

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	
)	
White Cap, Inc.)	
Chicago, Illinois)	MODIFICATION OF
)	ADMINISTRATIVE ORDER
Proceeding Pursuant to)	BY CONSENT
Sections 113(a) and 114)	EPA-5-96-IL-1
of the Clean Air Act,)	
42 U.S.C. §§ and 7414.)	
_____)	

STATUTORY AUTHORITY

This Consent Order was previously issued pursuant to Section 113(a) and 114(a) of the Clean Air Act (Act), 42 U.S.C. §§ 7413(a)(3)(B) and 7414(a). The Order contained compliance provisions and reporting requirements. The Order is hereby modified as follows:

REGULATORY BACKGROUND

1. The regulatory background set forth in the Administrative Order by Consent EPA-5-96-IL-1 (“Administrative Order by Consent”) remains the same and is incorporated herein.

FINDINGS

2. Paragraphs 5 through 19 of the Administrative Order by Consent remain the same and are incorporated herein.
3. As set forth in the Administrative Order by Consent, White Cap previously operated twelve coating lines, none of which were permanently totally enclosed. White Cap has replaced six of its existing lines with three new permanently totally enclosed lines. White Cap will perform capture efficiency testing on any remaining lines which are not permanently totally enclosed in accordance with this Order.
4. Nothing in this Order shall prevent White Cap from demonstrating compliance with the Illinois State Implementation Plan (“SIP”) at Title 35, Part 218, by means of the Alternative Emissions Limitations set forth at Section 218.207 of Part 218 of the Illinois SIP, provided that White Cap has successfully demonstrated capture efficiency on the line(s) in question pursuant to the test methods set forth at Section 218.105(c) of Part 218 of the Illinois SIP or pursuant to USEPA’s Memorandum on Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions issued on February 7, 1995, by John S. Seitz, Office of Air Quality Planning and Standards and the Guidance document attached to that memorandum, in accordance with Paragraph 6.B. of this Order

or by means of the removal of the existing non-permanently totally enclosed coating lines. In the event that White Cap changes its method of compliance, White Cap shall notify USEPA prior to the change.

THEREFORE IT IS HEREBY ORDERED THAT:

5. White Cap shall provide within 30 days of the end of each calendar quarter, beginning January 1, 1999, the following information:
 - A. All dates and times during the quarter in question when any printing and coating lines above did not operate with the benefit of the respective catalytic afterburner or regenerative thermal oxidizer, and/or associated monitoring equipment, and why;
 - B. Details of all routine and nonroutine maintenance and upgrades during the quarter in question performed on each catalytic afterburner and associated monitoring equipment, including dates and duration of any outages; and
 - C. Details of all removal and replacement of each non-permanently totally enclosed coating line, including dates of cessation of each line.

6. White Cap shall test all its subject catalytic afterburners at its facility at 1819 North Major Avenue for compliance with the destruction efficiency requirements of the Illinois SIP and shall conduct capture efficiency tests on any coating line which is not permanently totally enclosed, and report such results to USEPA and the Illinois Environmental Protection Agency (IEPA). The following criteria shall be met:
 - A. Destruction efficiency testing shall be performed pursuant to USEPA Reference Methods 1 through 4, and 18, 25, or 25A, whichever is appropriate for each line;
 - B. Capture efficiency testing shall be performed pursuant to USEPA's Memorandum on Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions issued on February 7, 1995, by John S. Seitz, Office of Air Quality Planning and Standards and the Guidance Document Attached to that Memorandum. White Cap shall comply by the first of the following two dates: 1) within sixty days of issuance of a final, effective Illinois Clean Air Act Permit Program ("CAAPP") permit which provides for capture efficiency testing in accordance with USEPA's Memorandum on Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions issued on February 7, 1995, by John S. Seitz, Office of Air Quality Planning and Standards ("Guidance Memorandum") or 2) if the Illinois SIP is subsequently modified to incorporate the changes set forth in the Guidance Memorandum, within 90 days of approval by USEPA and incorporation of

these changes into the Illinois SIP, but in any event no later than December 31, 1999.

- C. White Cap shall provide to USEPA and IEPA, at least 15 days prior to each capture or destruction efficiency test, a copy of the test protocol to be used to conduct the test. USEPA reserves the right to require changes to a test protocol and must submit such changes to White Cap within 5 days of receipt of a test protocol.
- D. Repairs to the afterburners (other than routine maintenance) may not be made within 90 days in advance of the testing required above.
- E. The subsequent test report for each afterburner shall include, at a minimum, the emission results with example calculations, process and control equipment data related to determination of compliance, representativeness of process parameters and collected materials and shall be submitted within 90 days of issuance of a final, effective CAAPP permit.

GENERAL PROVISIONS

- 7. White Cap shall submit to USEPA and to IEPA all reports and information required by this Order to:

Brent Marable, Chief
Air Enforcement and Compliance Assurance Section (IL/IN)
Air Enforcement and Compliance Assurance Branch
U.S. EPA (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

with a copy to:

Mel Villalobos, Manager
Region I
Illinois Environmental Protection Agency
1701 First Avenue - Suite 600
Maywood, Illinois 60153

- 8. Paragraphs 25 through 31 of the Administrative Order by Consent are incorporated herein.

9. This Order is effective on the date of signature by the Acting Director of the Air and Radiation Division. This Order will expire 90 days after the issuance of a final, effective CAAPP permit provided that all terms of the Order have been met.

12/10/98
Date


Stephen Rothblatt, Acting Director
Air and Radiation Division

12-1-98
Date


Ralph Fasano
Manager of Environmental Affairs
White Cap, Inc.

CERTIFICATE OF MAILING

I, Betty Williams, do hereby certify that a Final Administrative Order was sent by Certified Mail, Return Receipt Requested, to:

Ralph Fasano, Manager of Environmental Affairs
White Cap, Inc.
1819 North Major Avenue
Chicago, Illinois 60639

I also certify that a copy of the Final Administrative Order was sent by first class mail to:

David Kolaz, Manager
Compliance and Systems Management Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

Mel Villalobos, Regional Manager
Illinois Environmental Protection Agency
1701 South First Avenue - Suite 600
Maywood, Illinois 60153

on the 11th day of December 1998.


Betty Williams, Secretary
AECAS (IL/IN)

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CERTIFIED MAIL NUMBER