1)].
 - ii. Determine for each affected coating line prior to each test run the weighted average mass of VOC per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in 40 CFR 60.443(a) (See also condition 7.1.12). In this application the quantities of W_{oi} , W_{si} , and M_{oi} shall be determined for the time period of each test run and not a calendar month as specified in 40 CFR 60.441 [40 CFR 60.444(c)(2)].

- iii. Calculate the required percent overall VOC emission reduction as specified in 40 CFR 60.443(b) (See also condition 7.1.12) [40 CFR 60.444(c)(3)].
- iv. Determine the percent overall VOC emission reduction of the solvent destruction device by the following equation and procedures [40 CFR 60.444(c)(4)]:

$$R = [(\sum Q_{bi}C_{bi} - \sum Q_{aj}C_{aj}) / (\sum Q_{bi}C_{bi} + \sum Q_{fk}C_{fk})] \times 100$$

Where:

- R = The overall VOC emission reduction achieved for a calendar month (in percent).
- a = The gas stream vents exiting the emission control device.
- b = The gas stream vents entering the emission control device.
- C_{aj} = The concentration of VOC (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.
- C_{bi} = The concentration of VOC (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.
- C_{fk} = The concentration of VOC (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.
- Q_{aj} = The volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic meters per hour.

Q_{bi} = The volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic meters per hour.

Q_{fk} = The volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic meters per hour.

- A. The owner or operator of the affected coating line shall construct the overall VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in 40 CFR 60.446(b) [40 CFR 60.444(c)(4)(i)].
- B. The owner or operator of an affected coating line shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive VOC emissions. If a permanent total enclosure exists in the affected coating line prior to the performance test and the Illinois EPA is satisfied that the enclosure is totally capturing fugitive VOC emissions, then no additional total enclosure will be required for the performance test [40 CFR 60.444(c)(4)(ii)].
- C. For each affected coating line where the value of R is greater than or equal to the value of R_q calculated in 40 CFR 60.443(b), compliance with 40 CFR 60.442(a)(2) is demonstrated [40 CFR 60.444(c)(4)(iii)].
- d. The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 215.105 except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring

energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A incorporated by reference in Section 215.105. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].

- e. Transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA [35 IAC 215.208(b)].
- f. The VOC content per unit of coating solids applied and compliance with 40 CFR 60.422(a)(1) shall be determined by either Reference Method 24 and the equations specified in 40 CFR 60.443 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Illinois EPA may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Reference Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate [40 CFR 60.446(a)].
- g. Reference Method 25 shall be used to determine the VOC concentration, in parts per million by volume, of each effluent gas stream entering and exiting the solvent

destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere. Reference Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flowrate, molecular weight, and moisture of all sampled gas streams. For Reference Method 25, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Illinois EPA [40 CFR 60.446(b)].

- h. If the owner or operator can demonstrate to the Illinois EPA's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Illinois EPA will approve testing of representative stacks on a case-by-case basis [40 CFR 60.446(c)].

7.1.8 Monitoring Requirements

- a. Where compliance with 40 CFR 60.442(a)(2) is achieved through the use of a solvent destruction device, the owner or operator shall continuously record the destruction device combustion temperature during coating operations for thermal incineration destruction devices or the gas temperature upstream and downstream of the incinerator catalyst bed during coating operations for catalytic incineration destruction devices. For thermal incineration destruction devices the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28°C (50°F) below the average temperature of the device during the most recent performance test complying with 40 CFR 60.442(a)(2) [40 CFR 60.443(e)].
- b. The owner or operator of an affected coating line controlled by a solvent recovery device shall install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of solvent recovered by the device over a calendar month period. The monitoring device shall be accurate within ±2.0

percent. The owner or operator shall maintain a calendar month record of the amount of solvent recovered by the device [40 CFR 60.445(c)].

- c. The owner or operator of an affected coating line controlled by a thermal incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or $\pm 2.5^{\circ}\text{C}$ [40 CFR 60.445(e)].
- d. The owner or operator of an affected coating line controlled by a solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. No continuous monitor shall be required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected coating line's oven recirculation air system [40 CFR 60.445(g)]

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with condition 5.5.1 and 7.1.6(a), pursuant to Section 39.5(7)(b) of the Act:

- a. The owner or operator of an affected coating line shall maintain a calendar month record of all coatings used and the results of the reference test method specified in 40 CFR 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings [40 CFR 60.445(a)].
- b. The owner or operator of an affected coating line controlled by a solvent recovery device shall maintain a calendar month record of the amount of solvent applied in the coating at each affected coating line [40 CFR 60.445(b)].

- c. Amount of HAP in the solvent applied in the coating (tons/month and tons/year).
- d. VOM and HAP emissions from the coating lines (tons/month and tons/year).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected coating lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. For all affected coating lines subject to compliance with 40 CFR 60.442, the performance test data and results from the performance test shall be submitted to the Illinois EPA as specified in 40 CFR 60.8(a) [40 CFR 60.447(a)].
- b. Following the initial performance test, the owner or operator of each affected coating line shall submit quarterly reports to the Illinois EPA of exceedances of the VOC emission limits specified in 40 CFR 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Illinois EPA semiannually [40 CFR 60.447(b)].
- c. The owner or operator of each affected coating line shall also submit reports at the frequency specified in 40 CFR 60.7(c) when the incinerator temperature drops as defined under 40 CFR 60.443(e). If no such periods occur, the owner or operator shall state this in the report [40 CFR 60.447(c)].
- d. The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State [40 CFR 60.447(d)].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. To determine compliance with 40 CFR 60.442 (See also condition 7.1.5(a)) the owner or operator of the affected facility shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures [40 CFR 60.443(a)]:
- i. Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data [40 CFR 60.443(a)(1)].
 - ii. Compute the weighted average by the following equation [40 CFR 60.443(a)(2)]:

$$G = (\sum W_{oi} M_{ci}) / (\sum W_{si} M_{ci})$$

Where:

G = The volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of applied coating solids (kilograms per liter).

W_{oi} = The weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or coating manufacturer's formulation data.

M_{ci} = The total mass (kg) of each coating (i) applied during the calendar month as determined from facility records.

W_{si} = The weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or coating manufacturer's formulation data.

- iii. For each affected coating line where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected coating line is in compliance with 40 CFR 60.442(a)(1) [40 CFR 60.443(a)(3)].
- b. To determine compliance with 40 CFR 60.442(a)(2) (See also condition 7.1.5(b)), the owner or operator shall calculate the required overall VOC emission reduction according to the following equation:

$$R_q = [(G-0.20)/G] \times 100$$

Where:

R_q = The required overall VOC emission reduction (in percent).

G = The volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of applied coating solids (kilograms per liter).

If R_q is less than or equal to 90 percent, then the required overall VOC emission reduction is R_q . If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent [40 CFR 60.443(b)].

- c. Where compliance with the emission limits specified in 40 CFR 60.442(a)(2) (See also condition 7.1.5(b)) is achieved through the use of a solvent recovery system, the owner or operator shall determine the overall VOC emission reduction for a one calendar month period by the following equation:

$$R = [(M_r)/(\sum W_{oi}M_{ci})] \times 100$$

Where:

- R = The overall VOC emission reduction achieved for a calendar month (in percent).
- M_r = The total mass (kg) of solvent recovered for a calendar month.
- W_{oi} = The weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or coating manufacturer's formulation data.
- M_{ci} = The total mass (kg) of each coating (i) applied during the calendar month as determined from facility records.

If the R value is equal to or greater than the R_q value specified in 7.1.12(b), then compliance with 40 CFR 60.442(a)(2) is demonstrated [40 CFR 60.443(c)].

- d. Where compliance with the emission limit specified in 40 CFR 60.442(a)(2) (See also condition 7.1.5(b)) is achieved through the use of a solvent destruction device, the owner or operator shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction specified in paragraph (b)(1) of this section to the overall VOC emission reduction demonstrated in the most recent performance test which complied with 40 CFR 60.442(a)(2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with §60.442(a)(2) [40 CFR 60.443(d)].
- e. After the initial performance test required for all affected facilities under 40 CFR 60.8, compliance with the VOC emission limitation and percentage reduction requirements under 40 CFR 60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard [40 CFR 60.443(f)].

- f. If a common emission control device is used to recover or destroy solvent from more than one affected coating line, the performance of that control device is assumed to be equal for each of the affected facilities. Compliance with 40 CFR 60.442(a)(2) is determined by the methods specified in 40 CFR 60.443(c) and (d) (See also 7.1.12(c) and (d)) and is performed simultaneously on all affected coating lines [40 CFR 60.443(g)].
- g. Startups and shutdowns are normal operation for this source category. Emissions from these operations are to be included when determining if the standard specified at §60.442(a)(2) is being attained [40 CFR 60.443(j)].
- h. To determine compliance with the emission limits in Condition 7.1.6(a), emissions from the affected coating lines shall be calculated based on the following emission formula:

$$\text{VOM emissions} = (\text{VOM usage, tons}) \times (1 - \text{overall control efficiency of the control devices, percent}/100)$$

7.2 Unit: Boilers (SB-1, SB-2)
 Control:

7.2.1 Description

The plant has two 25.2 mmBtu/hr steam boilers, which supply all of the steam used in the process and in the winter, provide heat.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
SB-1 and SB-2	Two 25.2 mmBtu/hr Natural Gas-Fired Kewanee Boilers	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit-specific conditions, is each boiler as described in conditions 7.2.1 and 7.2.2.
- b. The affected boilers are subject to the NSPS for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because the construction, modification, or reconstruction is commenced after June 9, 1989 and has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.
- c. 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 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- d. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input

greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.2.4 Non-Applicability of Regulations of Concern

- a. Each affected boiler is not subject to 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).
- b. The provisions of 35 IAC 215.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 215.303].

7.2.5 Operational And Production Limits And Work Practices

- a. Natural gas shall be the only fuel fired in the affected boilers.
- b. Natural gas usage by the affected boilers shall not exceed 20 mmscf/month and 197 mmscf/year.

7.2.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected boiler to demonstrate compliance with conditions 5.5.1, 7.2.5 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee of each affected boiler shall record and maintain records of the amount of fuel combusted during each day [40 CFR 60.48c(g)].

This record shall be maintained by Permittee of the affected boiler for a period of two years following the date of such record [40 CFR 60.48c(i)].

- b. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected boilers shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected boilers with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Conditions 7.2.3(c) and 7.2.3(d) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected boilers.
- b. To determine compliance with the emission limits in Condition 5.5.1, emissions from the affected boilers shall be calculated based on the following emission factors:

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<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/Mft³)</u>
CO	84
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, March, 1998.

Boiler Emissions (ton) = [(Natural Gas Consumed, mmscf) x (The Appropriate Emission Factor, lb/mmscf)]/(2000 lb/ton)

7.3 Unit: Air Stripper
 Control: SRS

7.3.1 Description

The air stripper is used to remove VOM from the wastewater discharged from the SRS.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Air Stripper	Decant Water Air Stripper	SRS

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected air stripper" for the purpose of these unit-specific conditions, is an air stripper as described in conditions 7.3.1 and 7.3.2.
- b. The affected air stripper is subject to the emission limits identified in Condition 5.2.2.
- c. The affected air stripper is subject to 35 IAC 215 Subpart G, Use of Organic Material, which provides that:
 - i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.3.3(d)(ii) (see also 35 IAC 215.302) and the following exception: If no odor nuisance exists the limitation of this Condition shall apply only to photochemically reactive material [35 IAC 215.301].
 - ii. Emissions of organic material in excess of those permitted by Condition 7.3.3(d)(i) (see also 35 IAC 215.301) are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert

85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)].

7.3.4 Non-Applicability of Regulations of Concern

None

7.3.5 Operational And Production Limits And Work Practices

None

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected air stripper to demonstrate compliance with condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Maximum groundwater pumping rate (gallons/minute);
- b. Hours of operation (hours/year);
- c. Maximum VOM and HAP concentration (mg/l); and
- d. VOM and HAP emissions (tons/month and tons/year).

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected air stripper with the permit requirements as follows, pursuant

to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

None

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

To determine compliance with the emission limits in Conditions 5.5.1 and 7.3.3(c), emissions from the affected air stripper shall be calculated based on the following emission formulas:

$$\text{Air Stripper Emissions (ton)} = [(\text{Groundwater pumping rate, gal/minute}) \times (\text{Pollutant concentration, mg/l}) \times (1 \text{ lb}/453592.37 \text{ mg}) \times (3.785 \text{ l/gal}) \times (60 \text{ minutes/hr}) \times (1 - 95.1/100)]$$

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ **{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as

not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result

of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

FINAL DRAFT CAAPP PERMIT
Central Products Company
I.D. No.: 077015ABX
Application No.: 95090099
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i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or

denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance

was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

FINAL DRAFT CAAPP PERMIT
Central Products Company
I.D. No.: 077015ABX
Application No.: 95090099
January 3, 2000

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

JMS:jar