BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE
MAY - 5 1997
STATE OF ILLINOIS
POLLUTION CONTROL BOARD

In the Matter of:

W.R. MEADOWS, INC.,
Petitioner,

v.

THE ILLINOIS
ENVIRONMENTAL
PROTECTION AGENCY,
Respondent.

PCB 97-195

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached Petition for Review of Permit Denial and Entries of Appearance by mailing same via regular, first class mail, postage prepaid, upon the following persons:

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph, Suite 11-500
Chicago, Illinois 60601

Division of Legal Counsel
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

Richard F. Bulger
Assistant Counsel
Division of Legal Counsel
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

Diana M. Jagiella

Dated: May 2, 1997

Jon S. Faletto
Diana M. Jagiella
Howard & Howard Attorneys, P.C.
321 Liberty Street, Suite 200
Peoria, IL 61602
(309) 672-1483

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THIS FILING IS SUBMITTED ON RECYCLED PAPER.

ORIGINAL

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Established 1869

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MYRA L. WILLIS
JOHN E. YOUNG
MARLA G. ZWAS

WILLIAM G. HOWARD
(1846-1906)
HARRY C. HOWARD
(1871-1946)
WILLIAM J. HOWARD
(1904-1993)

ALL ATTORNEYS ADMITTED IN MICHIGAN ONLY, EXCEPT AS INDICATED.
☆ ALSO ADMITTED IN DISTRICT OF COLUMBIA
✻ ALSO ADMITTED IN FLORIDA
⋆ ALSO ADMITTED IN ILLINOIS
‡ ALSO ADMITTED IN INDIANA
◆ ALSO ADMITTED IN IOWA
⊛ ALSO ADMITTED IN MINNESOTA
◗ ALSO ADMITTED IN MISSOURI
△ ALSO ADMITTED IN NEW JERSEY
$ ALSO ADMITTED IN NEW YORK
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± ALSO ADMITTED IN PENNSYLVANIA
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≠ ALSO ADMITTED IN WEST VIRGINIA
× ONLY ADMITTED IN FLORIDA
▲ ONLY ADMITTED IN ILLINOIS
□ ADMITTED TO PRACTICE BEFORE THE PATENT AND TRADEMARK OFFICE

Peoria Office
May 2, 1997

PCB 97-85

Ms. Dorothy M. Gunn
Illinois Pollution Control Board
100 West Randolph, Suite 11-500
Chicago, Illinois 60601

Re: W.R. Meadows' Petition for Review of Permit Denial

Dear Ms. Gunn:

Enclosed for filing is an original and ten copies of a Petition for Review of Permit Denial and Entries of Appearance in the above matter. We have also filed an original with the Illinois Environmental Protection Agency. Also enclosed for filing is the Notice of Filing and the $75.00 filing fee.

Sincerely,

HOWARD & HOWARD

Diana Jagiella

Diana M. Jagiella

Enclosures
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Petitioner,	)	
v.	)	PCB 97-195
	)	
THE ILLINOIS	)	
ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
Respondent.	)	

NOTICE OF FILING

TO:

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph, Suite 11-500
Chicago, Illinois 60601

Richard Bulger
Division of Legal Counsel
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

Division of Legal Counsel
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board a Petition for Review of Permit Denial and Entries of Appearance, copies of which are herewith served upon you.

Diana M. Jagiella

Dated: May 2, 1997

Jon S. Faletto
Diana M. Jagiella
Howard & Howard Attorneys, P.C.
321 Liberty Street, Suite 200
Peoria, IL 61602
(309) 672-1483

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Petitioner,	)	PCB 97-195
v.	)	
	)	
THE ILLINOIS	)	
ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
Respondent.	)	

ENTRY OF APPEARANCE

NOW COME Diana M. Jagiella and Jon S. Faletto of the law firm of HOWARD & HOWARD ATTORNEYS, P.C., and hereby enter their appearances on behalf of the Petitioner, W. R. MEADOWS, INC.

Respectfully submitted,

By: Diana M. Jagiella
Diana M. Jagiella

Dated: May 2, 1997

Jon S. Faletto
Diana M. Jagiella
Howard & Howard Attorneys, P.C.
321 Liberty Street, Suite 200
Peoria, IL 61602
(309) 672-1483

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v.	)	PCB 97-195
	)	
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ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
Respondent.	)	

ENTRY OF APPEARANCE

NOW COME Diana M. Jagiella and Jon S. Faletto of the law firm of HOWARD & HOWARD ATTORNEYS, P.C., and hereby enter their appearances on behalf of the Petitioner, W. R. MEADOWS, INC.

Respectfully submitted,

By: Jon Faletto
Jon S. Faletto

Dated: May 2, 1997

Jon S. Faletto
Diana M. Jagiella
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321 Liberty Street, Suite 200
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POLLUTION CONTROL BOARD

In the Matter of:	)	
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	)	
W.R. MEADOWS, INC.,	)	
	)	PCB No. 97-195
Petitioner,	)	
	)	(Permit Appeal)
v.	)	
	)	
THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
	)	
Respondent.	)	

PETITION FOR REVIEW OF PERMIT DENIAL

NOW COMES Petitioner, W.R. MEADOWS, INC., ("Meadows") by its attorneys, Howard & Howard Attorneys, P.C., and, pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act ("Act") (415 ILCS 5/40(a)(1)) and 35 Ill. Admin. Code 105.102(a), hereby requests a hearing and review of the final decision by the Respondent, Illinois Environmental Protection Agency ("IEPA"), denying Meadows application for a Joint Construction and Operating Air Permit for its Hampshire, Illinois facility. In support of its Petition, Meadows states as follows:

1. The Hampshire facility is currently subject to Air Construction Permit Number 95120221 (Permit No. 95120221) issued to Meadows by IEPA on February 22, 1996. Permit No. 95120221 contains material usage restriction and emission requirements which limit production. To address emissions associated with increased production, Meadows sought a new Air Permit pursuant to Section 39 of the Act (415 ILCS 5/39) and

35 Ill. Admin. Code §203.211 for IEPA approval to install new emissions control equipment.

2. Meadows manufactures and distributes construction materials such as fiber expansion joint material, concrete curing compounds and concrete release agents. Meadows manufactures asphalt-saturated fiber expansion joint material in Georgia, Arizona and in Hampshire, Kane County, Illinois ("Hampshire Facility"). The asphalt saturated fiber expansion joint material manufacturing operations at the Hampshire Facility are at issue in this proceeding.

3. The asphalt-saturated fiber expansion joint material manufactured by Meadows, commonly known as "fiber expansion joint," is composed of cellulose fiberboard which has been impregnated with an asphalt/mineral spirits blend to achieve a uniform distribution of asphalt within the fiberboard. The asphalt provides the moisture and rot resistance for the fiberboard which allows the asphalt joint material to be used as expansion joints in poured concrete and similar applications. Without complete and sufficient asphalt distribution within the fiberboard, moisture, heat and adverse weather conditions will cause the fiberboard to deteriorate and decompose.

4. The fiber expansion joint manufactured and sold by Meadows must meet specifications established by the American Society for Testing and Materials ("ASTM") because the material is used in construction of roads, bridges, major structures and other projects. Design and material specifications for these types of projects require ASTM-compliant materials or the material will be rejected as noncompliant. The applicable standard is known as ASTMD-1751. Properties required to comply with this standard

include compression, extrusion (in inches), percent recovery, density, water absorption and asphalt content.

5. Meadows utilizes a proprietary manufacturing process to insure that the fiber expansion joint complies with all requirements of the ASTM standard. At the Hampshire facility, the manufacturing process consists of the operations described below to insure compliance with the ASTM standards:

a. Above ground storage tanks are utilized for storage and blending of asphalt and mineral spirits. The volatile organic material (VOM) content of the asphalt/mineral spirits blend is approximately 3.0 pounds per gallon (lbs/gallon).

b. The blended asphalt and mineral spirits are then utilized in the dip tank to saturate the fiberboard. The covered dip tank is approximately 70 feet long and has a capacity of approximately 3,300 gallons. Raw (unsaturated) fiberboards of varying lengths and thicknesses are manually fed into the dip tank at an approximate rate of one board every 15 seconds. The fiberboards are carried through the asphalt/mineral spirits blend via a conveyor.

c. After exiting the dip tank, the saturated boards are stacked in pallets manually, one board directly on top of another, typically 80 boards per pallet. After having metal banding attached, the pallet of saturated fiberboards is placed outdoors for an average period of four weeks to allow complete penetration of asphalt throughout the thickness of the board. The outdoor fiberboard curing area at Meadows' Hampshire facility is approximately two acres in size.

d. When dried, some of the saturated boards are cut into varying sizes based on end use. A portion of the saturated boards are also sold as sheet stock.

6. During the manufacturing process, VOM is emitted from the asphalt dip tank unit. Maximum uncontrolled VOM emissions from the asphalt dip-tank saturator unit at peak production rates are approximately 12 tons per month. Fugitive VOM emissions also occur from the saturated fiberboard curing area, as the saturant wicks through the fiber material during an approximate four week period. At the maximum production rate, these fugitive emissions are approximately 35 tons per month.

7. Historically, Meadows' operations at the Hampshire facility were governed by Joint Construction and Operating Permit Number 87120005 (Permit No. 87120005) issued to Meadows on February 23, 1988, and renewed on November 1989. The following pertinent limitations were imposed by Permit Number 87120005:

a. The saturating operation shall consume no more than 1,690 tons of volatile organic material solvents per year; and

b. Emissions of volatile organic material directly from the operation of the dip tank shall not exceed 10 pounds/hour and 10.8 tons/year. This limit does not include an estimated 27.6 tons/year of fugitive emissions. (See Exhibit 1)

8. In 1992, after receiving IEPA approval, Meadows dismantled the equipment and reconstructed the same equipment at its Austell, Georgia property. On February 3, 1992, IEPA approved Meadows' withdrawal of Permit No. 87120005.

9. On December 1, 1995, Meadows submitted a new permit application for installation and construction of equipment at the Hampshire facility to produce asphalt saturated fiber expansion joint material. The new equipment and proposed manufacturing process planned at the Hampshire facility for which permitting was requested, was virtually identical to the previously permitted equipment. At the time the permit application was submitted, Meadows planned to operate the Hampshire facility on a limited basis to process specialty size fiber expansion joint material. At that time, the majority of fiberboard expansion joint material sold by Meadows was manufactured by the Celotex Corporation (Meadows exclusive supplier of bulk saturated fiberboard) and then cut to size by Meadows to meet customer specifications for construction grade expansion joints.

10. On February 22, 1996, Meadows was issued Construction Permit Number 95120221 (Permit No. 95120221) authorizing installation and construction of equipment at the Hampshire facility to manufacture fiber expansion joint material for use in the construction industry.

11. The material usage restrictions imposed in the construction permit were consistent with the limited manufacturing operations originally planned for the Hampshire facility. The issued permit included restrictions on the use of raw materials to maintain emissions of volatile organic material below 20.5 tons per year. The material usage restrictions limited the amount of the raw fiberboard and the asphalt/mineral spirits blend that could be used in the asphalt dip tank saturation process. The material usage and VOM emission limitations qualified the Hampshire facility for treatment as a non-major

smaller source pursuant to 35 Ill. Admin. Co. §201.180-201.187 of the Air Pollution Control Regulations. (See Exhibit 2)

12. In March 1996, Celotex experienced a catastrophic fire at the facility where it manufactured asphalt saturated fiberboard. Since the fire, Celotex has not restarted its saturation manufacturing process and has not been able to provide the bulk saturated fiberboard required to meet Meadows' specifications for use of construction grade fiber expansion joints. Since the date of the fire, Meadows has been unable to find other outside manufacturers of bulk saturated fiberboard expansion joint material that are capable of meeting its immediate need for product.

13. After learning of the Celotex fire and finding itself unable to find an alternate supplier, Meadows sought IEPA's assistance in solving its production crisis. These efforts have been described to the Board in detail in Docket PCB 97-58. Pursuant to 35 Ill. Admin. Code §101.106, Meadows will file a Motion to incorporate the information from that proceeding into this permit appeal. For this reason, Meadows will not repeat this history here.

14. In a final effort to resolve the production crisis, on December 21, 1996, Meadows submitted an application for a Joint Construction and Operating Permit (Permit Application) to IEPA. (See Exhibit 3) This application was submitted based on IEPA's representations in PCB 97-58 that a Permit application was the appropriate means to resolve the production crisis; i.e. reduce VOM emissions from the saturation process to offset the increased production rate.

15. The Permit Application sought an air permit pursuant to Section 39 of the Act (415 ILCS 5/39). The Permit Application requested permitting of the Hampshire Facility as a minor source based on 35 Ill. Admin. Code §203.211.

16. The application requested authorization to install pollution control equipment on the dip tank fiber saturation unit. Specifically, Meadows proposed to install a condenser to control point source emissions from the dip tank fiber saturation unit. With controls, Meadows would be able to increase production, and VOM emissions from the dip tank saturator unit would remain below the 25 ton major source threshold.

17. With respect to emissions from the curing area, Meadows explained in the Permit application that these emissions were fugitive and under 35 Ill. Admin. Code §203.211 should not be considered in the determination of Meadows' source status.

18. On January 13, 1997, the IEPA determined the application was incomplete and requested the following additional information:

a. Clarification of the controlled emission rate;

b. Clarification of the amount of fugitive emissions;

c. Clarification of how VOM emissions could be controlled given maximum emission rates times maximum hours;

d. An explanation of how water in the separator would be kept from freezing;

e. An explanation of how the system would be monitored; and

f. Clarification of the number of storage tanks used in the operation.

(See Exhibit 4)

19. On February 4, 1997, Meadows responded to IEPA's request for this additional information. (See Exhibit 5)

20. On March 31, 1997, IEPA denied Meadows Permit application. The March 31, 1997 denial letter specifies the following reasons for the denial:

a. The Illinois EPA does not classify the emissions from curing as fugitive emissions. In Particular, W.R. Meadows did not show that some or all of these emissions do not or could not reasonably pass through a chimney, vent, or equivalent opening.

b. Even if they are classified as fugitive, 35 Ill. Admin. Code 203.206(c) states that in severe nonattainment areas, fugitive emissions shall be included in determining whether it is a major stationary source or major modification. As a result, the board coating line would be a major source even if the proposed condenser provided 100% control of the saturation step. Hampshire is located in a severe nonattainment area.

c. The application does not show that 35 Ill. Admin. Code 218 Subpart PP would not be violated. . . . If compliance with the 3.5 pound/gallon limit of Section 218.926 (b)(1) is to be shown, a USEPA Method 24 test will have to be performed on the asphalt/mineral spirits mixture as applied in accordance with 35 Ill. Admin. Code 218.105 and the results submitted with the application. (See Exhibit 6)

21. Based on its determinations outlined above regarding the curing area emissions, IEPA concluded that Meadows would be subject to major source requirements.

22. The bases upon which IEPA denied the Permit Application are erroneous and contrary to Illinois law and regulations. Under Illinois law and regulations Meadows is not a major source of air pollution and should not be subject, through the permitting process or otherwise, to the requirements applicable to major sources. Specifically:

a. IEPA's refusal to classify the curing area emissions as fugitive is contrary to its own prior permit determinations. IEPA previously determined that these emissions are fugitive as documented by Permit No. 87120005. A review of the permit application materials and the permit itself demonstrates that the raw materials, equipment and the manufacturing process previously permitted under Permit No. 87120005 are identical to the raw materials, equipment and manufacturing process currently employed at Meadows' Hampshire facility. Moreover, Meadows made this information available to the IEPA in the instant permit proceeding. Having previously determined that these emissions are fugitive, IEPA should not now be permitted to deny Meadows a permit based on a contrary determination. (See Exhibit 7)

b. IEPA's about face on the fugitive emissions is also contrary to Illinois law and the Board's regulations. Under 35 Ill. Admin. Code §203.124, fugitive emissions are defined as those emissions which could not reasonable pass through a stack, chimney, vent or other equivalent opening. In Environmental Protection Agency v. Pollution Control Board, 86 Ill. 2d 390 (1981), the Illinois Supreme Court held that emissions that cannot be readily collected and treated are fugitive in nature. Meadows has amply demonstrated to IEPA that emissions from

the two acre curing area cannot be readily collected, treated, or pass through a chimney or vent. (See Exhibit 8)

23. IEPA's contention that 35 Ill. Admin. Code §206(e) requires inclusion of the curing area emissions in the determination of a source's permitting status, even if such emissions are fugitive, is also erroneous and contrary to Illinois law. 35 Ill. Admin. Code §203.211 provides that the requirement for inclusion of fugitive emissions in calculating source status does not apply to sources outside of specified categories, where these emissions are the sole reason the source would be classified as major. Because §203.211 is a more specific rule than §203.206, its provisions control and must be followed by IEPA. People ex. rel. Fore v. Missouri Pacific R.R., 342 Ill. 226. Furthermore, since §203.211 was an existing regulation when §203.206 was amended (to include fugitive emissions for sources not in one of the 28 listed categories), it is presumed that the Board intended to maintain the exclusion from major source status provided by §203.211.

24. Finally, IEPA's contention that Meadows application failed to demonstrate compliance with 35 Ill. Admin. Code 218 Subpart PP is without merit. First, Meadows previously demonstrated compliance with Subpart PP. Second, although IEPA requested other data from Meadows in its January 13, 1997 letter, it never challenged Meadows contention that its operation complied with Subpart PP. Lastly, such a requirement should be a permit condition, not a speculative basis upon which a permit is denied, particularly since Meadows can demonstrate full compliance with the Subpart PP standards.

WHEREFORE, Meadows specifically requests that the Board reverse the IEPA's March 31, 1997 Permit Application denial and direct IEPA to issue a Permit consistent with Meadows' request.

Jon S. Faletto

Jon S. Faletto
Diana M. Jagiella
Howard & Howard Attorneys, P.C.
321 Liberty Street, Suite 200
Peoria, IL 61602
(309) 672-1483
I:\326\meadows\petition.rev

Exhibit 1

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-2113

JOINT CONSTRUCTION AND OPERATING PERMIT

PERMITTEE

W.R. Meadows, Inc.
Attention: Henry A. Cobo
Allen Road
Hampshire, Illinois 60140

Application No.: 87120005
Applicant's Designation:
Subject: Asphalt Saturation of Fiber Board
Date Issued: February 23, 1988

I.D. No.: 089045AAL
Date Received: December 1, 1987
Operating Permit Expiration Date: January 31, 1990

Location: Allen Road, Hampshire

Permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission source(s) and/or air pollution control equipment consisting of dip tank saturator and pallet storage as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. i. The dip tank shall operate, that is, actually process sheets, for no more than 2160 hours/year.

ii. The saturating operation shall consume no more than 1,690 tons of volatile organic material solvent, i.e. mineral spirits, per year.

iii. Compliance with these limits shall be determined from a running total of 12 months of data.

b. i. Emissions of volatile organic material directly from the operation of the dip tank, shall not exceed 10 lb/hour, and 10.8 tons/year.

ii. This limit does not include an estimated 27.6 tons/year of fugitive emissions. The estimate of fugitive emissions is based on detailed information on loss of volatile organic material during outside storage and drying, and the maximum operating rate and operating hours of the dip tank provided in the permit application.

iii. This permit is issued based upon a minimal hourly emission rate and negligible annual emissions (less than 0.1 ton/year) of volatile organic material from emission points, not accounted for above.

c. The terms of the above conditions may be superseded by new or revised conditions in future construction or operating permits upon a determination by the Agency that the new or revised conditions provide equivalent limits on emissions of volatile organic material.

2a. The Permittee shall maintain records of operating hours and volatile organic material solvent use, on at least a monthly basis.

b. The Permittee shall maintain normal operating records related to the volatile organic material content of asphalt board.

c. These records shall be retained for at least 2 years and shall be available for inspection by the Agency.

3a. Prior to April 1, 1989, the Permittee shall submit an analysis of the distribution of volatile organic material losses from the various steps in this operation, using material balance, laboratory analysis and other methods.

b. At the written request of the Agency the Permittee shall

i. Propose methods for further measurement of emissions from particular steps in this operation, for approval by the Agency, and

ii. Conduct measurements in accordance with the method approved by the Agency.

4. This permit is issued upon this operation not constituting a major new source or major modification for emissions of volatile organic material, so that it not subject to 35 Ill. Adm. Code Part 203, Subpart C.

It should be noted that the Illinois Pollution Control Board is presently considering a new regulation for "generic sources" of volatile organic material, R86-18. The present proposal would apply to certain emission sources at plants with 100 tons/year of volatile organic material emission in the absence of air pollution control equipment, not yet subject to limits which reflect Reasonable Available Control Technology. In the event a rule is adopted to which this equipment is subject, it will be necesary to comply with its requirements in the manner and schedule specified by the rule.

Terry A. Sweitzer, P.E.
Manager, Permit Section
Division of Air Pollution Control

TAS:DMH:ds:4636H/1-2

cc: Region 1

Exhibit 2

Mary A. Gade, Director
217/782-2113

P. O. Box 19506, Springfield, IL 62794-9506

CONSTRUCTION PERMIT

PERMITTEE

W. R. Meadows, Inc.
Attn: David Carey, CHMM
46W185 Allen Road
Hampshire, Illinois 60140

Application No.: 95120221
Applicant's Designation: 006
Subject: Dip Tank Fibre Saturation Unit
Date Issued: February 22, 1996
Location: 46W185 Allen Road, Hampshire

I.D. No.: 089045AAL
Date Received: December 1, 1995

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of mineral spirits storage tank, asphalt storage tank, blend storage tank, covered dip tank and storage area for drying of saturated boards as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. This permit is issued based on negligible emissions of volatile organic material (VOM) from each of the three storage tanks and the dip tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year. Vapor pressure of the material stored in any of the storage tanks shall not exceed 0.1 psia at storage temperature. The dip tank shall be closed except for slotted openings at feed and discharge. Temperature in the tank shall not exceed 140°F.

2a. Usages of raw materials shall not exceed the following:

Material	Usage Rate (Ton/Mo)	(Ton/Yr)
Asphalt	160	800
Mineral Spirits	170	850
Fibre Board	300	1500

b. Emissions of VOM, as determined by a material balance, shall not exceed 4.0 tons/month and 20.5 tons/year. Compliance with annual limits shall be determined from a running total of 12 months of data, provided that for the first 12 months following the initial effectiveness of the limits, the limits shall be prorated. For example, the limits after 2 months, shall be 2/12 of the annual limits. Note exception pursuant to Condition 5.

3. Within ten days of initial startup the Permittee shall begin a test to determine emissions from the product during post-production storage using a material balance. The test shall consist of three loads of product from the dip tank, minimum of 3,000 pounds per load. These loads shall be weighed immediately after enough material for a load is available and weekly intervals for four weeks

JUN 05 '96 10:56AM W.R.MEADOWS INC P.2

6. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

It should be noted that the emission limits in this construction permit may be sufficient to require the Permittee to obtain a Clean Air Act Permit.

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

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

DES:DGP:jar

cc: Region 1

Exhibit 3

W. R. MEADOWS, INC.

SEALTIGHT

P.O. BOX 543 • ELGIN, IL 60121

TELEPHONE: 847-683-4500
800-342-5976
FAX: 847-683-4544

December 21, 1996

Certified-Return Receipt Requested

Illinois Environmental Protection Agency
Division of Air Pollution Control, Permit Section
Attention: Mr. Don Sutton
2200 Churchill Road
Springfield, Illinois 62794-9506

Dear Mr. Sutton:

Attached please find a permit application for W. R. MEADOWS INC., 46W185 Allen Road, Hampshire, Illinois, 60140 (identification number 089045AAL). This application is being submitted for authorization to install pollution control equipment on the existing dip tank fibre saturation unit. This production equipment was previously granted a construction permit without controls on February 22, 1996 (application number 95120221).

There are (2) two sources of volatile organic material (VOM) emissions associated with the operation of this equipment. The first are point source emissions associated with the operation of the production equipment. W. R. MEADOWS believes that these emissions can be captured and controlled. The second source of emissions are from saturated boards which have gone through the saturation process. These boards are allowed to "cure" for a period of (4) four weeks prior to being shipped off-site. W. R. MEADOWS believes that emissions from the saturated boards meet the definition of fugitive emissions set forth at 203.124 which cannot reasonably be captured and controlled.

As you may be aware, W. R. MEADOWS submitted on September 17, 1996, extensive background information on the fugitive emissions at the Hampshire facility. That submittal requested a decision by IEPA on whether those emissions meet the regulatory definition of "fugitive emissions". Our request has never been answered. We have attached another copy of our September 17th submittal for your review.

If controls are placed on the fibre saturation unit, W. R. MEADOWS, Hampshire facility, would stay below the 25 ton major source threshold established by IEPA for VOM. If fugitive emissions from saturated boards are included, however, the Hampshire facility would exceed the 25 ton threshold. Because the threshold would be exceeded only because of fugitive emissions, W. R. MEADOWS feels that Section 203.211 found in Title 35, Subtitle B would apply to this facility as a non-major small source.

As you know, W. R. MEADOWS and IEPA have been discussing the circumstances surrounding the operation of this equipment and how emissions from the two (2) above-noted sources should be classified. Discussions were initiated by W. R. MEADOWS with IEPA in June, 1996. To date, none of the issues presented by W. R. MEADOWS have been resolved by IEPA.

W. R. MEADOWS ceased operation of this equipment in October 1996 and does not expect to initiate production again until April, 1997. It is W. R. MEADOWS intention to follow all applicable air pollution control regulations, however, MEADOWS must know what options are available for continued operation. It is hoped that the IEPA Permit Section will work with MEADOWS in determining what these options are.

W. R. MEADOWS would like to continue to work with IEPA in a cooperative fashion to solve this difficult situation. W. R. MEADOWS believes that installation of VOM control on the point sources would effectively resolve the outstanding issues, and request IEPA approval of the attached application for those pollution controls. Thank you for your assistance. If you have any questions or require additional information, please contact me at (847) 683-4500.

Sincerely,

Dave Carey

Dave Carey
CHMM, Environmental Specialist

DC/kjo

cc: Jim Stilling, W. R. MEADOWS, INC.
Jim Dwyer, W. R. MEADOWS, INC.
Harry Meadows, W. R. MEADOWS, INC.
Don Knapp, W. R. MEADOWS, INC.
Jon Faletto, Howard & Howard
Sal Falcone, Black & Veatch

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62794-9276

APPLICATION FOR PERMIT(A)	FOR AGENCY USE ONLY
[X] CONSTRUCT [X] OPERATE	I.D. NO.
NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED: Dip Tank Fibre Saturation Unit(B)	PERMIT NO.
	DATE

1a. NAME OF OWNER: W. R. MEADOWS INC.	2a. NAME OF OPERATOR: W. R. MEADOWS INC.
1b. STREET ADDRESS OF OWNER: 46W185 Allen Road	2b. STREET ADDRESS OF OPERATOR: 46W185 Allen Road
1c. CITY OF OWNER: Hampshire	2c. CITY OF OPERATOR: Hampshire
1d. STATE OF OWNER: Illinois; 1e. ZIP CODE: 60140	2d. STATE OF OPERATOR: Illinois; 2e. ZIP CODE: 60140

3a. NAME OF CORPORATE DIVISION OR PLANT: Hampshire Plant		3b. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Road		
3c. CITY OF EMISSION SOURCE: Hampshire	3d. LOCATED WITHIN CITY LIMITS: [X] YES [ ] NO	3e. TOWNSHIP: Hampshire	3f. COUNTY: Kane	3g. ZIP CODE: 60140

4. ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) Dave Carey, CHMM, Environmental Specialist	5. TELEPHONE NUMBER FOR AGENCY TO CALL: (847) 683-4500
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) [ ] OWNER [ ] OPERATOR [X] EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION:(C) 0 0 6

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S):(D)

BY [signature] SIGNATURE	12-10-96 DATE	BY SIGNATURE	DATE
David Carey TYPED OR PRINTED NAME OF SIGNER		TYPED OR PRINTED NAME OF SIGNER	
CHMM, Environmental Specialist TITLE OF SIGNER		TITLE OF SIGNER	

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY BE USED TO REQUEST A CONSTRUCTION PERMIT, AN OPERATING PERMIT, A CONSTRUCTION OR OPERATING PERMIT.

(B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.

C) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.

(D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.154 OR 201.159 WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE ONWER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

9. DOES THIS APPLICATION CONTAIN A PLOT PLAN/MAP:

[ ] YES [X] NO

IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY:

AGENCY I.D. NUMBER _____ APPLICATION NUMBER _____

IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN 1 ACRE?

[ ] YES [X] NO: SPECIFY 80 ACRES

10. DOES THIS APPLICATION CONTAIN A PROCESS FLOW DIAGRAM(S) THAT ACCURATELY AND CLEARLY REPRESENTS CURRENT PRACTICE.

[X] YES [ ] NO

11a. WAS ANY EQUIPMENT, COVERED THIS APPLICATION, OWNED OR CONTRACTED FOR, BY THE APPLICANT PRIOR TO APRIL 14, 1972:

[ ] YES [X] NO

IF "YES" ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:
(a) LISTS OR DESCRIBES THE EQUIPMENT
(b) STATES WHETHER THE EQUIPMENT WAS IN COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION PRIOR TO APRIL 4, 1972

11b. HAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, NOTPREVIOUSLY RECEIVED AN OPERATING PERMIT:

[ ] YES [X] NO

IF "YES", ATTACH AN ADDITIONAL SHEET, EXHIBIT B, THAT:
(a) LISTS OR DESCRIBES THE EQUIPMENT
(b) STATES WHETHER THE EQUIPMENT
(I) IS ORIGINAL OR ADDITIONAL EQUIPMENT
(II) REPLACES EXISTING EQUIPMENT, OR
(III) MODIFIES EXISTING EQUIPMENT
(c) PROVIDES THE ANTICIPATED OR ACTUAL DATES OF THE COMMENCEMENT OF CONSTRUCTION AND THE START-UP OF THE EQUIPMENT

12. IF THIS APPLICATION INCORPORATES BY REFERENCE A PREVIOUSLY GRANTED PERMIT(S), HAS FORM APC-210, "DATA AND INFORMATION—INCORPORATION BY REFERENCE" BEEN COMPLETED. Not Applicable

APPLICATION FOR OPERATING PERMIT ONLY

13. DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS APPLICATION PRODUCE AIR CONTAMINANT EMISSION IN EXCESS OF APPLICABLE STANDARDS:

[ ] YES [X] NO

IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN COMPLETED FOR THIS SOURCE.

[ ] YES [ ] NO

14. DOES THIS APPLICATION REQUEST PERMISSION TO OPREATE AN EMISSION SOURCE DURING MALFUNCTIONS OR BREAKDOWNS:

[ ] YES [X] NO

IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AND BREAKDOWN" BEEN COMPLETED FOR THIS SOURCE

[ ] YES [ ] NO

15. IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECT TO A FUTURE COMPLIANCE DATE:

[ ] YES [X] NO

IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT COMPLETION SCHEDULE," BEEN COMPLETED FOR THIS SOURCE:

[ ] YES [ ] NO

16. DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN EPISODE ACTION PLAN (REFER TO GUIDELINES FOR EPISODE ACTION PLANS):

[ ] YES [X] NO

17. LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMATION SUBMITTED AS PART OF THIS APPLICATION. INCLUDE THE PAGE NUMBERS OF EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECESSARY):

Cover letter, APC 220, APC 260, Facility Plot Plan

TOTAL NUMBER OF PAGES _____

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111½, Section 1039. Disclosure of this information is required under that section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center

*DATA AND INFORMATION AIR POLLUTION CONTROL EQUIPMENT	

*THIS INFORMATION FORM IS FOR AN INDIVIDUAL UNIT OF AIR POLLUTION CONTROL EQUIPMENT OR AN AIR POLLUTION CONTROL SYSTEM.

1. NAME OF OWNER: W. R. MEADOWS INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hampshire Plant
3. STREET ADDRESS OF CONTROL EQUIPMENT: 46W185 Allen Road	4. CITY OF CONTROL EQUIPMENT: Hampshire
5. NAME OF CONTROL EQUIPMENT OR CONTROL SYSTEM: Condensing Unit to control point source VOC emissions from the dip tank fibre saturation unit.	

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION.
2. COMPLETE THE APPROPRIATE SECTION FOR THE UNIT OF CONTROL EQUIPMENT, OR THE APPROPRIATE SECTIONS FOR THE CONTROL SYSTEM. BE CERTAIN THAT THE ARRANGEMENT OF VARIOUS UNITS IN A CONTROL SYSTEM IS MADE CLEAR IN THE PROCESS FLOW DIAGRAM.
3. COMPLETE PAGE 6 OF THIS FORM, EMISSION INFORMATION AND EXHAUST POINT INFORMATION.
4. EFFICIENCY VALUES SHOULD BE SUPPORTED WITH A DETAILED EXPLANATION OF THE METHOD OF CALCULATION, THE MANNER OF ESTIMATION, OR THE SOURCE OF INFORMATION. REFERENCE TO THIS FORM ANY RELEVANT INFORMATION OR EXPLANATION INCLUDED IN THIS PERMIT APPLICATION.
5. EFFICIENCY VALUES AND CERTAIN OTHER ITEMS OF INFORMATION ARE TO BE GIVEN FOR AVERAGE AND MAXIMUM OPERATION OF THE SOURCE EQUIPMENT. FOR EXAMPLE, "MAXIMUM EFFICIENCY" IS THE EFFICIENCY OF THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT MAXIMUM OPERATION, AND "AVERAGE FLOW RATE" IS THE FLOW RATE INTO THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT AVERAGE OPERATION.
6. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS", APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
MAXIMUM OPERATION - THE GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

ADSORPTION UNIT

1. FLOW DIAGRAM DESIGNATION(S) OF ADSORPTION UNIT: Condensing Unit

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. ADSORBENT:
☐ ACTIVATED CHARCOAL: TYPE _____ ☐ OTHER: SPECIFY _____

5. ADSORBATE(S):

6. NUMBER OF BEDS PER UNIT:

7. WEIGHT OF ADSORBENT PER BED: LB

8. DIMENSIONS OF BED:
THICKNESS _____ IN, SURFACE AREA _____ SQUARE IN

9. INLET GAS TEMPERATURE: °F

10. PRESSURE DROP ACROSS UNIT: INCH H_2O GAUGE

11. TYPE OF REGENERATION:
☐ REPLACEMENT ☐ STEAM ☐ OTHER: SPECIFY _____

12. METHOD OF REGENERATION:
☐ ALTERNATE USE OF _____ ENTIRE UNITS ☐ ALTERNATE USE OF _____ BEDS IN A SINGLE UNIT
☐ SOURCE SHUT DOWN ☐ OTHER: DESCRIBE

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
13. TIME ON LINE BEFORE REGENERATION: MIN/BED	15. TIME ON LINE BEFORE REGENERATION: MIN/BED
14. EFFICIENCY OF ADSORBER (SEE INSTRUCTION 4): %	16. EFFICIENCY OF ADSORBER (SEE INSTRUCTION 4): %

AFTERBURNER

1. FLOW DIAGRAM DESIGNATION(S) OF AFTERBURNER:

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. COMBUSTION CHAMBER DIMENSIONS:
LENGTH _____ IN, CROSS-SECTIONAL AREA _____ SQUARE IN.

5. INLET GAS TEMPERATURE: °F

6. OPERATING TEMPERATURE OF COMBUSTION CHAMBER: °F

7. FUEL:
☐ GAS ☐ OIL: SULFUR _____ WT%

8. BURNERS PER AFTERBURNER: @ BTU/HR EACH

9. CATALYST USED:
☐ NO ☐ YES: DESCRIBE CATALYST _____

10. HEAT EXCHANGER USED:
☐ NO ☐ YES: DESCRIBE HEAT EXCHANGER _____

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
11. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM
12. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %	14. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %

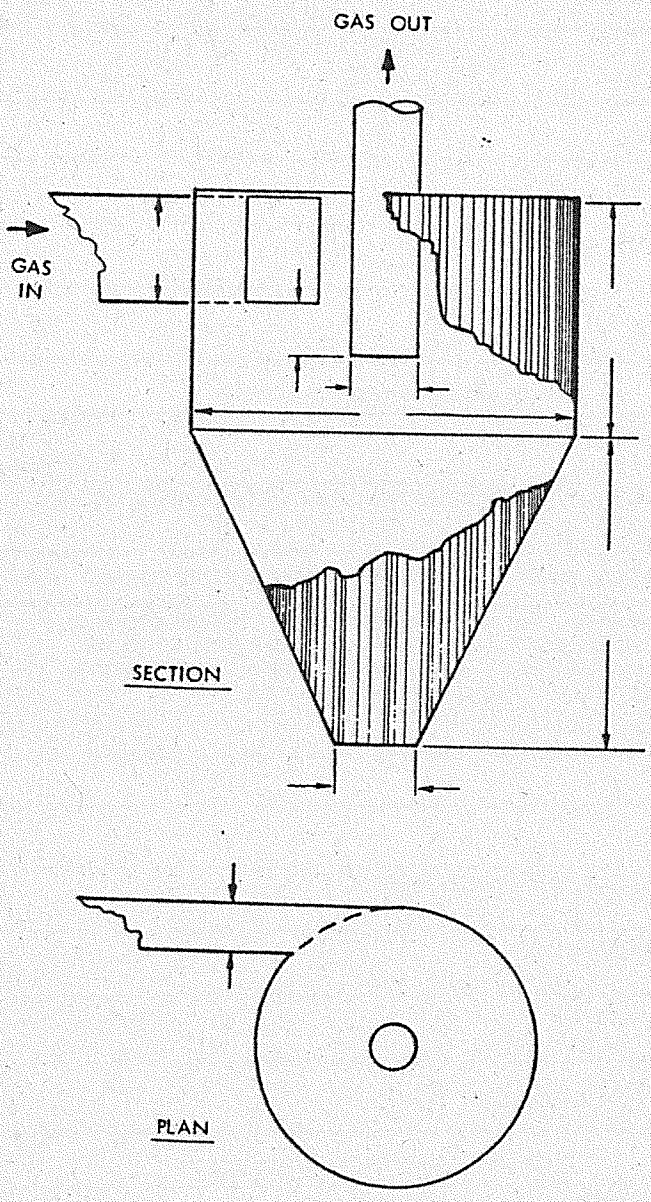
CYCLONE

1. FLOW DIAGRAM DESIGNATION(S) OF CYCLONE:

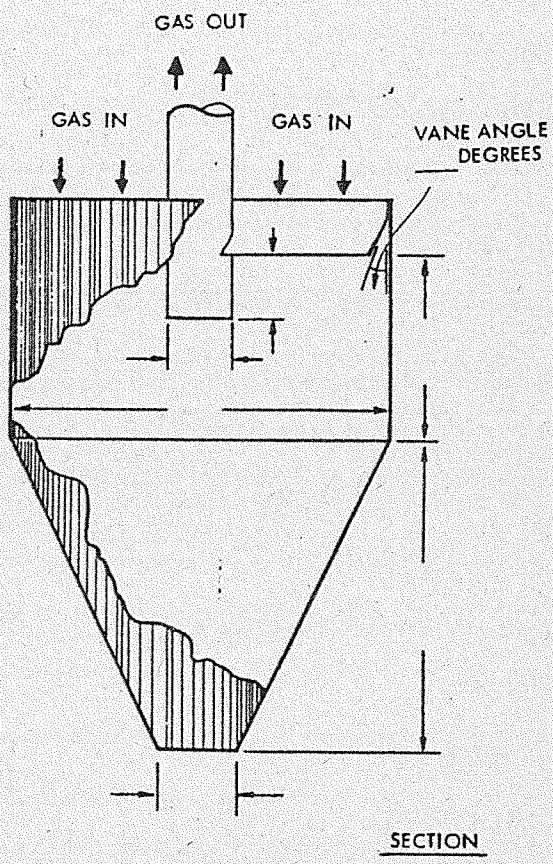
2. MANUFACTURER:	3. MODEL:
4. TYPE OF CYCLONE: ☐ SIMPLE ☐ MULTIPLE	5. NUMBER OF CYCLONES IN EACH MULTIPLE CYCLONE:

6. DIMENSION THE APPROPRIATE SKETCH (IN INCHES) OR PROVIDE A DRAWING WITH EQUIVALENT INFORMATION:

TANGENTIAL INLET CYCLONE



AXIAL INLET CYCLONE
(INDIVIDUAL CYCLONE OF MULTIPLE CYCLONE)



NOT TO SCALE

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
7. GAS FLOW RATE: SCFM	9. GAS FLOW RATE: SCFM
8. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %	10. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %

CONDENSER

1. FLOW DIAGRAM DESIGNATION(S) OF CONDENSER: Condensing Unit

2. MANUFACTURER:	3. MODEL NAME AND NUMBER:	4. HEAT EXCHANGE AREA:
To be determined	To be determined	2 at 15 Each. FT^2

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
5. COOLANT FLOW RATE PER CONDENSER: WATER N/A GPM AIR N/A SCFM; OTHER: TYPE R-22, FLOW RATE 3400 Lb./Hr.	10. COOLANT FLOW RATE PER CONDENSER: WATER N/A GPM AIR N/A SCFM; OTHER: TYPE R-22, FLOW RATE 3500 Lb./Hr.
6. GAS FLOW RATE: 4500 SCFM	11. GAS FLOW RATE: 4600 SCFM
7. COOLANT TEMPERATURE: INLET 2 °F OUTLET 29 °F; 8. GAS TEMPERATURE: INLET 140°F OUTLET 27°F	12. COOLANT TEMPERATURE: INLET 2 °F OUTLET 20 F; 13. GAS TEMPERATURE: INLET 140°F OUTLET 27 F
9. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): 85.5 Overall %	14. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): 85.5 Overall %

*ELECTRICAL PRECIPITATOR

1. FLOW DIAGRAM DESIGNATION OF ELECTRICAL PRECIPITATOR:

2. MANUFACTURER:	3. MODEL NAME AND NUMBER:

4. COLLECTING ELECTRODE AREA PER CONTROL DEVICE: FT^2

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
5. GAS FLOW RATE: SCFM	7. GAS FLOW RATE: SCFM
6. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %	8. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %

SUBMIT THE MANUFACTURER'S SPECIFICATIONS FOR THE ELECTRICAL PRECIPITATOR. REFERENCE THE INFORMATION TO THIS FORM.

*ELECTRICAL PRECIPITATORS VARY GREATLY IN THEIR DESIGN AND IN THEIR COMPLEXITY. THE ITEMS IN THIS SECTION PROVIDE A MINIMUM AMOUNT OF INFORMATION. THE APPLICANT MUST, HOWEVER, SUBMIT WITH THIS APPLICATION THE MANUFACTURER'S SPECIFICATIONS, INCLUDING ANY DRAWINGS, TECHNICAL DOCUMENTS, ETC. IF THE INFORMATION PROVIDED BY THE MANUFACTURER'S SPECIFICATIONS IS INSUFFICIENT FOR FULL AND ACCURATE ANALYSIS, THE AGENCY WILL REQUEST SPECIFIC ADDITIONAL INFORMATION.

FILTER UNIT

1. FLOW DIAGRAM DESIGNATION(S) OF FILTER UNIT:

2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. FILTERING MATERIAL:	5. FILTERING AREA:

6. CLEANING METHOD:
☐ SHAKER ☐ REVERSE AIR ☐ PULSE AIR ☐ PULSE JET ☐ OTHER: SPECIFY

7. GAS COOLING METHOD: ☐ DUCTWORK: LENGTH ____ FT., DIAM ____ IN.
☐ BLEED-IN AIR ☐ WATER SPRAY ☐ OTHER: SPECIFY

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. GAS FLOW RATE (FROM SOURCE): SCFM	12. GAS FLOW RATE (FROM SOURCE): SCFM
9. GAS COOLING FLOW RATE: BLEED-IN AIR ____ SCFM, WATER SPRAY ____ GPM	13. GAS COOLING FLOW RATE: BLEED-IN AIR ____ SCFM, WATER SPRAY ____ GPM
10. INLET GAS CONDITION: TEMPERATURE ____ °F DEWPOINT ____ °F	14. INLET GAS CONDITION: TEMPERATURE ____ °F DEWPOINT ____ °F
11. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4): %	15. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4): %

SCRUBBER

1. FLOW DIAGRAM DESIGNATION(S) OF SCRUBBER:

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. TYPE OF SCRUBBER:

☐ HIGH ENERGY: GAS STREAM PRESSURE DROP _____ INCH H_2O

☐ PACKED: PACKING TYPE _____, PACKING SIZE _____, PACKED HEIGHT _____ IN.

☐ SPRAY: NUMBER OF NOZZLES _____, NOZZLE PRESSURE _____ PSIG

☐ OTHER: SPECIFY _____ ATTACH DESCRIPTION AND SKETCH WITH DIMENSIONS

5. TYPE OF FLOW:

☐ COCURRENT ☐ COUNTERCURRENT ☐ CROSSFLOW

6. SCRUBBER GEOMETRY:

LENGTH IN DIRECTION OF GAS FLOW _____ IN., CROSS-SECTIONAL AREA _____ SQUARE IN.

7. CHEMICAL COMPOSITION OF SCRUBBANT:

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. SCRUBBANT FLOW RATE: GPM	12. SCRUBBANT FLOW RATE: GPM
9. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM
10. INLET GAS TEMPERATURE: °F	14. INLET GAS TEMPERATURE: °F
11. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): _____ % PARTICULATE _____ % GASEOUS	15. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): _____ % PARTICULATE _____ % GASEOUS

OTHER TYPE OF CONTROL EQUIPMENT

1. FLOW DIAGRAM DESIGNATION(S) OF "OTHER TYPE" OF CONTROL EQUIPMENT:

2. GENERIC NAME OF "OTHER" EQUIPMENT:

3. MANUFACTURER:

4. MODEL NAME AND NUMBER:

5. DESCRIPTION AND SKETCH, WITH DIMENSIONS AND FLOW RATES, OF "OTHER" EQUIPMENT:

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
6. FLOW RATES: _____ GPM _____ SCFM	8. FLOW RATES: GPM _____ SCFM
7. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %	9. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %

EMISSION INFORMATION

1. NUMBER OF IDENTICAL CONTROL UNITS OR CONTROL SYSTEMS (DESCRIBE AS REQUIRED):

NONE

AVERAGE OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	2a. -0- GR/SCF	b. -0- LB/HR	c. Not Applicable
CARBON MONOXIDE	3a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
NITROGEN OXIDES	4a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
ORGANIC MATERIAL	5a. N/A PPM (VOL)	b. 10 (Point Source) LB/HR	c. Calculation based on 85.5% efficiency
SULFUR DIOXIDE	6a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
OTHER (SPECIFY)	7a. N/A PPM (VOL)	b. N/A LB/HR	c. Not Applicable

MAXIMUM OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	8a. -0- GR/SCF	b. -0- LB/HR	c. Not Applicable
CARBON MONOXIDE	9a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
NITROGEN OXIDES	10a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
ORGANIC MATERIAL	11a. N/A PPM (VOL)	b. 14.5 (Point Source) LB/HR	c. Calculation based on 85.5% efficiency
SULFUR DIOXIDE	12a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
OTHER (SPECIFY)	13a. N/A PPM (VOL)	b. N/A LB/HR	c. Not Applicable

**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

EXHAUST POINT INFORMATION

1. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT:

Dip Tank Fibre Saturation Unit - EP-1

2. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):

To be determined

3. EXIT HEIGHT ABOVE GRADE:

To be determined

4. EXIT DIAMETER:

To be determined

5. GREASTEST HEIGHT OF NEARBY BUILDINGS:

20 FT

6. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY:

1000 FT

AVERAGE OPERATION OF SOURCE

7. EXIT GAS TEMPERATURE:

(Estimate) 27 °F

8. GAS FLOW RATE THROUGH EACH EXIT:

4500 ACFM

MAXIMUM OPERATION OF SOURCE

9. EXIT GAS TEMPERATURE:

(Estimate) 27 °F

10. GAS FLOW RATE THROUGH EACH EXIT:

4600 ACFM

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER: W. R. MEADOWS INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Road	4. CITY OF EMISSION SOURCE: Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER: Not Known	6. DESIGNATION OF TANK: Tank #39
7. SERIAL NUMBER: Not Known	8. CAPACITY: 6,000 Gallons
9. TANK USE: Storage/Blending of Mineral Spirits & Asphalt	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL: 0
11. TANK SHAPE: ☐ HORIZONTAL ☒ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____	
12. TANK DIAMETER: 8 FT	13. TANK HEIGHT: 16 FT / 14. TANK LENGTH: N/A FT
15. STATUS: ☒ EXISTING ☐ ALTERATION	16: TANK TYPE: ☒ FIXED ROOF ☐ FLOATING ROOF ☐ PRESSURE ☐ OTHER(SPECIFY)_____
17. SEAL: ☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 3 FT.
19. SHELL TYPE: ☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	20. PAINT COLOR: White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

MATERIAL TO BE STORED

25. MATERIAL:	26. DENSITY:	27. VAPOR PRESSURE AT 70°F:
Asphalt/Mineral Spirits Blend	7.5 Pounds/Gallon LB/FT³	2.0 MMHg PSIA

STORAGE CONDITIONS

28. STORAGE TEMPERATURE: MINIMUM 140 °F MAXIMUM 250 °F	29. TANK TURN OVER PER YEAR: At 5,800 Gal April to October Only: 170 ☐ BBLS/ ☒ GALS/ T.O.
30. MAXIMUM FILLING RATE: 10,000 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: April to October Only: 5,580 ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

This Agency is ...rized to require this information under Illinois Revised Statute..., 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER:	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
W. R. MEADOWS, INC.	Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:
46W185 Allen Road	Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER:	6. DESIGNATION OF TANK:
Not Known	Tank #38
7. SERIAL NUMBER:	8. CAPACITY:
Not Known	10,000 Gallons
9. TANK USE:	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL:
Storage of Petroleum Asphalt	-0-

11. TANK SHAPE: ☒ HORIZONTAL ☐ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER:	13. TANK HEIGHT:	14. TANK LENGTH:
8 FT	N/A FT	27 FT

15. STATUS:	16. TANK TYPE:
☒ EXISTING ☐ ALTERATION	☐ PRESSURE ☒ FIXED ROOF ☐ FLOATING ROOF ☐ OTHER(SPECIFY)_____
17. SEAL: ☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 2 FT.
19. SHELL TYPE: ☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	20. PAINT COLOR: Gray-Tank is insulated & Aluminum Wrapped

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

MATERIAL TO BE STORED		
25. MATERIAL: Petroleum Asphalt	26. DENSITY: 8.5 Pounds/Gallon LB/FT³	27. VAPOR PRESSURE AT 70°F: N/L PSIA

STORAGE CONDITIONS	
28. STORAGE TEMPERATURE: MINIMUM 250 °F MAXIMUM 320 °F	29. TANK TURN OVER PER YEAR: at 8,000 Gal. 61 (April to October Only) ☐ BBLS/ ☒ GALS/T.O
30. MAXIMUM FILLING RATE: 11,000 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: 2,800 (April to October Only) ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER:	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
W. R. MEADOWS INC.	Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:
46W185 Allen Rd.	Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER: Not Known	6. DESIGNATION OF TANK: Tank #40
7. SERIAL NUMBER: Not Known	8. CAPACITY: 20,000 Gallons
9. TANK USE: Storage of Asphalt/Mineral Spirits Blend	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL: -0-

11. TANK SHAPE: ☐ HORIZONTAL ☒ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER:	13. TANK HEIGHT:	14. TANK LENGTH:
13'6" FT	19'6" FT	N/A FT

15. STATUS: ☒ EXISTING ☐ ALTERATION	16. TANK TYPE: ☐ PRESSURE ☒ FIXED ROOF ☐ FLOATING ROOF ☐ OTHER(SPECIFY)_____
17. SEAL: ☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 3 FT.
19. SHELL TYPE: ☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	20. PAINT COLOR: White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

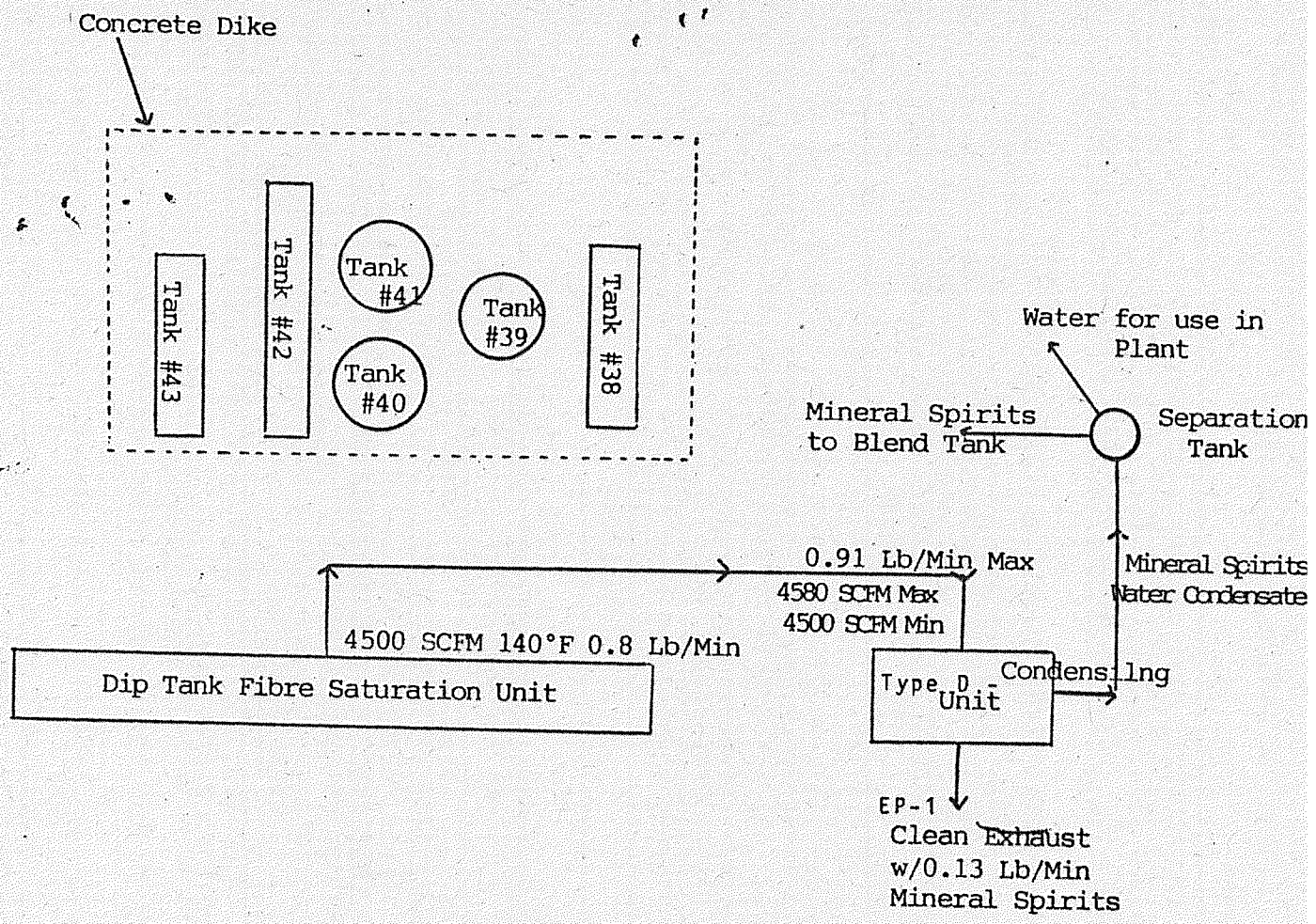
MATERIAL TO BE STORED

25. MATERIAL:	26. DENSITY:	27. VAPOR PRESSURE AT 70°F:
Asphalt/Mineral Spirits Blend	7.5 Pounds/Gallon LB/FT³	2.0 MM Hg PSIA

STORAGE CONDITIONS

28. STORAGE TEMPERATURE: MINIMUM 120 °F MAXIMUM 170 °F	29. TANK TURN OVER PER YEAR: at 19,000 Gal, ☐ BBLS/ ☒ GALS/ T.O. April to October Only: 52
30. MAXIMUM FILLING RATE: 10,000 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: April to October Only: 5,580 ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

W. R. MEADOWS INC.
Dip Tank Fibre Saturation Unit
12-10-96



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

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*DATA AND INFORMATION PROCESS EMISSION SOURCE	

*THIS INFORMATION FORM IS TO BE COMPLETED FOR AN EMISSION SOURCE OTHER THAN A FUEL COMBUSTION EMISSION SOURCE OR AN INCINERATOR. A FUEL COMBUSTION EMISSION SOURCE IS A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED PRIMARILY FOR PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN INCINERATOR IS AN APPARATUS IN WHICH REFUSE IS BURNED.

1. NAME OF PLANT OWNER: W. R. MEADOWS INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hamsphire Plant
3. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Road	4. CITY OF EMISSION SOURCE: Hampshire

GENERAL INFORMATION

5. NAME OF PROCESS: Dip tank fibre saturation unit with controls	6. NAME OF EMISSION SOURCE EQUIPMENT: Dip tank fibre saturation unit	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: W. R. MEADOWS INC.	8. MODEL NUMBER: Not Applicable	9. SERIAL NUMBER: Not Applicable

10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: Figure 1: Fibre saturation unit

11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): Not Applicable

12. AVERAGE OPERATING TIME OF EMISSION SOURCE:	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE:
10 HRS/DAY 6 DAYS/WK 31 WKS/YR	16 HRS/DAY 7 DAYS/WK 35 WKS/YR

14. PERCENT OF ANNUAL THROUGHPUT:
DEC-FEB 0 % MAR-MAY 30 % JUN-AUG 40 % SEPT-NOV 30 %

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.
AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.
AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.
MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.
MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

RAW MATERIAL INFORMATION		
NAME OF RAW MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
20a. Petroleum Asphalt	b. 2080 LB/HR	c. 3120 LB/HR
21a. Mineral Spirits	b. 1760 LB/HR	c. 2640 LB/HR
22a. Raw Fibre Board	b. 4240 LB/HR	c. 6360 LB/HR
23a.	b. LB/HR	c. LB/HR
24a.	b. LB/HR	c. LB/HR

PRODUCT INFORMATION		
NAME OF PRODUCT	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
30a. Saturated Fibre Expansion Joint	b. 8068 LB/HR	c. 12,104 LB/HR
31a.	b. LB/HR	c. LB/HR
32a.	b. LB/HR	c. LB/HR
33a.	b. LB/HR	c. LB/HR
34a.	b. LB/HR	c. LB/HR

WASTE MATERIAL INFORMATION		
NAME OF WASTE MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
40a. Saturator Fines	b. 12 LB/HR	c. 16 LB/HR
41a.	b. LB/HR	c. LB/HR
42a.	b. LB/HR	c. LB/HR
43a.	b. LB/HR	c. LB/HR
44a.	b. LB/HR	c. LB/HR

*FUEL USAGE INFORMATION		
FUEL USED	TYPE	HEAT CONTENT
50a. NATURAL GAS ☒	b. ———	c. 1000 BTU/SCF
OTHER GAS ☐		BTU/SCF
OIL ☐		BTU/GAL
COAL ☐		BTU/LB
OTHER ☐		BTU/LB
d. AVERAGE FIRING RATE PER IDENTICAL SOURCE: 1 Million BTU/HR	e. MAXIMUM FIRING RATE PER IDENTICAL SOURCE: 1 Million BTU/HR	

*THIS SECTION IS TO BE COMPLETED FOR ANY FUEL USED DIRECTLY IN THE PROCESS EMISSION SOURCE, E.G. GAS IN A DRYER, OR COAL IN A MELT FURNACE.

*EMISSION INFORMATION

51. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED): NONE

AVERAGE OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	52a. -0- GR/SCF	b. -0- LB/HR	c. Not A Contaminant
CARBON MONOXIDE	53a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
NITROGEN OXIDES	54a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
ORGANIC MATERIAL	55a. N/A PPM (VOL)	b. 64 (Point Source) 0.26 (Fugitives Drying Boards) LB/HR	c. Mass balance with calculation of emission factor and actual weighing of finished product.
SULFUR DIOXIDE	56a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
**OTHER (SPECIFY)	57a. N/A PPM (VOL)	b. N/A LB/HR	c. Not Applicable

MAXIMUM OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a. -0- GR/SCF	b. -0- LB/HR	c. Not A Contaminant
CARBON MONOXIDE	59a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
NITROGEN OXIDES	60a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
ORGANIC MATERIAL	61a. N/A PPM (VOL)	b. 96 (Point Source) 0.39 (Fugitives Drying Boards) LB/HR	c. Mass balance with calculation of emission factor and actual weighing of finished product.
SULFUR DIOXIDE	62a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
**OTHER (SPECIFY)	63a. N/A PPM (VOL)	b. N/A LB/HR	c. Not Applicable

*ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

***EXHAUST POINT INFORMATION Through Pollution Control Equipment;

64. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: Not Applicalble

65. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):

66. EXIT HEIGHT ABOVE GRADE: FT

67. EXIT DIAMETER: FT

68. GREATEST HEIGHT OF NEARBY BUILDINGS: FT

69. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: FT

AVERAGE OPERATION

70. EXIT GAS TEMPERATURE: °F

71. GAS FLOW RATE THROUGH EACH EXIT: ACFM

MAXIMUM OPERATION

72. EXIT GAS TEMPERATURE: °F

73. GAS FLOW RATE THROUGH EACH EACH EXIT: ACFM

***THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

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ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER:	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
W. R. MEADOWS INC.	Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:
46W185 Allen Road	Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER:	6. DESIGNATION OF TANK:
Not Known	Tank #39
7. SERIAL NUMBER:	8. CAPACITY:
Not Known	6,000 Gallons
9. TANK USE:	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL:
Storage/Blending of Mineral Spirits & Asphalt	-0-

11. TANK SHAPE: ☐ HORIZONTAL ☒ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER:	13. TANK HEIGHT:	14. TANK LENGTH:
8 FT	16 FT	N/A FT

15. STATUS:	16. TANK TYPE:
☒ EXISTING ☐ ALTERATION	☒ FIXED ROOF ☐ FLOATING ROOF ☐ PRESSURE ☐ OTHER(SPECIFY)_____
17. SEAL:	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID:
☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	3 FT.
19. SHELL TYPE:	20. PAINT COLOR:
☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

MATERIAL TO BE STORED		
25. MATERIAL: Asphalt/Mineral Spirits Blend	26. DENSITY: 7.5 Pounds/Gallon LB/FT³	27. VAPOR PRESSURE AT 70°F: 2.0 MMHg PSIA

STORAGE CONDITIONS	
28. STORAGE TEMPERATURE: MINIMUM 140 °F MAXIMUM 250 °F	29. TANK TURN OVER PER YEAR: At 5,800 Gal April to October Only: 170 ☐ BBLS/ ☒ GALS/ T.O.
30. MAXIMUM FILLING RATE: 10,000 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: April to October Only: 5,580 ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

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ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER: W. R. MEADOWS, INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Road	4. CITY OF EMISSION SOURCE: Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER: Not Known	6. DESIGNATION OF TANK: Tank #38
7. SERIAL NUMBER: Not Known	8. CAPACITY: 10,000 Gallons
9. TANK USE: Storage of Petroleum Asphalt	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL: -0-

11. TANK SHAPE: [X] HORIZONTAL [ ] CYLINDRICAL [ ] SPHERICAL [ ] OTHER(SPECIFY)_____

12. TANK DIAMETER: 8 FT	13. TANK HEIGHT: N/A FT	14. TANK LENGTH: 27 FT

15. STATUS: [X] EXISTING [ ] ALTERATION	16: TANK TYPE: [X] FIXED ROOF [ ] FLOATING ROOF [ ] PRESSURE [ ] OTHER(SPECIFY)_____
17. SEAL: [ ] SINGLE [ ] DOUBLE [X] OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 2 FT.
19. SHELL TYPE: [ ] RIVETED [X] WELDED [ ] OTHER(SPECIFY) _____	20. PAINT COLOR: Gray-Tank is insulated & Aluminum Wrapped

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

MATERIAL TO BE STORED

25. MATERIAL:	26. DENSITY:	27. VAPOR PRESSURE AT 70°F:
Petroleum Asphalt	8.5 Pounds/Gallon LB/FT³	N/L PSIA

STORAGE CONDITIONS

28. STORAGE TEMPERATURE: MINIMUM 250 °F MAXIMUM 320 °F

29. TANK TURN OVER PER YEAR: at 8,000 Gal. 61 (April to October Only)
☐ BBLS/ ☒ GALS/ T.O

30. MAXIMUM FILLING RATE: 11,000
☐ BBLS/DAY ☒ GALS/DAY

31. AVERAGE THROUGHPUT: 2,800 (April to October Only)
☐ BBLS/DAY ☒ GALS/DAY

32. PRESSURE EQUALIZERS USED?
☐ YES ☒ NO

33. PERMANENT SUBMERGED LOADING PIPE USED?
☒ YES ☐ NO

34. VAPOR LOSS CONTROL DEVICE?
☐ YES ☒ NO

IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

This Agency ... authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER: W. R. MEADOWS INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Rd.	4. CITY OF EMISSION SOURCE: Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER: Not Known	6. DESIGNATION OF TANK: Tank #40
7. SERIAL NUMBER: Not Known	8. CAPACITY: 20,000 Gallons
9. TANK USE: Storage of Asphalt/Mineral Spirits Blend	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL: -0-

11. TANK SHAPE: ☐ HORIZONTAL ☒ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER: 13'6" FT	13. TANK HEIGHT: 19'6" FT	14. TANK LENGTH: N/A FT

15. STATUS: ☒ EXISTING ☐ ALTERATION	16: TANK TYPE: ☐ PRESSURE ☒ FIXED ROOF ☐ FLOATING ROOF ☐ OTHER(SPECIFY)_____
17. SEAL: ☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 3 FT.
19. SHELL TYPE: ☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	20. PAINT COLOR: White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

MATERIAL TO BE STORED

25. MATERIAL:	26. DENSITY:	27. VAPOR PRESSURE AT 70°F:
Asphalt/Mineral Spirits Blend	7.5 Pounds/Gallon LB/FT³	2.0 MM Hg PSIA

STORAGE CONDITIONS

28. STORAGE TEMPERATURE: MINIMUM 120 °F MAXIMUM 170 °F	29. TANK TURN OVER PER YEAR: at 19,000 Gal, ☐ BBLS/ ☒ GALS/ T.C. April to October Only: 52
30. MAXIMUM FILLING RATE: 10,000 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: April to October Only: 5,580 ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

Exhibit 4

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

P. O. Box 19506, Springfield, IL 62794-9506

217/782-2113

CERTIFIED MAIL

Z 363 544 843

NOTICE OF INCOMPLETENESS

January 13, 1997

W. R. Meadows, Inc.
Attn: David Carey
46W185 Allen Road
Hampshire, Illinois 60140

Application No.:	97010023
I.D. No.:	089045AAL
Applicant's Designation:	006
Received:	January 2, 1997
Construction & Operation of:	Condenser on Dip Tank Fibre Saturation Unit
Location:	46W185 Allen Road, Hampshire

Illinois EPA has determined the above referenced joint construction and operating permit application(s) to be incomplete because information was not provided as required by 35 Ill. Adm. Code 201.152 and 201.157.

Specifically, the following information must be supplied in order for the application(s) to be considered complete:

1. Several pages of the application seem to contain contradictory information. Page 3 of 3 of the APC-220 form indicates uncontrolled VOM emissions of 96 lb/hr (only maximum rates will be discussed). Based on a control of 85.5% as stated on pages 4 and 6 of 6 on Form APC-260, the controlled emissions would be 13.9 lb/hr, which is reasonably close to the 14.5 lb/hr on the APC-260 form. However, the process flow diagram indicates a maximum VOM flow rate to the proposed condenser of 0.91 lb/min which equals 54.6 lb/hr. Which value does W. R. Meadows believe to be correct? If this were interpreted as average, the controlled emission rate of 0.13 lb/mon (7.8 lb/hr) would not agree with the average of 10.0 lb/hr on the APC-260 form.

2. What is the 0.39 lb/hr as fugitive from the saturator on page 6 of 6 of the APC-260 form?

3. Disregarding the issue of whether the emissions from the drying of pallets might be fugitive emissions, how does W. R. Meadows propose that VOM emissions from the saturator and storage tanks combined be less than 20.5 tons/year, the maximum amount allowed in related permit 95120221 for increases from new equipment over the past five years. Normally the Illinois EPA calculates this as maximum emission rate times maximum hours. In this case it would be 14.5 lb/hr times 16/7/35 equals 28.4 tons/year, excluding the storage tank emissions.

4. The process flow diagram indicates a mineral spirits/water separator but the APC-260 form indicates an outlet temperature of 27°F. How is freezing of the water prevented?

5. How does W. R. Meadows propose to monitor the operation? Will temperature of the condenser inlet our outlet be kept continuously.

6. The process flow diagram may be more a block flow diagram and thus places where the lines are shown are not relevant. Could W. R. Meadows explain the capture system for the emissions from the saturator? Is there one vent in the center as shown in the diagram and air pulled toward it from both the entrance and exit of the tank or is the capture system primarily on the outlet of the tank. If pulled from both ends toward the center, could a face velocity be calculated (i.e., air flow divided by area of all openings combined).

7. When construction permit 95120221 was issued on February 22, 1996, it included three storage tanks. Since the emissions were low, the Illinois EPA was not concerned with tank numbers and sizes. The current application includes six tanks. Is W. R. Meadows planning to construct three additional tanks or were six previously constructed.

Illinois EPA will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.152 and 201.157, this reapplication may incorporate by reference the data and information submitted to Illinois EPA in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The reapplication will be considered filed on the date it is received by Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

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

Donald E. Sutton

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

DES:DGP:jar

cc: Region 1

Exhibit 5

W. R. MEADOWS, INC.

P.O. BOX 543 • ELGIN, IL 60121

SEALTIGHT

TELEPHONE: 847-683-4500
800-342-5976
FAX: 847-683-4544

February 4, 1997

Certified-Return Receipt Requested

Illinois Environmental Protection Agency
Division of Air Pollution Control
Attention: Mr. Don Sutton
2200 Churchill Road
Springfield, Illinois 62794-9506

Dear Mr. Sutton:

Attached please find responses to questions the Illinois Environmental Protection Agency has concerning application number 97010023 submitted by W. R. MEADOWS INC., Hampshire, Illinois (identification number 089045AAL). This application is for the construction and operation of a dip tank fiber saturation unit fitted with pollution control equipment to reduce point source VOM emissions from this process. A revised permit application has been enclosed.

Thank you for your prompt response. If you have any questions or require additional information, please contact me at (847) 683-5542.

Sincerely,

Dave Carey

Dave Carey
CHMM, Environmental Specialist

DC/kjo

enc.

cc: Jim Stilling, W. R. MEADOWS, INC.
Jim Dwyer, W. R. MEADOWS, INC.
Harry Meadows, W. R. MEADOWS, INC.
Don Knapp, W. R. MEADOWS, INC.
Jon Faletto, Howard & Howard
Sal Falcone, Black & Veatch

RESPONSE TO IEPA LETTER DATED JANUARY 13, 1997
REGARDING CLARIFICATION OF APPLICATION INFORMATION
FOR W. R. MEADOWS HAMPSHIRE SATURATOR UNIT

1. There was some contradictory information in the application; the information presented in this reply should be regarded as correct and authoritative.

   The actual production rate of saturated boards in 1996 should be considered an average rate. The associated saturator unit emissions for 1996 were 53.5 tons of VOC. There were 1,803 hours of operation in 1996. This equates to 59.4 pounds of emissions per hour, uncontrolled, and 8.6 pounds per hour, controlled. This is the average rate to be used in the application.

   During the 1,803 hours of operation in 1996, 3,616 pallets were saturated, a rate of 2.0 per hour. W. R. MEADOWS feels that a production rate of three pallets per hour can be achieved, at least for short periods of time. This rate of production would emit 89.1 pounds per hour, uncontrolled, and 12.9 pounds per hour, controlled. This is the maximum rate to be used in the applications. The application forms and process flow diagram have been revised to reflect these rates.

2. The "0.39 lb./hr." value appears on page 3 or 3 of the APC-220 form. It represents the drying emissions, over the four-week drying period, associated with three pallets (the maximum that can be saturated in one hour). It was calculated as follows, using a value of 86.6 pounds per pallet lost to drying over four weeks.

   3 pallets/hour x 86.6 pounds/pallet/4-week period = 259.8 pounds
   4 weeks = 4 x 7 days/week x 24 hours/day = 672 hours
   259.8 pounds/672 hours = 0.39 pound/hour

   However, because the application deals solely with control of saturator unit emissions, this figure has been deleted from the revised application.

3. W. R. MEADOWS proposes to limit emissions to 20.5 tons per year, after controls, by limiting the hours of operation. Using 20.5 tons as the maximum allowable rate:

   20.5 tons/year/(1-85.5% control) = 141.4 tons/year, uncontrolled

   This uncontrolled emissions figure includes the storage tanks. Fire version 5.0 emission factors for organic chemical storage, n-decane, were used to calculate total breathing loss (SCC #40701601) and working loss (SCC #40701602) emissions from the blend and mineral spirits tanks. Decane was used as the nearest substitute for mineral spirits, which are 85% nonane. Total emissions from all the blend and spirits tanks are about 100 pounds per year. Rounding up to the nearest tenth of a ton yields 0.1 tone. This leaves 141.3 tons per year, maximum, allocated to the saturator unit.

141.3 tons x 2,000 pounds/ton = 282,600 pounds
282,600 pounds/89.1 pounds/hour = 3,171 hours
89.1 lbs/hr uncontrolled x (1-85% control=12.9 lbs/hr controlled

W. R. MEADOWS proposes to limit controlled emissions to less than 20.5 tons per year, including consideration of tank emissions, by limiting the saturator operation to 3,100 hours per year. This figure is to be used to determine maximum annual emissions instead of the figure found by multiplying 16 hours/day x 7 days/week x 35 weeks/year on page 1 of APC-220. Sixteen-hour per day operations are anticipated to be needed only for brief periods of time.

4. The control system for which the data was provided contains two sets of precoolers and only one operates at any given time. Water is allowed to freeze on the precooler in service until the pressure drop of the saturator exhaust air flow across the precooler exceeds a preset limit. When this occurs the exhaust flow is switched to the next precooler while the first is defrosted and water collected. The water collected is then vaporized in the exhaust of the unit and thus the humidity of air entering the unit is the same as that leaving it. The condensed stream from the precooler is then directed to the main condenser where the stream is further cooled to condense the VOCs to be recovered. Therefore, the outlet gas temperature can drop below the freezing temperature of water. The mineral spirits/water separator is not, strictly speaking, part of the control system. It's purpose is to render the "make-up" mineral spirits as pure as possible because it will be reused in the plant process.

5. At the start-up of the control equipment, a third-party performance test will be conducted to determine control efficiency. Inlet gas and outlet gas VOC concentration will be determined and the efficiency calculated from the difference. The refrigerant temperature that corresponds with the minimum required VOC removal efficiency will be recorded during the test. During normal operation thereafter, the refrigerant temperature must be at or below the temperature recorded during the test. The condenser will be equipped with a chart recorder to continuously monitor the refrigerant temperature.

6. The saturator unit contains several removable metal covers on top which house and protect the chain drive gears and the spring tension adjusting mechanisms. They are spaced evenly throughout the length of the saturator unit. These covers will be used to draw air from the saturator freeboard area above the surface of the bath. Thus, air will be pulled from the saturator at several locations throughout its length. The air will flow into the saturator from both the inlet and outlet and then upwards through the metal covers and into a header that will parallel the saturator unit and run to the control device. The piping design will be such that the flow from the cover closest to the outlet end (where the boards emerge saturated) will be slightly greater than the others. The velocity of air flow through the covers is calculated to be 150 feet/minute.

7. Three (3) storage tanks were utilized in the fibre saturation process during 1996. Three (3) additional storage tanks have been included in the current permit application to provide for additional storage capacity.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62794-9276

APPLICATION FOR PERMIT(A)	FOR AGENCY USE ONLY
[X] CONSTRUCT [X] OPERATE	I.D. NO.
NAME OF EQUIPMENT TO BE CONSTRUCTED OR OPERATED: Dip Tank Fibre Saturation Unit (B)	PERMIT NO.
	DATE

1a. NAME OF OWNER: W. R. MEADOWS INC.		2a. NAME OF OPERATOR: W. R. MEADOWS INC.	
1b. STREET ADDRESS OF OWNER: 46W185 Allen Road		2b. STREET ADDRESS OF OPERATOR: 46W185 Allen Road	
1c. CITY OF OWNER: Hampshire		2c. CITY OF OPERATOR: Hampshire	
1d. STATE OF OWNER: Illinois	1e. ZIP CODE: 60140	2d. STATE OF OPERATOR: Illinois	2e. ZIP CODE: 60140

3a. NAME OF CORPORATE DIVISION OR PLANT: Hampshire Plant		3b. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Road		
3c. CITY OF EMISSION SOURCE: Hampshire	3d. LOCATED WITHIN CITY LIMITS: [X] YES [ ] NO	3e. TOWNSHIP: Hampshire	3f. COUNTY: Kane	3g. ZIP CODE: 60140

ALL CORRESPONDENCE TO: (TITLE AND/OR NAME OF INDIVIDUAL) Dave Carey, CHMM, Environmental Specialist	5. TELEPHONE NUMBER FOR AGENCY TO CALL: (847) 683-4500
6. ADDRESS FOR CORRESPONDENCE: (CHECK ONLY ONE) [ ] OWNER [ ] OPERATOR [X] EMISSION SOURCE	7. YOUR DESIGNATION FOR THIS APPLICATION:(C) 006

8. THE UNDERSIGNED HEREBY MAKES APPLICATION FOR A PERMIT AND CERTIFIES THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT, AND FURTHER CERTIFIES THAT ALL PREVIOUSLY SUBMITTED INFORMATION REFERENCED IN THIS APPLICATION REMAINS TRUE, CORRECT AND CURRENT. BY AFFIXING HIS SIGNATURE HERETO HE FURTHER CERTIFIES THAT HE IS AUTHORIZED TO EXECUTE THIS APPLICATION.

AUTHORIZED SIGNATURE(S):(D)

BY SIGNATURE: David Carey	1-29-97 DATE	BY SIGNATURE	DATE
TYPED OR PRINTED NAME OF SIGNER: David Carey		TYPED OR PRINTED NAME OF SIGNER	
TITLE OF SIGNER: CHMM, Environmental Specialist		TITLE OF SIGNER	

(A) THIS FORM IS TO PROVIDE THE AGENCY WITH GENERAL INFORMATION ABOUT THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS FORM MAY BE USED TO REQUEST A CONSTRUCTION PERMIT, AN OPERATING PERMIT, A CONSTRUCTION OR OPERATING PERMIT.

(B) ENTER THE GENERIC NAME OF THE EQUIPMENT TO BE CONSTRUCTED OR OPERATED. THIS NAME WILL APPEAR ON THE PERMIT WHICH MAY BE ISSUED PURSUANT TO THIS APPLICATION. THIS FORM MUST BE ACCOMPANIED BY OTHER APPLICABLE FORMS AND INFORMATION.

C) PROVIDE A DESIGNATION IN ITEM 7 ABOVE WHICH YOU WOULD LIKE THE AGENCY TO USE FOR IDENTIFICATION OF YOUR EQUIPMENT. YOUR DESIGNATION WILL BE REFERENCED IN CORRESPONDENCE FROM THIS AGENCY RELATIVE TO THIS APPLICATION. YOUR DESIGNATION MUST NOT EXCEED TEN (10) CHARACTERS.

(D) THIS APPLICATION MUST BE SIGNED IN ACCORDANCE WITH 35 ILL. ADM. CODE 201.154 OR 201.159 WHICH STATES: "ALL APPLICATIONS AND SUPPLEMENTS THERETO SHALL BE SIGNED BY THE OWNER AND OPERATOR OF THE EMISSION SOURCE OR AIR POLLUTION CONTROL EQUIPMENT, OR THEIR AUTHORIZED AGENT, AND SHALL BE ACCOMPANIED BY EVIDENCE OF AUTHORITY TO SIGN THE APPLICATION."

IF THE ONWER OR OPERATOR IS A CORPORATION, SUCH CORPORATION MUST HAVE ON FILE WITH THE AGENCY A CERTIFIED COPY OF A RESOLUTION OF THE CORPORATION'S BOARD OF DIRECTORS AUTHORIZING THE PERSONS SIGNING THIS APPLICATION TO CAUSE OR ALLOW THE CONSTRUCTION OR OPERATION OF THE EQUIPMENT TO BE COVERED BY THE PERMIT.

9. DOES THIS APPLICATION CONTAIN A PLOT PLAN/MAP:

[ ] YES [X] NO

IF A PLOT PLAN/MAP HAS PREVIOUSLY BEEN SUBMITTED, SPECIFY:

AGENCY I.D. NUMBER _____ APPLICATION NUMBER _____

IS THE APPROXIMATE SIZE OF APPLICANT'S PREMISES LESS THAN 1 ACRE?

[ ] YES [X] NO: SPECIFY 80 ACRES

10. DOES THIS APPLICATION CONTAIN A PROCESS FLOW DIAGRAM(S) THAT ACCURATELY AND CLEARLY REPRESENTS CURRENT PRACTICE.

[X] YES [ ] NO

11a. WAS ANY EQUIPMENT, COVERED THIS APPLICATION, OWNED OR CONTRACTED FOR, BY THE APPLICANT PRIOR TO APRIL 14, 1972:

[ ] YES [X] NO

IF "YES" ATTACH AN ADDITIONAL SHEET, EXHIBIT A, THAT:
(a) LISTS OR DESCRIBES THE EQUIPMENT
(b) STATES WHETHER THE EQUIPMENT WAS IN COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING THE CONTROL OF AIR POLLUTION PRIOR TO APRIL 4, 1972

11b. HAS ANY EQUIPMENT, COVERED BY THIS APPLICATION, NOTPREVIOUSLY RECEIVED AN OPERATING PERMIT:

[ ] YES [X] NO

IF "YES", ATTACH AN ADDITIONAL SHEET, EXHIBIT B, THAT:
(a) LISTS OR DESCRIBES THE EQUIPMENT
(b) STATES WHETHER THE EQUIPMENT
(I) IS ORIGINAL OR ADDITIONAL EQUIPMENT
(II) REPLACES EXISTING EQUIPMENT, OR
(III) MODIFIES EXISTING EQUIPMENT
(c) PROVIDES THE ANTICIPATED OR ACTUAL DATES OF THE COMMENCEMENT OF CONSTRUCTION AND THE START-UP OF THE EQUIPMENT

12. IF THIS APPLICATION INCORPORATES BY REFERENCE A PREVIOUSLY GRANTED PERMIT(S), HAS FORM APC-210, "DATA AND INFORMATION—INCORPORATION BY REFERENCE" BEEN COMPLETED. Not Applicable

APPLICATION FOR OPERATING PERMIT ONL.

13. DOES THE STARTUP OF AN EMISSION SOURCE COVERED BY THIS APPLICATION PRODUCE AIR CONTAMINANT EMISSION IN EXCESS OF APPLICABLE STANDARDS:

[ ] YES [X] NO

IF "YES," HAS FORM APC-203, "OPERATION DURING STARTUP" BEEN COMPLETED FOR THIS SOURCE.

[ ] YES [ ] NO

14. DOES THIS APPLICATION REQUEST PERMISSION TO OPREATE AN EMISSION SOURCE DURING MALFUNCTIONS OR BREAKDOWNS:

[ ] YES [X] NO

IF "YES," HAS FORM APC-204, "OPERATION DURING MALFUNCTION AND BREAKDOWN" BEEN COMPLETED FOR THIS SOURCE

[ ] YES [ ] NO

15. IS AN EMISSION SOURCE COVERED BY THIS APPLICATION SUBJECT TO A FUTURE COMPLIANCE DATE:

[ ] YES [X] NO

IF "YES," HAS FORM APC-202, "COMPLIANCE PROGRAM & PROJECT COMPLETION SCHEDULE," BEEN COMPLETED FOR THIS SOURCE:

[ ] YES [ ] NO

16. DOES THE FACILITY COVERED BY THIS APPLICATION REQUIRE AN EPISODE ACTION PLAN (REFER TO GUIDELINES FOR EPISODE ACTION PLANS):

[ ] YES [X] NO

17. LIST AND IDENTIFY ALL FORMS, EXHIBITS, AND OTHER INFORMATION SUBMITTED AS PART OF THIS APPLICATION. INCLUDE THE PAGE NUMBERS OF EACH ITEM (ATTACH ADDITIONAL SHEETS IF NECESSARY):

Cover letter, APC 220, APC 260, Facility Plot Plan

TOTAL NUMBER OF PAGES _____

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

This agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111½, Section 1039. Disclosure of this information is required under that section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center

*DATA AND INFORMATION AIR POLLUTION CONTROL EQUIPMENT	

*THIS INFORMATION FORM IS FOR AN INDIVIDUAL UNIT OF AIR POLLUTION CONTROL EQUIPMENT OR AN AIR POLLUTION CONTROL SYSTEM.

1. NAME OF OWNER: W. R. MEADOWS INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hampshire Plant
3. STREET ADDRESS OF CONTROL EQUIPMENT: 46W185 Allen Road	4. CITY OF CONTROL EQUIPMENT: Hampshire
5. NAME OF CONTROL EQUIPMENT OR CONTROL SYSTEM: Condensing Unit to control point source VOC emissions from the dip tank fibre saturation unit.	

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION.
2. COMPLETE THE APPROPRIATE SECTION FOR THE UNIT OF CONTROL EQUIPMENT, OR THE APPROPRIATE SECTIONS FOR THE CONTROL SYSTEM. BE CERTAIN THAT THE ARRANGEMENT OF VARIOUS UNITS IN A CONTROL SYSTEM IS MADE CLEAR IN THE PROCESS FLOW DIAGRAM.
3. COMPLETE PAGE 6 OF THIS FORM, EMISSION INFORMATION AND EXHAUST POINT INFORMATION.
4. EFFICIENCY VALUES SHOULD BE SUPPORTED WITH A DETAILED EXPLANATION OF THE METHOD OF CALCULATION, THE MANNER OF ESTIMATION, OR THE SOURCE OF INFORMATION. REFERENCE TO THIS FORM ANY RELEVANT INFORMATION OR EXPLANATION INCLUDED IN THIS PERMIT APPLICATION.
5. EFFICIENCY VALUES AND CERTAIN OTHER ITEMS OF INFORMATION ARE TO BE GIVEN FOR AVERAGE AND MAXIMUM OPERATION OF THE SOURCE EQUIPMENT. FOR EXAMPLE, "MAXIMUM EFFICIENCY" IS THE EFFICIENCY OF THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT MAXIMUM OPERATION, AND "AVERAGE FLOW RATE" IS THE FLOW RATE INTO THE CONTROL EQUIPMENT WHEN THE SOURCE IS AT AVERAGE OPERATION.
6. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS", APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
MAXIMUM OPERATION - THE GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

ADSORPTION UNIT

1. FLOW DIAGRAM DESIGNATION(S) OF ADSORPTION UNIT: Condensing Unit

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. ADSORBENT:
☐ ACTIVATED CHARCOAL: TYPE _____ ☐ OTHER: SPECIFY _____

5. ADSORBATE(S):

6. NUMBER OF BEDS PER UNIT:

7. WEIGHT OF ADSORBENT PER BED: LB

8. DIMENSIONS OF BED:
THICKNESS _____ IN, SURFACE AREA _____ SQUARE IN

9. INLET GAS TEMPERATURE: °F

10. PRESSURE DROP ACROSS UNIT: INCH H_2O GAUGE

11. TYPE OF REGENERATION:
☐ REPLACEMENT ☐ STEAM ☐ OTHER: SPECIFY _____

12. METHOD OF REGENERATION:
☐ ALTERNATE USE OF _____ ENTIRE UNITS ☐ ALTERNATE USE OF _____ BEDS IN A SINGLE UNIT
☐ SOURCE SHUT DOWN ☐ OTHER: DESCRIBE

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
13. TIME ON LINE BEFORE REGENERATION: MIN/BED	15. TIME ON LINE BEFORE REGENERATION: MIN/BED
14. EFFICIENCY OF ADSORBER (SEE INSTRUCTION 4): %	16. EFFICIENCY OF ADSORBER (SEE INSTRUCTION 4): %

AFTERBURNER

1. FLOW DIAGRAM DESIGNATION(S) OF AFTERBURNER:

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

4. COMBUSTION CHAMBER DIMENSIONS:
LENGTH _____ IN, CROSS-SECTIONAL AREA _____ SQUARE IN.

5. INLET GAS TEMPERATURE: °F

6. OPERATING TEMPERATURE OF COMBUSTION CHAMBER: °F

7. FUEL:
☐ GAS ☐ OIL: SULFUR _____ WT%

8. BURNERS PER AFTERBURNER: @ BTU/HR EACH

9. CATALYST USED:
☐ NO ☐ YES: DESCRIBE CATALYST _____

10. HEAT EXCHANGER USED:
☐ NO ☐ YES: DESCRIBE HEAT EXCHANGER _____

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
11. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM
12. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %	14. EFFICIENCY OF AFTERBURNER (SEE INSTRUCTION 4): %

CYCLONE

1. FLOW DIAGRAM DESIGNATION(S) OF CYCLONE:

2. MANUFACTURER:

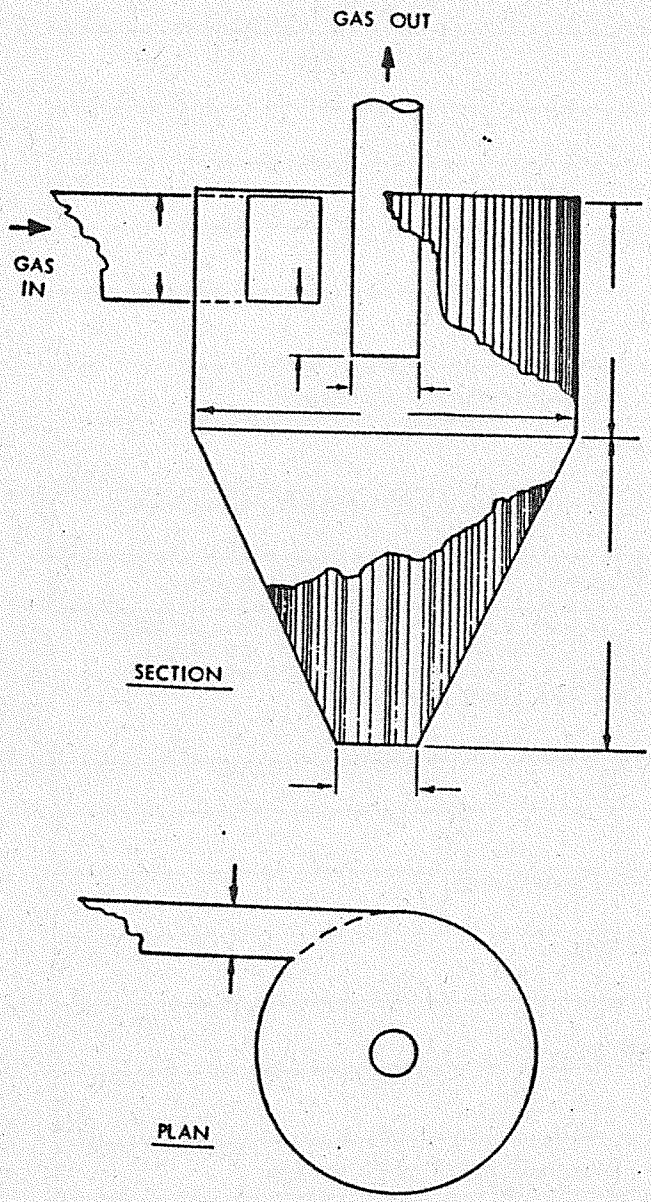
3. MODEL:

4. TYPE OF CYCLONE:
☐ SIMPLE ☐ MULTIPLE

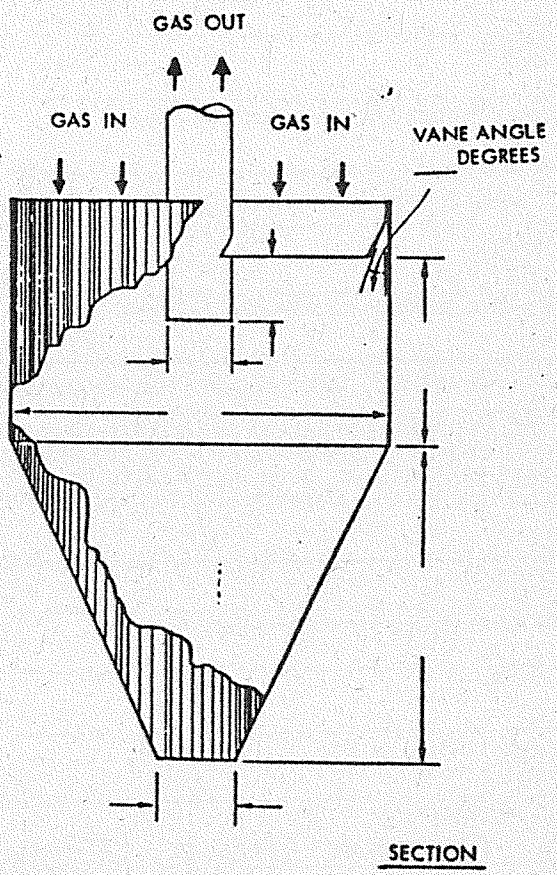
5. NUMBER OF CYCLONES IN EACH MULTIPLE CYCLONE:

6. DIMENSION THE APPROPRIATE SKETCH (IN INCHES) OR PROVIDE A DRAWING WITH EQUIVALENT INFORMATION:

TANGENTIAL INLET CYCLONE



AXIAL INLET CYCLONE
(INDIVIDUAL CYCLONE OF MULTIPLE CYCLONE)



NOT TO SCALE

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
GAS FLOW RATE: SCFM	9. GAS FLOW RATE: SCFM
8. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %	10. EFFICIENCY OF CYCLONE (SEE INSTRUCTION 4): %

CONDENSER

1. FLOW DIAGRAM DESIGNATION(S) OF CONDENSER: Condensing Unit

2. MANUFACTURER:	3. MODEL NAME AND NUMBER:	4. HEAT EXCHANGE AREA:
To be determined	To be determined	2 at 15 Each FT^2

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
5. COOLANT FLOW RATE PER CONDENSER: WATER N/A GPM AIR N/A SCFM; OTHER: TYPE R-22, FLOW RATE 3400 Lb./Hr.	10. COOLANT FLOW RATE PER CONDENSER: WATER N/A GPM AIR N/A SCFM; OTHER: TYPE R-22, FLOW RATE 3500 Lb./Hr.
6. GAS FLOW RATE: 4500 SCFM	11. GAS FLOW RATE: 4680 SCFM
7. COOLANT TEMPERATURE: INLET 2 °F OUTLET 20 °F	12. COOLANT TEMPERATURE: INLET 2 °F OUTLET 20 °F
8. GAS TEMPERATURE: INLET 140°F OUTLET 27°F	13. GAS TEMPERATURE: INLET 140°F OUTLET 27° F
9. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): 85.5 Overall %	14. EFFICIENCY OF CONDENSER (SEE INSTRUCTION 4): 85.5 Overall %

*ELECTRICAL PRECIPITATOR

1. FLOW DIAGRAM DESIGNATION OF ELECTRICAL PRECIPITATOR:

2. MANUFACTURER:	3. MODEL NAME AND NUMBER:

4. COLLECTING ELECTRODE AREA PER CONTROL DEVICE: FT^2

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
5. GAS FLOW RATE: SCFM	7. GAS FLOW RATE: SCFM
6. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %	8. EFFICIENCY OF ELECTRICAL PRECIPITATOR (SEE INSTRUCTION 4): %

SUBMIT THE MANUFACTURER'S SPECIFICATIONS FOR THE ELECTRICAL PRECIPITATOR. REFERENCE THE INFORMATION TO THIS FORM.

*ELECTRICAL PRECIPITATORS VARY GREATLY IN THEIR DESIGN AND IN THEIR COMPLEXITY. THE ITEMS IN THIS SECTION PROVIDE A MINIMUM AMOUNT OF INFORMATION. THE APPLICANT MUST, HOWEVER, SUBMIT WITH THIS APPLICATION THE MANUFACTURER'S SPECIFICATIONS, INCLUDING ANY DRAWINGS, TECHNICAL DOCUMENTS, ETC. IF THE INFORMATION PROVIDED BY THE MANUFACTURER'S SPECIFICATIONS IS INSUFFICIENT FOR FULL AND ACCURATE ANALYSIS, THE AGENCY WILL REQUEST SPECIFIC ADDITIONAL INFORMATION.

FILTER UNIT

1. FLOW DIAGRAM DESIGNATION(S) OF FILTER UNIT:

2. MANUFACTURER:	3. MODEL NAME AND NUMBER:
4. FILTERING MATERIAL:	5. FILTERING AREA:

6. CLEANING METHOD:
☐ SHAKER ☐ REVERSE AIR ☐ PULSE AIR ☐ PULSE JET ☐ OTHER: SPECIFY

7. GAS COOLING METHOD: ☐ DUCTWORK: LENGTH ____ FT., DIAM ____ IN.
☐ BLEED-IN AIR ☐ WATER SPRAY ☐ OTHER: SPECIFY

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. GAS FLOW RATE (FROM SOURCE): SCFM	12. GAS FLOW RATE (FROM SOURCE): SCFM
9. GAS COOLING FLOW RATE: BLEED-IN AIR ____ SCFM, WATER SPRAY ____ GPM	13. GAS COOLING FLOW RATE: BLEED-IN AIR ____ SCFM, WATER SPRAY ____ GPM
10. INLET GAS CONDITION: TEMPERATURE ____ °F DEWPOINT ____ °F	14. INLET GAS CONDITION: TEMPERATURE ____ °F DEWPOINT ____ °F
11. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4): %	15. EFFICIENCY OF FILTER UNIT (SEE INSTRUCTION 4): %

SCRUBBER

1. FLOW DIAGRAM DESIGNATION(S) OF SCRUBBER:

2. MANUFACTURER:

3. MODEL NAME AND NUMBER:

TYPE OF SCRUBBER:

☐ HIGH ENERGY: GAS STREAM PRESSURE DROP _____ INCH H_2O

☐ PACKED: PACKING TYPE _____, PACKING SIZE _____, PACKED HEIGHT _____ IN.

☐ SPRAY: NUMBER OF NOZZLES _____, NOZZLE PRESSURE _____ PSIG

☐ OTHER: SPECIFY _____ ATTACH DESCRIPTION AND SKETCH WITH DIMENSIONS

5. TYPE OF FLOW:

☐ COCURRENT ☐ COUNTERCURRENT ☐ CROSSFLOW

6. SCRUBBER GEOMETRY:

LENGTH IN DIRECTION OF GAS FLOW _____ IN., CROSS-SECTIONAL AREA _____ SQUARE IN.

7. CHEMICAL COMPOSITION OF SCRUBBANT:

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
8. SCRUBBANT FLOW RATE: GPM	12. SCRUBBANT FLOW RATE: GPM
9. GAS FLOW RATE: SCFM	13. GAS FLOW RATE: SCFM
10. INLET GAS TEMPERATURE: °F	14. INLET GAS TEMPERATURE: °F
11. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): _____ % PARTICULATE _____ % GASEOUS	15. EFFICIENCY OF SCRUBBER (SEE INSTRUCTION 4): _____ % PARTICULATE _____ % GASEOUS

OTHER TYPE OF CONTROL EQUIPMENT

1. FLOW DIAGRAM DESIGNATION(S) OF "OTHER TYPE" OF CONTROL EQUIPMENT:

2. GENERIC NAME OF "OTHER" EQUIPMENT:

3. MANUFACTURER:

4. MODEL NAME AND NUMBER:

5. DESCRIPTION AND SKETCH, WITH DIMENSIONS AND FLOW RATES, OF "OTHER" EQUIPMENT:

AVERAGE OPERATION OF SOURCE	MAXIMUM OPERATION OF SOURCE
6. FLOW RATES: _____ GPM _____ SCFM	8. FLOW RATES: _____ GPM _____ SCFM
7. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %	9. EFFICIENCY OF "OTHER" EQUIPMENT (SEE INSTRUCTION 4): %

EMISSION INFORMATION

1. NUMBER OF IDENTICAL CONTROL UNITS OR CONTROL SYSTEMS (DESCRIBE AS REQUIRED):

NONE

AVERAGE OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	2a. -0- GR/SCF	b. -0- LB/HR	c. Not Applicable
CARBON MONOXIDE	3a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
NITROGEN OXIDES	4a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
ORGANIC MATERIAL	5a. N/A PPM (VOL)	b. 8.6 lb./hr.	c. Calculation based on 85.5% efficiency
SULFUR DIOXIDE	6a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
OTHER (SPECIFY)	7a. N/A PPM (VOL)	b. N/A LB/HR	c. Not Applicable

MAXIMUM OPERATION OF SOURCE

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL CONTROL UNIT OR CONTROL SYSTEM		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	8a. -0- GR/SCF	b. -0- LB/HR	c. Not Applicable
CARBON MONOXIDE	9a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
NITROGEN OXIDES	10a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
ORGANIC MATERIAL	11a. N/A PPM (VOL)	b. 12.9 lb./hr.	c. Calculation based on 85.5% efficiency
SULFUR DIOXIDE	12a. -0- PPM (VOL)	b. -0- LB/HR	c. Not Applicable
OTHER (SPECIFY)	13a. N/A PPM (VOL)	b. N/A LB/HR	c. Not Applicable

**"OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

EXHAUST POINT INFORMATION

1. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT:

Dip Tank Fibre Saturation Unit - EP-1

2. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):

To be determined

3. EXIT HEIGHT ABOVE GRADE:

To be determined

4. EXIT DIAMETER:

To be determined

5. GREASTEST HEIGHT OF NEARBY BUILDINGS:

20 FT

6. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY:

1000 FT

AVERAGE OPERATION OF SOURCE

7. EXIT GAS TEMPERATURE:

(Estimate) 27 °F

8. GAS FLOW RATE THROUGH EACH EXIT:

4500 ACFM

MAXIMUM OPERATION OF SOURCE

9. EXIT GAS TEMPERATURE:

(Estimate) 27 °F

10. GAS FLOW RATE THROUGH EACH EXIT:

4600 ACFM

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER:	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
W. R. MEADOWS INC.	Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:
46W185 Allen Road	Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER:	6. DESIGNATION OF TANK:
Not Known	Tank #39
7. SERIAL NUMBER:	8. CAPACITY:
Not Known	6,000 Gallons
9. TANK USE:	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL:
Storage/Blending of Mineral Spirits & Asphalt	0

11. TANK SHAPE: ☐ HORIZONTAL ☒ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER:	13. TANK HEIGHT:	14. TANK LENGTH:
8 FT	16 FT	N/A FT

15. STATUS:	16: TANK TYPE:
☒ EXISTING ☐ ALTERATION	☒ FIXED ROOF ☐ FLOATING ROOF ☐ PRESSURE ☐ OTHER(SPECIFY)_____
17. SEAL:	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID:
☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	3 FT.
19. SHELL TYPE:	20. PAINT COLOR:
☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

MATERIAL TO BE STORED		
25. MATERIAL: Asphalt/Mineral Spirits Blend	26. DENSITY: 7.5 Pounds/Gallon LB/FT³	27. VAPOR PRESSURE AT 70°F: 2.0 MMHg PSIA

STORAGE CONDITIONS			
28. STORAGE TEMPERATURE: MINIMUM 140 °F MAXIMUM 250 °F		29. TANK TURN OVER PER YEAR: At 5,800 Gal April to October Only: 170	☐ BBLS/ ☒ GALS/ T.O.
30. MAXIMUM FILLING RATE: 10,000	☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: April to October Only: 5,580	☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO		33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO	
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.		

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER: W. R. MEADOWS, INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Road	4. CITY OF EMISSION SOURCE: Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER: Not Known	6. DESIGNATION OF TANK: Tank #38
7. SERIAL NUMBER: Not Known	8. CAPACITY: 10,000 Gallons
9. TANK USE: Storage of Petroleum Asphalt	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL: -0-

11. TANK SHAPE: ☒ HORIZONTAL ☐ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY) _____

12. TANK DIAMETER: 8 FT	13. TANK HEIGHT: N/A FT	14. TANK LENGTH: 27 FT

15. STATUS: ☒ EXISTING ☐ ALTERATION	16. TANK TYPE: ☒ FIXED ROOF ☐ FLOATING ROOF ☐ PRESSURE ☐ OTHER(SPECIFY) _____
17. SEAL: ☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 2 FT.
19. SHELL TYPE: ☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	20. PAINT COLOR: Gray-Tank is insulated & Aluminum Wrapped

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

MATERIAL TO BE STORED		
25. MATERIAL: Petroleum Asphalt	26. DENSITY: 8.5 Pounds/Gallon LB/FT³	27. VAPOR PRESSURE AT 70°F: N/L PSIA

STORAGE CONDITIONS	
28. STORAGE TEMPERATURE: MINIMUM 250 °F MAXIMUM 320 °F	29. TANK TURN OVER PER YEAR: at 8,000 Gal. 61 (April to October Only) ☐ BBLS/ ☒ GALS/T.O
30. MAXIMUM FILLING RATE: 11,000 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: 2,800 (April to October Only) ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

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STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER: W. R. MEADOWS INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Rd.	4. CITY OF EMISSION SOURCE: Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER: Not Known	6. DESIGNATION OF TANK: Tank #40
7. SERIAL NUMBER: Not Known	8. CAPACITY: 20,000 Gallons
9. TANK USE: Storage of Asphalt/Mineral Spirits Blend	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL: -0-

11. TANK SHAPE: ☐ HORIZONTAL ☒ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER: 13'6" FT	13. TANK HEIGHT: 19'6" FT	14. TANK LENGTH: N/A FT

15. STATUS: ☒ EXISTING ☐ ALTERATION	16: TANK TYPE: ☒ FIXED ROOF ☐ FLOATING ROOF ☐ PRESSURE ☐ OTHER(SPECIFY)_____
17. SEAL: ☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 3 FT.
19. SHELL TYPE: ☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	20. PAINT COLOR: White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

IL 532 0254
IPC 232 (REV. 09/90)

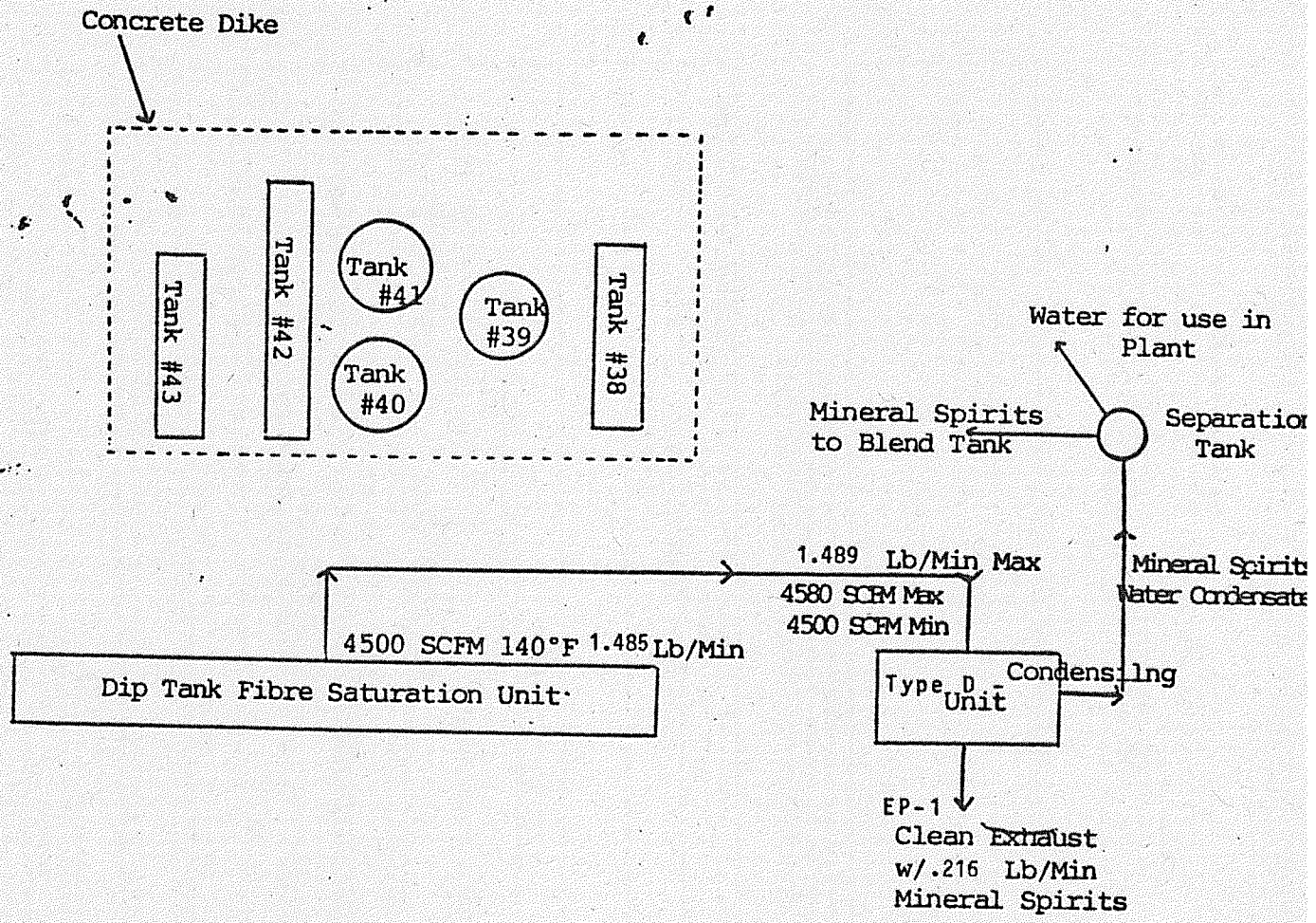
MATERIAL TO BE STORED

25. MATERIAL:	26. DENSITY:	27. VAPOR PRESSURE AT 70°F:
Asphalt/Mineral Spirits Blend	7.5 Pounds/Gallon LB/FT³	2.0 MM Hg PSIA

STORAGE CONDITIONS

28. STORAGE TEMPERATURE: MINIMUM 120 °F MAXIMUM 170 °F	29. TANK TURN OVER PER YEAR: at 19,000 Gal., April to October Only: 52 ☐ BBLS/ ☒ GALS/ T.O.
30. MAXIMUM FILLING RATE: 10,000 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: April to October Only: 5,580 ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

W. R. MEADOWS INC.
Dip Tank Fibre Saturation Unit
12-10-96



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

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*DATA AND INFORMATION PROCESS EMISSION SOURCE	

*THIS INFORMATION FORM IS TO BE COMPLETED FOR AN EMISSION SOURCE OTHER THAN A FUEL COMBUSTION EMISSION SOURCE OR AN INCINERATOR. A FUEL COMBUSTION EMISSION SOURCE IS A FURNACE, BOILER, OR SIMILAR EQUIPMENT USED PRIMARILY FOR PRODUCING HEAT OR POWER BY INDIRECT HEAT TRANSFER. AN INCINERATOR IS AN APPARATUS IN WHICH REFUSE IS BURNED.

1. NAME OF PLANT OWNER: W. R. MEADOWS INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hamsphire Plant
3. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Road	4. CITY OF EMISSION SOURCE: Hampshire

GENERAL INFORMATION

5. NAME OF PROCESS: Dip tank fibre saturation unit with controls	6. NAME OF EMISSION SOURCE EQUIPMENT: Dip tank fibre saturation unit	
7. EMISSION SOURCE EQUIPMENT MANUFACTURER: W. R. MEADOWS INC.	8. MODEL NUMBER: Not Applicable	9. SERIAL NUMBER: Not Applicable

10. FLOW DIAGRAM DESIGNATION(S) OF EMISSION SOURCE: Figure 1: Fibre saturation unit

11. IDENTITY(S) OF ANY SIMILAR SOURCE(S) AT THE PLANT OR PREMISES NOT COVERED BY THE FORM (IF THE SOURCE IS COVERED BY ANOTHER APPLICATION, IDENTIFY THE APPLICATION): Not Applicable

12. AVERAGE OPERATING TIME OF EMISSION SOURCE:	13. MAXIMUM OPERATING TIME OF EMISSION SOURCE:
10 HRS/DAY 6 DAYS/WK 31 WKS/YR	16 HRS/DAY 7 DAYS/WK 35 WKS/YR

* But limited to 3100 hrs./year total

14. PERCENT OF ANNUAL THROUGHPUT:
DEC-FEB 0 % MAR-MAY 30 % JUN-AUG 40 % SEPT-NOV 30 %

INSTRUCTIONS

1. COMPLETE THE ABOVE IDENTIFICATION AND GENERAL INFORMATION SECTION.
2. COMPLETE THE RAW MATERIAL, PRODUCT, WASTE MATERIAL, AND FUEL USAGE SECTIONS FOR THE PARTICULAR SOURCE EQUIPMENT. COMPOSITIONS OF MATERIALS MUST BE SUFFICIENTLY DETAILED TO ALLOW DETERMINATION OF THE NATURE AND QUANTITY OF POTENTIAL EMISSIONS. IN PARTICULAR, THE COMPOSITION OF PAINTS, INKS, ETC., AND ANY SOLVENTS MUST BE FULLY DETAILED.
3. EMISSION AND EXHAUST POINT INFORMATION MUST BE COMPLETED, UNLESS EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.
4. OPERATING TIME AND CERTAIN OTHER ITEMS REQUIRE BOTH AVERAGE AND MAXIMUM VALUES.
5. FOR GENERAL INFORMATION REFER TO "GENERAL INSTRUCTIONS FOR PERMIT APPLICATIONS," APC-201.

DEFINITIONS

AVERAGE - THE VALUE THAT SUMMARIZES OR REPRESENTS THE GENERAL CONDITION OF THE EMISSION SOURCE, OR THE GENERAL STATE OF PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
AVERAGE OPERATING TIME - ACTUAL TOTAL HOURS OF OPERATION FOR THE PRECEDING TWELVE MONTH PERIOD.
AVERAGE RATE - ACTUAL TOTAL QUANTITY OF "MATERIAL" FOR THE PRECEDING TWELVE MONTH PERIOD, DIVIDED BY THE AVERAGE OPERATING TIME.
AVERAGE OPERATION - OPERATION TYPICAL OF THE PRECEDING TWELVE MONTH PERIOD, AS REPRESENTED BY AVERAGE OPERATING TIME AND AVERAGE RATES.

MAXIMUM - THE GREATEST VALUE ATTAINABLE OR ATTAINED FROM THE EMISSION SOURCE, OR THE PERIOD OF GREATEST OR UTMOST PRODUCTION OF THE EMISSION SOURCE. SPECIFICALLY:
MAXIMUM OPERATING TIME - GREATEST EXPECTED TOTAL HOURS OF OPERATIONS FOR ANY TWELVE MONTH PERIOD.
MAXIMUM RATE - GREATEST QUANTITY OF "MATERIAL" EXPECTED PER ANY ONE HOUR OF OPERATION.
MAXIMUM OPERATION - GREATEST EXPECTED OPERATION, AS REPRESENTED BY MAXIMUM OPERATING TIME AND MAXIMUM RATES.

RAW MATERIAL INFORMATION

NAME OF RAW MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
20a. Petroleum Asphalt	b. 2080 LB/HR	c. 3120 LB/HR
21a. Mineral Spirits	b. 1760 LB/HR	c. 2640 LB/HR
22a. Raw Fibre Board	b. 4240 LB/HR	c. 6360 LB/HR
23a.	b. LB/HR	c. LB/HR
24a.	b. LB/HR	c. LB/HR

PRODUCT INFORMATION

NAME OF PRODUCT	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
30a. Saturated Fibre Expansion Joint	b. 8068 LB/HR	c. 12,104 LB/HR
31a.	b. LB/HR	c. LB/HR
32a.	b. LB/HR	c. LB/HR
33a.	b. LB/HR	c. LB/HR
34a.	b. LB/HR	c. LB/HR

WASTE MATERIAL INFORMATION

NAME OF WASTE MATERIAL	AVERAGE RATE PER IDENTICAL SOURCE	MAXIMUM RATE PER IDENTICAL SOURCE
40a. Saturator Fines	b. 12 LB/HR	c. 16 LB/HR
41a.	b. LB/HR	c. LB/HR
42a.	b. LB/HR	c. LB/HR
43a.	b. LB/HR	c. LB/HR
44a.	b. LB/HR	c. LB/HR

*FUEL USAGE INFORMATION

FUEL USED	TYPE	HEAT CONTENT
50a. NATURAL GAS ☒	b.	c. 1000 BTU/SCF
OTHER GAS ☐		BTU/SCF
OIL ☐		BTU/GAL
COAL ☐		BTU/LB
OTHER ☐		BTU/LB

*a. AVERAGE FIRING RATE PER IDENTICAL SOURCE: 1 Million BTU/HR

*c. MAXIMUM FIRING RATE PER IDENTICAL SOURCE: 1 Million BTU/HR

*THIS SECTION IS TO BE COMPLETED FOR ANY FUEL USED DIRECTLY IN THE PROCESS EMISSION SOURCE, E.G. GAS IN A DRYER, OR COAL IN A MELT FURNACE.

EMISSION INFORMATION

51. NUMBER OF IDENTICAL SOURCES (DESCRIBE AS REQUIRED): NONE

AVERAGE OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	52a. -0- GR/SCF	b. -0- LB/HR	c. Not A Contaminant
CARBON MONOXIDE	53a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
NITROGEN OXIDES	54a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
ORGANIC MATERIAL	55a. N/A PPM (VOL)	b. 59.4 lb./hr.	c. Mass balance with calculation of emission factor and actual weighing of finished product.
SULFUR DIOXIDE	56a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
OTHER (SPECIFY)	57a. N/A PPM (VOL)	b. N/A LB/HR	c. Not Applicable

MAXIMUM OPERATION

CONTAMINANT	CONCENTRATION OR EMISSION RATE PER IDENTICAL SOURCE		METHOD USED TO DETERMINE CONCENTRATION OR EMISSION RATE
PARTICULATE MATTER	58a. -0- GR/SCF	b. -0- LB/HR	c. Not A Contaminant
CARBON MONOXIDE	59a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
NITROGEN OXIDES	60a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
ORGANIC MATERIAL	61a. N/A PPM (VOL)	b. 89.1 LB/HR	c. Mass balance with calculation of emission factor and actual weighing of finished product.
SULFUR DIOXIDE	62a. -0- PPM (VOL)	b. -0- LB/HR	c. Not A Contaminant
OTHER (SPECIFY)	63a. N/A PPM (VOL)	b. N/A LB/HR	c. Not Applicable

ITEMS 52 THROUGH 63 NEED NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT. "OTHER" CONTAMINANT SHOULD BE USED FOR AN AIR CONTAMINANT NOT SPECIFICALLY NAMED ABOVE. POSSIBLE OTHER CONTAMINANTS ARE ASBESTOS, BERYLLIUM, MERCURY, VINYL CHLORIDE, LEAD, ETC.

***EXHAUST POINT INFORMATION Through Pollution Control Equipment;

64. FLOW DIAGRAM DESIGNATION(S) OF EXHAUST POINT: Not Applicalble

65. DESCRIPTION OF EXHAUST POINT (LOCATION IN RELATION TO BUILDINGS, DIRECTION, HOODING, ETC.):

66. EXIT HEIGHT ABOVE GRADE:

67. EXIT DIAMETER:

68. GREATEST HEIGHT OF NEARBY BUILDINGS: FT

69. EXIT DISTANCE FROM NEAREST PLANT BOUNDARY: FT

AVERAGE OPERATION

70. EXIT GAS TEMPERATURE: °F

71. GAS FLOW RATE THROUGH EACH EXIT: ACFM

MAXIMUM OPERATION

72. EXIT GAS TEMPERATURE: °F

73. GAS FLOW RATE THROUGH EACH EACH EXIT: ACFM

THIS SECTION SHOULD NOT BE COMPLETED IF EMISSIONS ARE EXHAUSTED THROUGH AIR POLLUTION CONTROL EQUIPMENT.

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER:	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
W.R. MEADOWS INC.	Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:
46W185 Allen Road	Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER:	6. DESIGNATION OF TANK:
Not Known	Tank #41
7. SERIAL NUMBER:	8. CAPACITY:
Not Known	20,000 Gallons
9. TANK USE:	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL:
Storage of Mineral Spirits	1

11. TANK SHAPE: ☐ HORIZONTAL ☒ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER:	13. TANK HEIGHT:	14. TANK LENGTH:
13'6" FT	19'6" FT	N/A FT

15. STATUS:	16. TANK TYPE:
☒ EXISTING ☐ ALTERATION	☐ PRESSURE ☒ FIXED ROOF ☐ FLOATING ROOF ☐ OTHER(SPECIFY)_____
17. SEAL: ☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 5 FT.
19. SHELL TYPE: ☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	20. PAINT COLOR: White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

IL 532 0254
APC 232 (REV. 09/90)

MATERIAL TO BE STORED

25. MATERIAL:	26. DENSITY:	27. VAPOR PRESSURE AT 70°F:
Mineral Spirits	6.4 Pounds/Gallon LB/FT³	2.9 MM Hg PSIA

STORAGE CONDITIONS

28. STORAGE TEMPERATURE: MINIMUM 60 °F MAXIMUM 80 °F

29. TANK TURN OVER PER YEAR: at 19,000 Gal ☐ BBLS/ ☒ GALS/
9 (April to October Only)

30. MAXIMUM FILLING RATE: 5500 ☐ BBLS/DAY ☒ GALS/DAY

31. AVERAGE THROUGHPUT: 1000 (April to October Only) ☐ BBLS/DAY ☒ GALS/DAY

32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO

33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO

34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO

IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER: W. R. MEADOWS INC.	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER): Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE: 46W185 Allen Road	4. CITY OF EMISSION SOURCE: Hampshire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER: Not Known	6. DESIGNATION OF TANK: Tank #42
7. SERIAL NUMBER: Not Known	8. CAPACITY: 20,000 Gallons
9. TANK USE: Mineral Spirits Storage	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL: 1

11. TANK SHAPE: ☒ HORIZONTAL ☐ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER: 12 FT	13. TANK HEIGHT: N/A FT	14. TANK LENGTH: 24 FT

15. STATUS: ☒ EXISTING ☐ ALTERATION	16: TANK TYPE: ☐ PRESSURE ☒ FIXED ROOF ☐ FLOATING ROOF ☐ OTHER(SPECIFY)_____
17. SEAL: ☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID: 2 FT.
19. SHELL TYPE: ☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	20. PAINT COLOR: White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

IL 532 0254
APC 232 (REV. 09/90)

MATERIAL TO BE STORED

25. MATERIAL:	26. DENSITY:	27. VAPOR PRESSURE AT 70°F:
Mineral Spirits	6.49 Pounds/Gallon LB/FT³	2.0 MM Hg PSIA

STORAGE CONDITIONS

28. STORAGE TEMPERATURE: MINIMUM 60 °F MAXIMUM 85 °F	29. TANK TURN OVER PER YEAR: at 19,000 Gal ☐ BBLS/ ☒ GALS/ 9 (April to October Only)
30. MAXIMUM FILLING RATE: 5500 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: 1000 (April to October Only) ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

PROCESS EMISSION SOURCE ADDENDUM TANK	FOR AGENCY USE ONLY

1. NAME OF OWNER:	2. NAME OF CORPORATE DIVISION OR PLANT (IF DIFFERENT FROM OWNER):
W. R. MEADOWS INC.	Hampshire Plant
3. STREET ADDRESS OF EMISSION SOURCE:	4. CITY OF EMISSION SOURCE:
46W185 Allen Road	Hamsphire

TANK INFORMATION

5. NAME OF TANK MANUFACTURER:	6. DESIGNATION OF TANK:
Not Known	Tank #43
7. SERIAL NUMBER:	8. CAPACITY:
Not Known	10,000 Gallons
9. TANK USE:	10. NUMBER OF SAME CAPACITY TANKS STORING SAME MATERIAL:
Mineral Spirits Storage	-0-

11. TANK SHAPE: ☒ HORIZONTAL ☐ CYLINDRICAL ☐ SPHERICAL ☐ OTHER(SPECIFY)_____

12. TANK DIAMETER:	13. TANK HEIGHT:	14. TANK LENGTH:
9.5 FT	N/A FT	20 FT

15. STATUS:	16: TANK TYPE:
☒ EXISTING ☐ ALTERATION	☐ PRESSURE ☒ FIXED ROOF ☐ FLOATING ROOF ☐ OTHER(SPECIFY)_____
17. SEAL:	18. AVERAGE DISTANCE FROM TOP OF TANK SHELL TO LIQUID:
☐ SINGLE ☐ DOUBLE ☒ OTHER (SPECIFY) N/A	2 FT.
19. SHELL TYPE:	20. PAINT COLOR:
☐ RIVETED ☒ WELDED ☐ OTHER(SPECIFY) _____	White

VENT VALVE DATA

TYPE OF VENT	NUMBER OF VENTS	PRESSURE SETTING	DISCHARGE VENTED TO (ATMOSPHERE, FLARE, ETC.)
21. COMBINATION	a.	b. PSIG	c.
22. PRESSURE	a.	b. PSIG	c.
23. VACUUM	a.	b. PSIG	c.
24. OPEN	a. 1	b. Ambient PSIG	c. Atmosphere

MATERIAL TO BE STORED

25. MATERIAL:	26. DENSITY:	27. VAPOR PRESSURE AT 70°F:
Mineral Spirits	6.49 Pounds/Gallon LB/FT³	2.0 MM Hg PSIA

STORAGE CONDITIONS

28. STORAGE TEMPERATURE: MINIMUM 65 °F MAXIMUM 85 °F	29. TANK TURN OVER PER YEAR: at 9,000 Gal. ☐ BBLS/ ☒ GALS/T. 0. 18 April to October Only
30. MAXIMUM FILLING RATE: 5500 ☐ BBLS/DAY ☒ GALS/DAY	31. AVERAGE THROUGHPUT: 1000 April to October Only ☐ BBLS/DAY ☒ GALS/DAY
32. PRESSURE EQUALIZERS USED? ☐ YES ☒ NO	33. PERMANENT SUBMERGED LOADING PIPE USED? ☒ YES ☐ NO
34. VAPOR LOSS CONTROL DEVICE? ☐ YES ☒ NO	IF VAPOR LOSS CONTROL DEVICE IS USED, COMPLETE "DATA & INFORMATION -- AIR POLLUTION CONTROL EQUIPMENT," (FORM APC-260), AS PART OF THIS APPLICATION.

Exhibit 6

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

P. O. Box 19506, Springfield, IL 62794-9506

217/782-2113

CERTIFIED MAIL

PERMIT DENIAL

March 31, 1997

W. R. Meadows, Inc.
Attn: Dave Casey
46W185 Allen Road
Hampshire, Illinois 60140

Application No.:	97010023
I.D. No.:	089045AAL
Applicant's Designation:	006
Received:	February 10, 1997
Construction & Operation of:	Dip Tank Fiber Saturation Unit
Location:	46W185 Allen Road, Hampshire

The Illinois EPA has reviewed your Application for a Joint Construction and Operating Permit for the above referenced project. In accordance with Section 39 of the Illinois Environmental Protection Act (Act), 415 ILCS 5/39 (1994) and 35 Ill. Adm. Code 201.155 and 201.160, the permit application is DENIED because W. R. Meadows, Inc. failed to demonstrate that no violation of the Act or regulations would occur if the permit was granted. The specific provision of the Act that might be violated is Section 9, 415 ILCS 5/9 (1994). The provisions of the regulations that might be violated are 35 Ill. Adm. Code 203.201 and 35 Ill. Adm. Code 218.926.

The following are specific reasons why the Act and the Rules and Regulations may not be met:

This application is identified by the applicant as a joint construction and operating permit for a dip tank fiber saturation unit with a condenser for volatile organic material (VOM) emission control of the saturation unit and for three storage tanks without control. A construction permit has previously been issued for the fiber saturation unit without a condenser (Permit No. 95120221, issued February 22, 1996). This application has been assigned a new number, as it would involve further construction, i.e., a condenser associated with the equipment already addressed by Permit No. 95120221. The emission rate now being requested from both the saturation and the entire process even with the addition of the proposed condenser is much higher (as there is a requested production increase from less than 1,600 pallets per year to over 9,000) than addressed by Permit No. 95120221.

W. R. Meadows has proposed to limit VOM emissions from the fiber saturation unit (dip tank) and storage tanks to under 20.5 ton/yr, to keep the net increase VOM emissions over the past five years under 25 tons/yr in order to not constitute a significant emission increase pursuant to 35 Ill. Adm. Code 203.209(b). (This limit of 20.5 ton/yr was previously established in Permit No. 95120221.) W. R. Meadows has now calculated that this limit would allow for production of a maximum of 3 pallets per hour for 3,100 hours/yr, at an emission rate of 12.9 lb/hr (after installation of a proposed condenser on the saturation unit) or 20.0 ton/yr. W. R. Meadows has excluded what they classify as fugitive emissions from the "curing" of saturated fiber boards, i.e., solvent that evaporates from the boards during a period of approximately four weeks following saturation, until the boards are ready for sale. These curing emissions were included when Permit No. 95120221 was granted.

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1. The applicant stated that this "application deals solely with control of the saturation unit emissions". If the control equipment proposed in this application were only to reduce emissions from an existing emission unit that was in compliance with applicable rules and permit conditions, the Illinois EPA could issue a construction permit. However, this application effectively requests an increase in VOM emissions from curing, due in part to the request for an increase in throughput. Accordingly the application must address not only the portion of the coating line identified as the "saturation unit" but also the "curing process".

2. In the application, as originally submitted on January 2, 1997, W. R. Meadows presented a figure of 0.39 lb/hr of VOM emissions from curing along with controlled VOM emissions of 12.9 lb/hr from the fiber saturation. The 0.39 lb/hr value is the emissions from three pallets (produced in one hour) averaged over a four weeks time period when they are curing. Since there may be hundreds of pallets curing at any given time, emissions from curing must be calculated from an average loss per pallet during the full time period times the number of pallets requested to be produced. From this information, the emissions from curing now being requested would be .39 lb/hr x 24 hr/day x 7 day/week x 4 weeks ÷ 3 = 86.6 lb/pallet.

$$\frac{86.6\ lb}{Pallet} \times \frac{3\ Pallets}{Hour} \times \frac{3,100\ Hours}{Year} \times \frac{Ton}{2,000\ lb} = 402.7\ tons/yr$$

In separate correspondence with the Agency concerning the current permit, W. R. Meadows has argued that the curing emissions are fugitive.

The Illinois EPA does not classify the emissions from curing as fugitive emissions. In particular W. R. Meadows did not show that some or all of these emissions do not or could not reasonably pass through a chimney, vent, or equivalent opening. Even if they classified as fugitive, 35 Ill. Adm. Code 203.206(e) states that in severe nonattainment areas, fugitive emissions shall be included in determining whether it is a major stationary source or major modification. As a result, the board coating line would be a major source even if the proposed condenser provided 100% control of the saturation step. Hampshire is located in a severe nonattainment area.

The application failed to demonstrate that issuance of the permit would not cause a violation of 35 Ill. Adm. Code 203.201. Specifically, the application does not address the following requirements of Part 203, which are applicable to construction of a major source.

a. The application must show that the emission rates from the project(s) represent the Lowest Achievable Emission Rate (LAER) (Section 203.301).

b. The application must provide emission offsets to demonstrate that the project(s) will not interfere with progress in attaining air quality standards (Section 203.302 and 203.303).

c. The application must contain a certification of compliance for other major sources in Illinois owned or operated by the applicant (or by any person controlling or controlled by the applicant) (Section 203.305).

d. The application must contain an analysis of alternatives to the proposed project(s) demonstrating that benefits outweigh its environmental and social costs (Section 203.306).

3. The application does not show that 35 Ill. Adm. Code 218 Subpart PP would not be violated. The saturation and curing of the pallets are miscellaneous fabricated products manufacturing process and VOM emissions must be demonstrated to comply with Section 218.926. If compliance with the 3.5 lb/gal limit of Section 218.926(b)(1) is to be shown, a USEPA Method 24 test will have to be performed on the asphalt/mineral spirits mixture as applied in accordance with 35 Ill. Adm. Code 218.105 and the results submitted with the application.

The Illinois EPA will be pleased to review a reapplication for this permit that includes the necessary information and documentation to correct the deficiencies noted above. In accordance with 35 Ill. Adm. Code 201.152 and 201.157, this reapplication may incorporate by reference the data and information submitted to the Illinois EPA in the original permit application, provided that you certify that the data and information previously submitted remains true, correct and current. The re-application will be considered filed on the date it is received by the Illinois EPA and will constitute a new permit application for purposes of Section 39(a) of the Act. Two copies of this information must be submitted and should reference the application and I.D. numbers assigned above.

If you have any questions, please call Dan Punzak at 217/782-2113.

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

DES:DGP:jar

cc: Region 1
J. Armitage, Enforcement
R. Bulger, Enforcement

Exhibit 7

HOWARD & HOWARD

ATTORNEYS

Established 1869

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RT C. BECK
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NDO A. BORREGO ▾⊏
. BREISACH
Y L. BROWN
E. CARLSON ⊐
T. CARTER
EY P. CHALMERS
D. CHAMBERLAIN
TOPHER A. CHEKAN ▲
EL L. CHOJNOWSKI

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JON S. FALETTO ▪◗
STEPHEN C. FERLMANN ▲
SALLY LEE FOLEY ▿
DAVID J. GASKEY ⊐
JAMES H. GEARY
PAUL GREEN
ROGER M. GROVES ▿
BRUCE R. GRUBB
MICHELE L. HALLORAN
PATRICK D. HANES

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C. DOUGLAS MORAN
LAWRENCE J. MURPHY ‡▪
THEODORE W. OLDS ⊐
SUSAN E. PADLEY
GARY A. PETERS ‡▪●
ROSHUNDA PRICE-HARPER
JEFFREY G. RAPHELSON
BRAD A. RAYLE
BRIAN J. RENAUD
DAVID E. RIGGS
ROBERT C. ROSSELOT ▾▪
BRAD S. RUTLEDGE
LEONARD W. SACHS ▲

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ROBERT L. SCHWARTZ
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JON E. SHACKELFORD ⊐
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THOMAS J. TALLERICO ▿
LAURA A. TALT
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PATRICK R. VAN TIFLIN
SHAMRA M. VANWAGONER
MELANIE MAYO WEST
JAMES C. WICKENS
MYRA L. WILLIS
JOHN E. YOUNG
MARLA G. ZWAS

WILLIAM G. HOWARD
(1846-1906)
HARRY C. HOWARD
(1871-1948)
WILLIAM J. HOWARD
(1904-1993)

ALL ATTORNEYS ADMITTED IN MICHIGAN ONLY, EXCEPT AS INDICATED
▿ ALSO ADMITTED IN DISTRICT OF COLUMBIA
‡ ALSO ADMITTED IN FLORIDA
▪ ALSO ADMITTED IN ILLINOIS
‡ ALSO ADMITTED IN INDIANA
● ALSO ADMITTED IN IOWA
⊜ ALSO ADMITTED IN MINNESOTA
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× ONLY ADMITTED IN FLORIDA
▲ ONLY ADMITTED IN ILLINOIS
⊐ ADMITTED TO PRACTICE BEFORE THE PATENT AND TRADEMARK OFFICE

Via Federal Express **October 29, 1996**

Julie K. Armitage, Esq.
Associate Counsel
Air Enforcement
Division of Legal Counsel
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

Re: W.R. Meadows, Inc. Hampshire Facility - Previous Operating Permits for Asphalt Saturation Process

Dear Ms. Armitage:

In followup to our recent telephone conversation, I asked Dave Carey of W.R. Meadows, Inc. to provide us with historical information about the past operations at the Hampshire facility. You had indicated during our conversation that one of the agency permit engineers believed W.R. Meadows had operated a fiberboard asphalt saturation process at this location at some time in the past. Dave Carey confirms that Meadows was previously permitted by IEPA to conduct its asphalt saturation manufacturing operations at the Hampshire location. Mr. Carey has provided the permitting documentation for those manufacturing operations.

The permitting documentation should provide for expeditious resolution of this matter, particularly the fugitive emissions question. As you will note from your review of the permit

documents, IEPA has previously determined that the emissions from the asphalt fiberboard storage areas are "fugitive" emissions. We are now enclosing the following permitting documents:

- Letter dated November 25, 1987 from W.R. Meadows, Inc. to IEPA permit engineer Dan Hanko forwarding the permit application for the dip tank asphalt saturation manufacturing facilities to be constructed and operated at the Hampshire site. (Review of the equipment and process description contained in the letter illustrates that the former equipment, raw materials and manufacturing process are virtually identical to the equipment, raw materials and process currently employed at Meadows' Hampshire facility.);

- Joint Construction and Operating Permit No. 87120005 issued to W.R. Meadows, Inc. on February 23, 1988 authorizing construction and operation of its asphalt-impregnated fiberboard expansion joint manufacturing process; and

- Renewal of Joint Construction and Operating Permit No. 87120005 from November 1989, which extended the effective period of the Permit to January 31, 1995; and

- Approval dated February 3, 1992, of the withdrawal of Joint Construction and Operating Permit No. 87120005.

In 1988, Meadows received Joint Construction and Operating Permit No. 87120005 from IEPA authorizing construction and operation of its asphalt-impregnated fiberboard expansion joint manufacturing process at the Hampshire facility. In 1992 after receiving IEPA approval, Meadows dismantled the equipment used in the expansion joint manufacturing operations and reconstructed that equipment at its Austell, Georgia property. The equipment, raw materials and manufacturing process authorized by prior Permit No. 87120005 are virtually identical to the equipment, raw materials and process currently utilized at Meadows' Hampshire facility pursuant to existing Permit No. 95120221.

We direct your attention to Special Condition No. 1b(ii) of prior Operating Permit No. 87120005 which states:

> ii. This limit does not include an estimated 27.6 tons/year of fugitive emissions. **The estimate of fugitive emissions is based on detailed information on loss of volatile organic material during outside storage**

and drying, and the maximum operating rate and operating hours of the dip tank provided in the permit application.

The Illinois Environmental Protection Agency has previously determined that the "...loss of volatile organic material during outside storage and drying" of the saturated fiberboards is properly characterized as fugitive emissions. As we have discussed, Meadows believes that the Illinois regulations, federal regulations and Illinois case law dictate that result.

In addition to documenting IEPA's previous permit determination that emissions from the fiberboard storage areas are "fugitive emissions," the historical permitting information sheds light on the factual basis for the regulations at 35 IAC Section 218.920-218.928, Subpart PP "Miscellaneous Fabricated Product Manufacturing Process," and related definitions set forth at 35 IAC Part 211, Subpart B which are incorporated by express reference into Part 218. The manufacturing processes covered by Subpart PP include the application of "...asphalt solutions to paper or fiberboard" including "drying and curing" of those formulations. Since Meadows was operating its asphalt fiberboard saturation process at the Hampshire facility in 1988, which is when the Subpart PP standards were first promulgated and to Meadows' knowledge was the only company engaged in this manufacturing process in Illinois, it is almost certain that the agency was considering Meadows' manufacturing operations when it developed and promulgated the Subpart PP standards.

For those sources covered by Subpart PP, the control requirements for "coating lines" is a limitation of 3.5 pounds of VOM per gallon of coating (lbs. VOM/gallon) applied to the fiberboard. [35 IAC 218.926(b)] The definition of "coating line" for the Part 218 standards includes "...any associated flash-off areas, drying areas, and ovens, wherein a coating would be applied, dried and/or cured." Arguably, Meadows is required only to comply with the 3.5 lb VOM/gallon limitation on the asphalt blend it utilizes to be in full compliance with Subpart PP, for the saturator unit and the fiberboard storage areas.

In summary, the enclosed documentation confirms that the IEPA has already determined that the VOM emissions from Meadows' fiberboard storage areas are "fugitive" emissions. That previous determination was adopted during development of the Subpart PP standards which address fugitive emissions in the only plausible way; by limiting the VOM-content of the coating compounds used in the manufacturing process.

As previously stated, Meadows is prepared to install VOM emissions controls on the asphalt saturator emission unit to maintain point source emissions below the 25 ton/year major source threshold. Furthermore, Meadows will agree to limit the VOM-content of its asphalt blend to the Subpart PP limitation of 3.5 lb. VOM/gallon of coating to minimize the amount of fugitive emissions from the fiberboard storage areas.

We believe that Meadows is proposing a reasonable solution which fully complies with all applicable requirements. We hope that IEPA will concur so that both sides can avoid additional unnecessary litigation and administrative costs. Once you have had an opportunity to review the enclosed documentation, please contact me to discuss an amicable and expeditious resolution of this matter.

Sincerely,

HOWARD & HOWARD

Jon S. Faletto

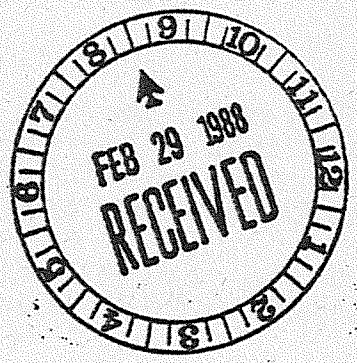
Enclosure
cc: Donald Sutton, P.E.
Joseph E. Svoboda, Esq.
Richard F. Bulger, Esq.
John Schmidt, Esq.
Dave Carey

\pkp\p326\meadows\ja10-28.ltr

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-2113

JOINT CONSTRUCTION AND OPERATING PERMIT



PERMITTEE

W.R. Meadows, Inc.
Attention: Henry A. Cobo
Allen Road
Hampshire, Illinois 60140

Application No.: 87120005
I.D. No.: 089045AAL
Applicant's Designation:
Date Received: December 1, 1987
Subject: Asphalt Saturation of Fiber Board
Date Issued: February 23, 1988
Operating Permit Expiration Date: January 31, 1990

Location: Allen Road, Hampshire

Permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission source(s) and/or air pollution control equipment consisting of dip tank saturator and pallet storage as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. i. The dip tank shall operate, that is, actually process sheets, for no more than 2160 hours/year.

ii. The saturating operation shall consume no more than 1,690 tons of volatile organic material solvent, i.e. mineral spirits, per year.

iii. Compliance with these limits shall be determined from a running total of 12 months of data.

b. i. Emissions of volatile organic material directly from the operation of the dip tank, shall not exceed 10 lb/hour, and 10.8 tons/year.

ii. This limit does not include an estimated 27.6 tons/year of fugitive emissions. The estimate of fugitive emissions is based on detailed information on loss of volatile organic material during outside storage and drying, and the maximum operating rate and operating hours of the dip tank provided in the permit application.

iii. This permit is issued based upon a minimal hourly emission rate and negligible annual emissions (less than 0.1 ton/year) of volatile organic material from emission points, not accounted for above.

c. The terms of the above conditions may be superseded by new or revised conditions in future construction or operating permits upon a determination by the Agency that the new or revised conditions provide equivalent limits on emissions of volatile organic material.

2a. The Permittee shall maintain records of operating hours and volatile organic material solvent use, on at least a monthly basis.

b. The Permittee shall maintain normal operating records related to the volatile organic material content of asphalt board.

c. These records shall be retained for at least 2 years and shall be available for inspection by the Agency.

3a. Prior to April 1, 1989, the Permittee shall submit an analysis of the distribution of volatile organic material losses from the various steps in this operation, using material balance, laboratory analysis and other methods.

b. At the written request of the Agency the Permittee shall

i. Propose methods for further measurement of emissions from particular steps in this operation, for approval by the Agency, and

ii. Conduct measurements in accordance with the method approved by the Agency.

4. This permit is issued upon this operation not constituting a major new source or major modification for emissions of volatile organic material, so that it not subject to 35 Ill. Adm. Code Part 203, Subpart C.

It should be noted that the Illinois Pollution Control Board is presently considering a new regulation for "generic sources" of volatile organic material, R86-18. The present proposal would apply to certain emission sources at plants with 100 tons/year of volatile organic material emission in the absence of air pollution control equipment, not yet subject to limits which reflect Reasonable Available Control Technology. In the event a rule is adopted to which this equipment is subject, it will be necesary to comply with its requirements in the manner and schedule specified by the rule.

Terry A. Sweitzer

Terry A. Sweitzer, P.E.
Manager, Permit Section
Division of Air Pollution Control

TAS:DMH:ds:4636H/1-2

cc: Region 1

W. R. MEADOWS, INC.
P.O. BOX 543 • ELGIN, ILLINOIS 60121
SEALTIGHT®
TELEPHONE: 312-683-4500
CHICAGO: 626-3112

November 25, 1987

State of Illinois
Environmental Protection Agency
Division of Air Pollution Control
2200 Churchill Road
Springfield, IL 67206

Attention: Mr. Dan Hanko

Dear Dan:

Per my telephone conversation with the Permit Section, I have completed APC Forms 200 and 220 as instructed. The Dip Tank Saturator is a proprietary process, developed by W. R. MEADOWS, INC. This company would appreciate this information (formulas, equipment specification and production capabilities) labeled and handled in a proprietary manner.

The Dip Tank Saturator is a forty-eight (48) foot long, six (6) foot wide by one (1) foot deep tank designed to impregnate a fibrous cellulose sheet (1/2" x 48" x 10") with an asphalt solution. The asphalt impregnated board is known in the construction industry as fibre joint or expansion joint filler, and is made to meet the following specifications: ASTM D 1751, Federal HH-F-341F Type I, AASHTO M 213, Corps of Engineers CRD-C 508, and FAA Item P-610-2.7. These specifications include asphalt content and uniformity, compression, recovery, moisture absorption, etc. It is a necessity in streets, highways, sidewalks and building construction.

W. R. MEADOWS for the last nine (9) years has operated a vacuum saturator dip tank system to provide the construction industry with the above product. The permit number 78090047 was issued to the Hampshire plant in 1978 to operate four (4) vacuum units. The units have physical limitations that control the production rate. Therefore in 1983, W. R. MEADOWS submitted a permit application to operate a non-vacuum saturator system to fill the production rate void. The permit section denied the permit and this company did not pursue the matter. The emission calculations accompanying the application were based upon laboratory testing and the uses of a small model saturator. The calculation was not based on actual emission, no consideration was given to the absorption and retention properties of the fibre board. The permit section has recently informed me of the accepted thought on the solvent retention capabilities of paper (fibrous cellulose). The agency permits the printing industry twenty-five percent (25%) solvent retention for their processes on a thin media. We believe the solvent retention capabilities of fibre board are much greater, our data indicates seventy-five (75) to seventy-nine (79) percent retention.

W. R. MEADOWS, INC. has operated an identical dip tank process at our Goodyear, Arizona plant since early 1983. The process utilizes the same raw materials and operates as the proposed process would. The solvent loss data was gathered at the Goodyear plant, initially. Once this data was evaluated, the Hampshire plant conducted three separate tests to confirm and compare the results. The results of the test confirmed the following discussion on the actual solvent retention that takes place. The Goodyear data did demonstrate a faster weight stabilization of the saturated board. We concluded that the higher ambient temperature in Arizona contributed to the accelerated loss. However, the actual solvent retention did not decrease because of the accelerated stabilization.

The process utilizes three separate components to provide a stable uniform final product complying with the construction specification. The board is manufactured from the plant residue left after the juice has been extracted from the sugarcane plant called "bagasse". The plant residue composed of long fibrous bundles is blended with paper pulp in a slurry system to form a dense microscopic continuous capillary system of cane and cellulose. The average fibrous cellulose board weighs nineteen pounds (19 lbs.1/2" x 36" x 10') and has a four percent (4%) moisture content.

The second component is asphalt, used as the saturant of the raw board in the dip tank. The asphalt is a previously air blown asphalt that inherently produces very low emissions or none at all. The softening point temperature of this asphalt (105 degrees to 107 degrees F.) permits the process to operate at a relatively low temperature of 125 degrees F., further reducing emission potential. The asphalt is maintained at this temperature to assist the capillary action responsible for the penetration process. As the asphalt's temperature reaches or drops below the softening point, a quick crusting effect commences on the edges of the board. The crusting effect plays a role in the retention of the volatile portion of the final product.

The third component, a Rule 66 type mineral spirits is used as the second member of the mechanism assisting the penetration of the raw board by the asphalt. The solvent's low aromatic content (less than 7.5%) and a low vapor pressure (0.4 PSI Reid V.P.) provides a complementary evaporation rate to facilitate complete impregnation. The low aromatic content and the low vapor pressure properties classifies this solvent as a non-photochemically reactive material. The slow evaporation rate also contributes to the eventual solvent retention within the asphalt impregnated fibrous cellulose.

The process commences with a raw board inserted at one end of the dip tank. The dip tank holds 1500 gallons of a sixty percent (60%) asphalt, forty percent (40%) mineral spirits Rule 66, at a constant temperature of 125 degrees F. The amount of asphalt in the saturant solution has been increased to its maximum and still

allows penetration to occur in a uniform manner. Ideally, straight asphalt would be used if possible. Complete uniform penetration with this method only occurs after a period of time because of the presence of the solvent. Heat is provided via a hot oil exchange system, located below the dip tank unit. The tank is fully enclosed except for the admitting and exiting slots. Rollers are provided in the tank prior to exiting to squeeze excess asphalt solution from the board. A partially saturated board exits the dip tank every eighteen seconds (18), complete saturation occurs within twenty-four hours (24) or less. The capillary action of the fibrous cellulose material occurs quicker during the warmer months.

The Hampshire operating procedure will duplicate the Arizona plants operating procedure. The process requires that a previously saturated and dried board (10 days old) be used as the bottom and top board. Seventy three (73) saturated boards are stacked on top of the previously dried board, with the seventy-fifth (75th) board, another dried board placed on top. This capping method reduces the surface area available for solvent loss and aids in the heat retention of the pallet. The pallet will then be stored outside for a period of ten (10) to fifteen (15) days before shipment.

The emission calculations accompanying this permit application are based on actual operating conditions. The data was compiled by weighing three (3) different pallets over a thirty (30) day period. The first pallet was weighed in May, the second one in July and the third in September.

Thank you for your assistance. If you should have any questions feel free to contact me at 312/683-4500 extension 236.

Sincerely,

W. R. MEADOWS, INC.

Henry A. Cobo

Henry A. Cobo
Environmental Specialist

HAC:mt
Enclosures

Illinois Environmental Protection Agency 1990 P.O. Box 19276, Springfield, IL 62794-9276

MAR 1 RECEIVED

AUG 28 RECEIVED

APPLICATION FOR PERMIT RENEWAL/OPERATING PERM

AUGUST 05, 1989

APPLICATION NO: 71200
ID NUMBER: 089080AIL
OPERATION OF:
ASPHALT SATURATION OF FIBER BOARD

W. R. MEADOWS
ATTN: HENRY A. COBO
2 KINGALL STREET
ELGIN IL 60120

LOCATION:
W R MEADOWS, INC
ALLEN ROAD
HAMPSHIRE IL 60140

THE ABOVE REFERENCED OPERATING PERMIT WILL EXPIRE ON JANUARY 31, 1990. THE AGENCY RECOMMENDS THAT YOU APPLY FOR A RENEWAL OF THIS OPERATING PERMIT AT LEAST NINETY (90) DAYS PRIOR TO ITS EXPIRATION.

IF YOUR OPERATION IS UNCHANGED, YOU MAY REQUEST TO RENEW YOUR PERMIT BY SIGNING IN THE SPACE PROVIDED BELOW, KEEPING ONE COPY FOR YOUR RECORDS, AND RETURNING THIS CORRESPONDENCE TO THE AGENCY. IF DATED AND SIGNED BY THE AGENCY THIS APPLICATION WILL BE RETURNED TO YOU AND WILL BE YOUR PERMIT.

IF THERE HAS BEEN A CHANGE OF ADDRESS, PLEASE INDICATE THIS BY CORRECTING THE ABOVE INFORMATION. IF THERE HAS BEEN A CHANGE OF OWNERSHIP, PROPER DOCUMENTATION MUST BE SUBMITTED TO ALLOW TRANSFER OF PERMIT(S). IF YOUR OPERATION HAS CHANGED FROM THAT DESCRIBED IN THE PREVIOUS APPLICATION FILED WITH THIS AGENCY, THEN YOU MUST USE APPROPRIATE FORMS TO DESCRIBE ALL CHANGES AS PART OF THE APPLICATION. (SEE ENCLOSED 'REQUEST FOR PERMIT FORMS' APC-209).

RECEIVED
NOV 06 1989
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
STATE OF ILLINOIS

IF THE OPERATION HAS BEEN PERMANENTLY DISCONTINUED, PLEASE SEND A LETTER TO THE AGENCY WITHDRAWING THIS PERMIT. IF THE EMISSION POINT IS INCLUDED IN ANOTHER PERMIT, PLEASE PROVIDE THE PERMIT NUMBER(S) AND A LETTER OF EXPLANATION.

I CERTIFY THAT THE ORIGINAL PERMIT INFORMATION REMAINS TRUE, CORRECT, AND CURRENT AND THAT I AM AUTHORIZED TO EXECUTE THIS APPLICATION FOR PERMIT RENEWAL.

Henry A. Cobo 11/1/89 Henry A. Cobo Envir Specialist

SIGNATURE DATE PRINTED NAME AND TITLE OF SIGNER

FOR AGENCY USE ONLY

PERMIT EXPIRATION DATE: JANUARY 31, 1995

PERMIT IS GRANTED TO OPERATE THE ABOVE REFERENCED EQUIPMENT SUBJECT TO STANDARD CONDITIONS ATTACHED HERETO AND ANY SPECIAL CONDITIONS OF THE PREVIOUSLY GRANTED OPERATING PERMIT.

Terry Sweitzer /pee

TERRY SWEITZER, P.E.
MANAGER, PERMIT SECTION
DIVISION OF AIR POLLUTION CONTROL

CC: REGION 1??

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-2113

February 3, 1992

FEB 6 1992
RECEIVED

W.R. Meadows, Inc.
Attn: Dave Carey, Env. Spec.
2 Kimball Street
Elgin, IL 60120

Application No.:	87120005
I.D. No.:	089045AAL
Operation of:	Asphalt Saturation of Fiber Board
Letter Dated:	July 24, 1991

The Agency hereby acknowledges the receipt of your above-referenced letter and confirms the withdrawal of your Operating permit in accordance with your request.

If you have any questions concerning this matter, please contact Betty Ascher at 217/782-2113.

Donald E. Sutton

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

DES:mab/1000M/sp/78

cc: Region 1

l. Adm. Code 218.100 or 79 degrees fahrenheit for the Metro-East nonattainment area as defined at 35 Ill. Adm. Code 19.100 for VOLs stored at the ambient temperature, as determined:

In accordance with methods described in American Petroleum Institute bulletin 2517, Evaporation Loss from External Floating Roof Tanks, incorporated by reference at 35 Ill. Adm. Code 218.112 and 219.112; or

By ASTM Method D2879-83, incorporated by reference at 35 Ill. Adm. Code 218.112(a)(1) and 219.112(a)(1).

(Source: Added at 18 Ill. Reg. 16929, effective November 15, 1994)

Section 211.3710 Metal Furniture

"Metal furniture" means a furniture piece including, but not limited to, tables, chairs, waste baskets, beds, desks, lockers, benches, shelving, file cabinets, lamps, and room dividers made in whole or in part of metal.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.3730 Metal Furniture Coating

"Metal furniture coating" means any protective, decorative or functional coating applied onto the surface of any metal furniture or any metal part which will be assembled with other metal, wood, fabric, plastic or glass parts to form metal furniture. However, an adhesive is not a metal furniture coating.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.3750 Metal Furniture Coating Line

"Metal furniture coating line" means a coating line in which any protective, decorative, or functional coating is applied onto the surface of any metal furniture or any metal part which will be assembled with other metal, wood, fabric or glass parts to form metal furniture. However, application of an adhesive is not a metal furniture coating line or part of a metal furniture coating line.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.3770 Metallic Shoe-Type Seal

"Metallic shoe-type seal" means a primary or secondary seal constructed of metal sheets (shoes) which are joined together to form a ring, springs or levers which attach the shoes to the floating roof and hold the shoes against the tank wall, and a coated membrane which is suspended from the shoes to the floating roof.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.3790 Miscellaneous Fabricated Product Manufacturing Process

"Miscellaneous fabricated product manufacturing process" means:

A manufacturing process involving one or more of the following applications, including any drying and curing of formulations, and capable of emitting VOM:

Adhesives to fabricate or assemble parts or products;

Asphalt solutions to paper or fiberboard;

Asphalt to paper or felt;

Coatings or dye to leather;

Coatings to plastic;

Coatings to rubber or glass;

Disinfectant material to manufactured items;

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.1150 Closed Vent System

"Closed vent system" means a system that is not open to the atmosphere and is composed of piping, connections, and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to a control device.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.1170 Coal Refuse

"Coal refuse" means waste products of coal mining, cleaning and coal preparation operations containing coal, matrix material, clay and other organic and inorganic material.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.1190 Coating

a) "Coating" means, for purposes of 35 Ill. Adm. Code 215, a material applied to a substrate for decorative, protective or other functional purposes. Such material shall include, but are not limited to paints, varnishes, sealers, adhesives, diluents and thinners.
b) "Coating" means, for purposes of 35 Ill. Adm. Code 218 and 219, a material applied onto or impregnated into a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealers, adhesives, thinners, diluents, and inks.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.1210 Coating Applicator

"Coating applicator" means equipment used to apply a coating.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.1230 Coating Line

a) "Coating line" means, for purposes of 35 Ill. Adm. Code 215, an operation where a surface coating is applied to a material and subsequently the coating is dried and/or cured.
b) "Coating line" means, for purposes of 35 Ill. Adm. Code 218 and 219, an operation consisting of a series of one or more coating applicators and any associated flash-off areas, drying areas, and ovens wherein a coating is applied, dried, and/or cured. A coating line ends at the point where the coating is dried or cured, or prior to any subsequent application of a different coating. It is not necessary for an operation to have an oven or a flash-off area in order to be included in this definition.

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

Section 211.1250 Coating Plant

"Coating plant" means any building, structure or installation that contains a coating line and which is located on one or more contiguous or adjacent properties and which is owned or operated by the same person (or by persons under common control).

(Source: Added at 17 Ill. Reg. 16504, effective September 27, 1993)

7) A written declaration stating whether the source is complying with this Subpart by using coatings that comply with the applicable VOM content limits in Section 218.780 of this Subpart or by control equipment as specified in Section 218.782; and
8) A description of any control devices used to comply with Section 218.782 of this Subpart and the date(s) the device was installed and became operational.

b) At least 30 calendar days before changing the method of compliance to or from Sections 218.780 and 218.782, the owner or operator of a motor vehicle refinishing operation shall notify the Agency and certify that the source is in compliance with the applicable requirements for the new method of compliance.

(Source: Added at 19 Ill. Reg. 6848, effective May 9, 1995)

Section 218.875 Applicability of Subpart BB (Renumbered)

(Source: Renumbered to Section 218.640 at 17 Ill. Reg. 16636, effective September 27, 1993)

Section 218.877 Emissions Limitation at Polystyrene Plants (Renumbered)

(Source: Renumbered to Section 218.642 at 17 Ill. Reg. 16636, effective September 27, 1993)

Section 218.879 Compliance Date (Repealed)

(Source: Repealed at 17 Ill. Reg. 16636, effective September 27, 1993)

Section 218.881 Compliance Plan (Repealed)

(Source: Repealed at 17 Ill. Reg. 16636, effective September 27, 1993)

Section 218.883 Special Requirements for Compliance Plan (Repealed)

(Source: Repealed at 17 Ill. Reg. 16636, effective September 27, 1993)

Section 218.886 Emissions Testing (Renumbered)

(Source: Renumbered to Section 218.644 at 17 Ill. Reg. 16636, effective September 27, 1993)

SUBPART PP: MISCELLANEOUS FABRICATED PRODUCT MANUFACTURING PROCESSES

Section 218.920 Applicability

a) Maximum theoretical emissions:
1) A source is subject to this Subpart if it contains process emission units not regulated by Subparts B, E, F (excluding Section 218.204(l)), H (excluding Section 218.405), Q, R, S, T, (excluding Section 218.486) V, X, Y, Z or BB of this Part, which as a group both:
A) Have maximum theoretical emissions of 90.7 Mg (100 tons) or more per calendar year of VOM, and
B) Are not limited to less than 90.7 Mg (100 tons) of VOM emissions per calendar year in the absence of air pollution control equipment, through production or capacity limitations contained in a federally enforceable permit or a SIP revision.
2) If a source is subject to this Subpart as provided above, the requirements of this Subpart shall apply to a source's miscellaneous fabricated product manufacturing process emission units which are not included within any of the categories specified in Subparts B, E, F, H, Q, R, S, T, V, X, Y, Z, AA, or BB of this Part.

b) Potential to emit:
   1) A source is subject to this Subpart if it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from emission units that are:
      A) Not regulated by Subparts B, E, F, H, Q, R, S, T (excluding Section 218.486), V, X, Y, Z, or BB of this Part, or
      B) Not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.
   2) If a source is subject to this Subpart as provided above, the requirements of this Subpart shall apply to a source's miscellaneous fabricated product manufacturing process emission units, which are:
      A) Not included within any of the categories specified in Subparts B, E, F, H, Q, R, S, T, V, X, Y, Z, AA, BB, CC, or DD of this Part, or
      B) Not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.

c) If a source ceases to fulfill the criteria of subsections (a) and/or (b) above, the requirements of this Subpart shall continue to apply to a miscellaneous fabricated products manufacturing process emission unit which was subject to the control requirements of Section 218.926 of this Part.

d) No limits under this Subpart shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 0.91 Mg (1.0 ton) per calendar year if the total emissions from such emission units not complying with Section 218.926 of

e) this Part does not exceed 4.5 Mg (5.0 tons) per calendar year, provided that this provision shall not apply to an emission unit which is a leather coating line or operation at a source where the criteria of Section 218.920(a) above are not met.

f) For the purposes of this Subpart, an emission unit shall be considered regulated by a Subpart if it is subject to the limits of that Subpart. An emission unit is considered not regulated by a Subpart if it is not subject to the limits of that Subpart, e.g., the emission unit is covered by an exemption in the Subpart or the applicability criteria of the Subpart are not met.

g) For the purposes of this Subpart, VOM emissions in the absence of air pollution control equipment are the emissions of VOM which would result if no air pollution control equipment were used.

h) The control requirements in Subpart PP shall not apply to sewage treatment plants; vegetable oil extraction and processing; coke ovens (including by-product recovery plants); fuel combustion units; bakeries; barge loading facilities; jet engine test cells; production of polystyrene foam insulation board including storage and extrusion of scrap where blowing agent is added to the polystyrene resin at the source, but not including blending and preliminary expansion of resin prior to molding where blowing agent is incorporated into the polystyrene resin by the producer of the resin; production of polystyrene foam packaging not including blending and preliminary expansion of resin prior to molding where blowing agent is incorporated into the polystyrene resin by the producer of the resin and not including storage and extrusion of scrap where blowing agent is added to the polystyrene resin at the source; and iron and steel production.

(Source: Amended at 18 Ill. Reg. 16392, effective October 25, 1994)

Section 218.923 Permit Conditions (Repealed)

(Source: Repealed at 18 Ill. Reg. 1994, effective January 24, 1994)

Section 218.926 Control Requirements

Every owner or operator of miscellaneous fabricated product manufacturing process emission unit subject to this Subpart shall comply with the requirements of subsection (a), (b) or (c) of this Section:

a) Emission capture and control techniques which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit; or (Board Note: For the purpose of this provision, an emission unit is any part or activity at a source of a type that by itself is subject to control requirements in other Subparts of this Part or 40 CFR 60, incorporated by reference in Section 218.112, e.g., a coating line, a printing line, a process unit, a wastewater system, or other equipment, or is otherwise any part or activity at a source.)

b) For coating lines:
1) The daily-weighted average VOM content shall not exceed 0.42 kg VOM/l (3.5 lbs VOM/gal) of coating as applied (minus water and any compounds which are specifically exempted from the definition of VOM) during any day. Owners and operators complying with this limitation are not required to comply with Section 218.301 of this Part; or
2) For application of coatings to leather at a source where the criteria of Section 218.290(a) are not met:
A) For application of stain coating to leather, other than specialty leather, either
i) The VOM contained in stain coatings, other than stain coatings applied to specialty leather, as applied at the source in any consecutive 12-month period shall not exceed 10 tons; or
ii) The application of stain coatings shall comply with Section 218.926(b)(2)(C) below; or
B) For application of coatings to specialty leather, the total VOM content of all coatings, including stains, as applied to a category of specialty leather, shall not exceed 38 lbs per 1000 square feet of such specialty leather produced, determined on a monthly basis:

$$C = E/A$$

Where:

C = The VOM contained in all coatings applied to a category of specialty leather in units of lbs/square feet;

E = The total VOM content of all coatings applied to the category of specialty leather during each month in units of lbs determined as the sum of the VOM content of each coating applied during the month to such leather;

A = The total area of the category of specialty leather produced in the month in units of square feet, determined as the sum of the area of each type of leather item produced during the month based on the number of such items produced and the area of such item, measured or established in accordance with procedures set in a federally enforceable permit; or

C) For application of coatings to leather, except for such coatings as are complying by means of Section 218.926(b)(2)(A) or (B) above, either
i) The VOM content of each coating shall not exceed 0.42 kg VOM/l (3.5 lbs VOM/gal) of coating as applied (minus water and any compounds which are specifically exempted from the definition of VOM). Owners and operators complying with this limitation are not subject to Section 218.301 of this Part; or
ii) The daily-weighted average VOM content shall not exceed 0.42 Kg Vom/l (3.5 lbs Vom/gal) of coating as applied as provided in Section 218.916(b)(1) above; or

c) An equivalent alternative control plan which has been approved by the Agency and the USEPA in federally enforceable permit or as a SIP revision.

(Source: Amended at 18 Ill. Reg. 1945, effective January 24, 1994)

Section 218.927 Compliance Schedule

Every owner or operator of an emission unit subject to the control requirements of this Subpart shall comply with the requirements thereof on and after a date consistent with Section 218.106 of this Part.

(Source: Amended at 17 Ill. Reg. 16636, effective September 27, 1993)

Section 218.928 Testing

a) When in the opinion of the Agency it is necessary to conduct testing to demonstrate compliance with Section 281.926, the owner or operator of a VOM emission unit subject to the requirements of this Subpart shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in Section 218.105.

b) Nothing in this Section shall limit the authority of the USEPA pursuant to the Clean Air Act, as amended, to require testing.

(Source: Amended at 17 Ill. Reg. 16636, effective September 27, 1993)

SUBPART QQ: MISCELLANEOUS FORMULATION MANUFACTURING PROCESSES

Section 218.940 Applicability

a) Maximum theoretical emissions:
   1) A source is subject to this Subpart if it contains process emission units not regulated by Subparts B, E, F (excluding Section 218.204(l)), H (excluding Section 218.405), Q, R, S, T (excluding Section 218.486), V, X, Y, Z or BB of this Part, which as a group both:
      A) Have maximum theoretical emissions of 90.7 Mg (100 tons) or more per calendar year of VOM, and
      B) Are not limited to less than 90.7 Mg (100 tons) of VOM emissions per calendar year in the absence of air pollution control equipment through production or capacity limitations contained in a federally enforceable permit or a SIP or FIP revision.
   2) If a source is subject to this Subpart as provided above, the requirements of this Subpart shall apply to a source's miscellaneous formulation manufacturing process emission units which are not included within any of the categories specified in Subparts B, E, F, H, Q, R, S, T, V, X, Y, Z, AA, or BB of this Part.

b) Potential to emit:
   1) A source is subject to this Subpart if it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from emission units that are:
      A) Not regulated by Subparts B, E, F, H, Q, R, S, T (excluding Section 218.486), V, X, Y, Z, or BB of this Part, or
      B) Not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.
   2) If a source is subject to this Subpart as provided above, the requirements of this Subpart shall apply to a source's miscellaneous formulation manufacturing process emission units which are:
      A) Not included within any of the categories specified in Subparts B, E, F, H, Q, R, T, V, X, Y, Z, AA, BB, CC, or DD of this Part, or
      B) Not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.

c) If a source ceases to fulfill the criteria of subsections (a) and/or (b) above, the requirements of this Subpart shall continue to apply to a miscellaneous formulation manufacturing process emission unit which was subject to the control requirements of Section 218.946 of this Part.

d) No limits under this Subpart shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 2.3 Mg (2.5 tons) per calendar year if the total emissions from such emission units not complying with this Section does not exceed 4.5 Mg (5.0 tons) per calendar year.

e) For the purposes of this Subpart, an emission unit shall be considered regulated by a Subpart if it is subject to the limits of that Subpart. An emission unit is considered not regulated by a Subpart if it is not subject to the limits of that Subpart, e.g., the emission unit is covered by an exemption in the Subpart or the applicability criteria of the Subpart are not met.

f) For the purposes of this Subpart, VOM emissions in the absence of air pollution control equipment are the emissions of VOM which would result if no air pollution control equipment were used.

g) The control requirements in Subpart QQ shall not apply to sewage treatment plants; vegetable oil extraction and processing; coke ovens (including by-product recovery plants); fuel combustion units; bakeries; barge loading facilities; jet engine test cells; production of ploystyrene foam insulation board including storage and extrusion of scrap where blowing

Exhibit 8

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(1846-1906)
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(1871-1946)
WILLIAM J. HOWARD
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ALL ATTORNEYS ADMITTED IN MICHIGAN ONLY EXCEPT AS INDICATED
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Via Federal Express

September 17, 1996

Julie K. Armitage, Esq.
Associate Counsel
Air Enforcement
Division of Legal Counsel
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

Re: Fugitive Emissions from W. R. Meadows' Hampshire Facility

Dear Ms. Armitage:

On behalf of W. R. Meadows, Inc., we thank you for the opportunity afforded to us on August 30, 1996, to meet and discuss resolution of potential non-compliance issues associated with the Hampshire facility. At that meeting, we also discussed the permitting status of the facility and the possibility that fugitive emissions from the saturated board storage areas have been improperly incorporated as point source emissions into the status determination for the facility.

As we agreed during the meeting, Meadows is providing factual, regulatory and engineering information to demonstrate the fugitive nature of those emissions. Due to the critical nature of this threshold issue, you indicated that upper level officials within IEPA's Bureau of Air would be involved in making this regulatory decision, including Mr. Don Sutton, Manager for the Permits Section, Mr. Dave Kolaz, Manager for the Air Systems Management Section, and possibly the Division Manager. Mr. Joseph E. Svoboda, General Counsel for the agency, also will participate in this decisionmaking process since it will determine the legal basis and outcome

for any potential compliance action. You agreed that the Agency could complete its review and make a decision on the "fugitive emissions" issue by September 30th.

We have attempted to fully describe the asphalt saturation manufacturing process to provide a better understanding of the amount of land area devoted to the storage of boards during the approximate four week "wicking" period. An on-site visit, however, would provide the best method to understand the size of the storage acreage involved. In lieu of an on-site visit, you may want to consult with Martin Tippin and other inspectors from the Maywood District Office who are familiar with the Hampshire facility.

W.R. Meadows continues to believe that the emissions from the saturated boards fall squarely with the definition of "fugitive emissions" set forth in the applicable regulations at Section 203.124. The original construction permit issued for Meadows' Hampshire facility should have addressed that regulatory status and therefore, the permit conditions restricting material usage or operating hours would maintain VOM emissions from the saturator unit to below the major source threshold. Meadows is prepared to submit its application for a minor source operating permit (or an application for modification of the construction permit if the agency determines this step is required), as soon as a determination is made that emissions from the saturated boards are fugitive.

You should be aware that Meadows is investigating the feasibility of installing VOM emissions controls on the saturation process which would provide a substantial reduction (estimated 90 percent) of the point source emissions. Technologies under consideration include condensation and recovery, chemical oxidation and thermal destruction/incineration. We are also monitoring Celotex Corporation's efforts to restart its asphalt fiberboard manufacturing process, which would allow Meadows to substantially curtail operations at the Hampshire facility.

We thank you for this opportunity to submit the enclosed information and believe it demonstrates the "fugitive" status of VOM emissions during storage of the saturated boards. If there are any questions regarding this submittal or if anyone involved in the review would like additional information, please contact the undersigned and we will expeditiously respond.

Sincerely,

HOWARD & HOWARD

Jon S. Faletto

Enclosure
cc: Y. Yarrington, IEPA
D. Punzak, P.E., IEPA
D. Carey, W.R. Meadows, Inc.
S. Falcone, Black & Veatch Engineers

FUGITIVE EMISSIONS FROM W.R. MEADOWS' HAMPSHIRE, ILLINOIS FACILITY

September 17, 1996

Submitted to

Illinois Environmental Protection Agency

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FUGITIVE EMISSIONS FROM
W.R. MEADOWS' HAMPSHIRE, ILLINOIS FACILITY

A. General Description of the Asphalt Expansion Joint Manufacturing Process.

W.R. Meadows, Inc. (Meadows) manufactures asphalt-impregnated fiber expansion joint material for use in the construction industry. The joint material is composed of a cellulose fiberboard which has been impregnated with an asphalt/mineral spirits blend to achieve a uniform distribution of asphalt within the fiberboard. The asphalt provides the moisture and rot resistance for the fiberboard which allows the asphalt joint material to be used as expansion joints in poured concrete and similar applications. Without complete and sufficient asphalt distribution within the fiberboard, moisture, heat and adverse weather conditions will cause the fiberboard to deteriorate and decompose.

The material known as "fiber expansion joint" manufactured and sold by Meadows must meet specifications established by the American Society for Testing & Materials (ASTM). The applicable standard is known as ASTM D-1751. Properties required by this standard which must be complied with include compression, extrusion (in inches), percent recovery, density, water absorption and asphalt content. Meadows' asphalt joint material is used in construction of roads, bridges, major structures and other projects. Design and material specifications for those types of projects typically require ASTM-compliant materials. Meadows' fiber expansion joints must meet the terms of the ASTM Standard or it will be rejected as non-compliant material.

In order to comply with the ASTM Standard, Meadows utilizes a manufacturing process to ensure that manufactured boards comply with all relevant portions of the ASTM standard. At the Hampshire facility, the manufacturing process consists of the following related operations.

Above-ground storage tanks are utilized for raw materials storage (asphalt and mineral spirits) and the manufacture of the asphalt/mineral spirits blend which is ultimately utilized in the dip tank. The covered dip tank is approximately 70 feet long and has a capacity of approximately 3,300 gallons. Raw (unsaturated) boards of varying lengths and thickness are manually fed into the dip tank at an approximate rate of one board every 15 seconds. The boards are carried through the asphalt/mineral spirits blend via a conveyor with saturated boards stacked manually one board directly on top of another, typically 80 boards per pallet.

After having metal banding attached, the pallet is placed outdoors for an average period of four weeks to allow the individual boards to dry and allow complete penetration of asphalt throughout. The size of the outdoor board drying area is approximately two acres. When dry, some of the saturated boards are cut into varying sizes based on end use. A portion of the saturated boards are also sold as sheet stock.

During the manufacturing operations, VOM is emitted from the asphalt saturator unit itself, and from the saturated fiberboard stored in storage areas, as the asphalt "wicks" through the fiber material during an approximate four week period. If the fiberboards are unbundled from the pallets before the end of the four week period, Meadows has found that the asphalt does not penetrate the full thickness of the board. The result is a partially treated fiberboard that resembles an "oreo cookie" with black asphalt on both sides of the fiberboard and the untreated center material remaining the light fiber color. If the asphalt has not fully penetrated the fiberboard, the joint material cannot satisfy the ASTM Standard and will not be weatherproof. Meadows cannot sell this non-compliant product to its customers, and it cannot be used as expansion joint material in construction projects.

It has been Meadows' past experience that accelerated drying of the fiber expansion joint is not feasible as it inhibits the wicking action of the asphalt into the board and results in a non-compliant product. Faster drying would allow Meadows to produce asphalt joint material at a faster rate since less time and space would be devoted to storage of the pallets during the wicking process. Drying the fiberboards, which drives off the VOM component of the asphalt blend prevented full asphalt penetration of the fiberboard. Forced drying resulted in the same "oreo cookie" problem that was experienced when the pallets were unbundled before the end of the four week curing period.

Meadows also researched the effect of reducing the mineral spirits in the asphalt mixture to reduce VOM emissions. This resulted in the asphalt not penetrating completely through the fiberboard, producing the same "oreo cookie" effect with black asphalt on both surfaces and the untreated lighter fiber in the center. The "oreo cookie" board fails to meet the ASTM criteria and cannot be used for asphalt joint material in construction projects.

To alleviate some of the storage constraints that occurred during storage of the boards, Meadows attempted to stack one or more pallets on top of each other. Meadows has experienced longer drying times from these "stacked" pallets. In order to correct this problem, pallets of saturated boards must be single-stacked.

In summary, Meadows' has determined that manufacturing asphalt joint material must include the approximate four week "wicking" period for each pallet of saturated fiberboard. Shortening the "wicking" period by unbundling the boards, reducing the mineral spirits content of the saturant blend and/or forced drying of the saturated boards all result in a fiberboard that is not fully impregnated with asphalt and which fails to meet the applicable ASTM standard. Similarly, stacking of pallets alters the "wicking" process of the asphalt mixture and produces a product that is not saleable after the four week curing period.

B. Applicable Permitting Regulations.

As agreed by IEPA officials during our meeting, whether or not the VOM emissions from the saturated boards can be classified as "fugitive emissions," determines the appropriate permitting requirements for the Hampshire facility. An overview of the applicable permitting regulations from Chapter 35 Illinois Administrative Code (IAC) Part 203 "Major Stationary Sources - Construction And Modification" underscores the importance of this threshold question. Copies of the applicable regulations are included as Attachment A.

Section 203.206 of the applicable regulations defines the types of stationary sources that are subject to the permitting standards and requirements of Part 203. Only "major stationary sources" that have actual or potential emissions above specified emissions thresholds are covered by Part 203. Since the Hampshire facility is located within Kane County at the westernmost edge of the "severe" Chicago metropolitan ozone nonattainment area, emissions of VOM from the facility exceeding 25 tons per year will trigger applicability of Part 203. This section also specifies which types of VOM emissions, i.e. point source or fugitive, are included in the calculation of the 25 ton threshold. In areas designated as severe, serious and extreme, "...the fugitive emissions shall be included in determining whether it is a major stationary source." [See 203.206(e)]. In all other areas, fugitive emissions are <u>not</u> included in the calculation unless the source fits within one of the twenty-eight (28) specified categories.[1]

Companion Section 203.211 provides more specific treatment of sources with significant fugitive emissions. Section 203.211 states:

> **Section 203.211 Permit Exemption Based on Fugitive Emissions.** The provisions of this Part shall not apply to a source or modification that would be a major stationary source or major modification only if fugitive emissions, to the extent quantifiable as evidenced by 35 Ill. Adm. Code 201.122, are considered in calculating the potential to emit of the stationary source or modification and the source does not belong to any of the categories enumerated in Section 203.206(d) (emphasis added).

In contrast to the general provision in 203.206 to include fugitive emissions of VOM for <u>all</u> sources located in severe ozone nonattainment areas, Rule 203.211 applies to a

---

[1]Note: Inclusion of fugitive VOM emissions for sources other than the 28 specified categories was a recent amendment to Rule 203.206 and departs from the U.S. EPA's long history of excluding fugitive emissions unless a source is one of the 28 categories designated by rulemaking. (See *NRDC v. U.S. EPA*, 937 F.2d 641 (D.C. Cir. 1991.)

much more limited class of sources whose fugitive emissions would put them above the major source threshold and dictate the source's permitting classification. For that limited class of sources, Rule 203.211 dictates that they are not major stationary sources subject to the Part 203 standards and requirements.

Because Section 203.211 is a more specific rule than Section 203.206, its provisions control and must be followed by the IEPA. (*People ex rel. Fore v. Missouri Pacific R.R.*, 342 Ill. 226.) Furthermore, since Section 203.211 was "on the books" in 1995, when Section 203.206 was amended (to include fugitive emissions for sources not in one of the 28 listed categories), it is presumed that IEPA and the Illinois Pollution Control Board intended to maintain the exclusion from "major source" status provided by Section 203.211.

There are two sources of VOM emissions during manufacture of the asphalt joint material; (1) point source emissions from the saturation process unit where the boards are immersed in the asphalt mineral spirits blend; and (2) fugitive emissions from the stored fiberboards during the "wicking" phase when the asphalt mixture slowly penetrates into the center of the fiberboard. If fugitive VOM emissions from the stored fiberboards are included in the calculation of total emissions, then the Hampshire facility would exceed the 25 ton major source threshold. If only the "point source" emissions from the saturation process are included with operating limits and/or controls, the facility would not exceed the applicable threshold. In that case, fugitive VOM emissions would be the sole cause for exceeding the 25 ton threshold, Section 203.211 controls and should provide an exemption from "major source" permitting requirements.

In the permit application submitted for the Hampshire saturation process, Meadows agreed to accept restrictions on hours of operation or material usage to reflect the seasonal nature of this manufacturing operation. (Note: Because the asphalt blend must be maintained at a temperature no lower than 100°F for the saturation process to work, operations at the Hampshire facility must cease in late September or mid-October and cannot startup until mid-April due to the ambient air temperatures.) Meadows can easily maintain compliance with voluntary restrictions imposed in a state operating permit to keep potential point source emissions from the saturator unit well below 20 tons of VOM per year. As set forth in its original permit application, these voluntary limits would avoid "major source" status and allow the Hampshire facility to operate pursuant to Part 201 Subpart E: "Special Provisions For Operating Permits For Certain Smaller Sources."

C. Regulatory Definition of "Fugitive Emissions" and Agency Interpretations.

For purposes of the Part 203 Permitting requirements, the term "fugitive emissions" is defined in Section 203.124. That Section states:

> **Section 203.124 Fugitive Emissions.** "Fugitive Emissions" means those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening.

The definition in the Illinois regulations set forth at Section 203.124 is exactly the same as the federal definition of "fugitive emissions" set forth at 40 CFR §52.21 (20). Unfortunately, neither definition provides any factual indicators as to what would be considered "reasonable" for capturing and passing emissions through a stack, chimney or vent. In its guidance document for Prevention of Significant Deterioration and Non-Attainment Area Permitting (October 1990), the U.S. Environmental Protection Agency ("EPA") identified certain fact patterns to assist permitting authorities in determining whether emissions should be considered to be "fugitive" or not. EPA provided the following three examples:

> *For example, the emissions from a rock crushing operation that could reasonably be equipped with a capture hood are not considered fugitive and would be included in the source's potential to emit.*
>
> *As another example, VOC emissions, even if in relatively small quantities, coming from leaking valves inside a large furniture finishing plant, are typically captured and exhausted through the building ventilation system. They are, therefore, measurable and should be included in the potential to emit.*
>
> *As a counterexample, however, it may be unreasonable to expect that relatively small quantities of VOC emissions, caused by leaking valves at outside storage tanks of the large furniture finishing operation, could be captured and vented to a stack.* (See New Source Review Workshop Manual, October 1990 at page A. 16 included as Attachment B.)

Although the foregoing examples provided by the EPA guidance are not particularly helpful, they can be compared to the factual situation at Meadows' Hampshire facility. In the rock crushing operation, EPA focused on the crushing operation itself and the probability that it could be "equipped with a capture hood." In the second example, the leaking valves inside a large furniture finishing plant were already being "collected" because they occurred within an existing structure. By adding an exhaust system and emissions controls, EPA's example includes "collected emissions" (VOM emissions within

the structure), which could be passed through a stack by the addition of ventilating equipment and reduced by controls.

The third example involves emissions to the ambient air from "outside storage tanks" which are not enclosed within a structure. In the third example, EPA apparently considered it "unreasonable" to expect that the facility operator would construct an enclosure for the outside storage tanks so that the VOC leaks could be "collected" and a ventilation system added to the structure to capture and exhaust those emissions through a stack for treatment.

Of the three examples provided by EPA, the VOM emissions from storage of curing fiberboard at the Hampshire facility most closely resembles the third example. The fiberboards are stored outside and there are no existing structures which could be used to collect those emissions. Furthermore, Meadows has serious doubts as to whether "wicking" of saturant into the fiberboards can occur inside of a closed structure.

In 1980, when the original federal permitting regulations were promulgated, EPA changed its definition of "fugitive emissions." In response to comments, EPA changed the language from "emissions which do not pass through a stack" to the existing language that states "emissions which could not reasonably pass through a stack." EPA explained the change as follows:

> This change will ensure that sources will not discharge as fugitive emissions those emissions **which would ordinarily be collected** and discharged through stacks or other functionally equivalent openings, and will eliminate disincentives for the construction of duct work and stacks for the collection of emissions. (45 Fed. Reg. 52676, Aug. 7, 1980)

This explanation seems to imply that EPA will consider the standard practice in the industry or its similar sources when determining whether or not emissions "would ordinarily be collected" and therefore not meet the definition of "fugitive emissions." This approach was followed by EPA in 1987 in connection with review of air emissions from a landfill site in Ventura County, California. In response to a citizen inquiry, EPA explained that landfill emissions met the definition of "fugitive emissions" contained in the federal regulations. EPA explained:

> "Nationwide, landfills are not ordinarily constructed with gas collection systems. Therefore, emissions from existing or proposed landfills without gas collection systems are considered fugitive emissions and are not considered in Federal NSR applicability determinations." (A copy of the attached interpretation is enclosed as Attachment C for your reference.)

In summary, EPA appears to look at two factors, i.e. collectibility of the emissions for treatment and industry practice, when considering whether air emissions are properly classified as "fugitive" or as point sources.

The determination of whether emissions are considered "fugitive" or point source emissions was addressed by the Illinois Supreme Court in Environmental Protection Agency v. Pollution Control Board, 86 Ill.2d 390 (1981). In that case, IEPA had denied an operating permit for four blast furnaces located at the U.S. Steel Corporation's "South Works" in Chicago. The state regulation applicable to blast furnaces established an emission standard for particulate matter from "process emission sources" and a second standard for "fugitive particulate matter" from any process at the source. The agency denied an operating permit for the blast furnaces because it considered "blast furnace cast house emissions" to be a component of the point source emissions from the blast furnaces rather than fugitive emissions. If the "cast house emissions" which the permit applicant characterized as "fugitive emissions" were not included in the calculation of total particulate emissions from the blast furnaces themselves, the company could comply with the applicable regulations. The issue, therefore, centered on whether the particulate emissions from the "cast house" were properly considered to be "fugitive emissions." (A copy of this decision is included as Attachment D.)

When IEPA's permit denial was reversed by the Pollution Control Board, the Board focused on whether or not the emissions "can be readily collected and treated." The Board's opinion stated, "Our interpretation of the definition of fugitive emissions is that emissions which cannot be readily collected and treated are fugitive in nature." 86 Ill.2d at 396.

The Court approved the Board's determination that cast house emissions were properly classified as "fugitive emissions" because "the company's cast house emissions were not collectible." The Court affirmed the Board's use of the concept of "collectibility" in determining whether or not a certain type of air pollution was properly classified as "fugitive." The Court also found persuasive, although not controlling, that no other blast furnace facilities collected cast house emissions. The Court noted, ". . . the absence of even one example of the collection of such particulate emissions by stacks tends to support the Board's conclusion concerning collectibility."

In that case, the record demonstrated that particulate emissions from the cast house actually occurred within a structure, "These emissions occur in what is known as the cast house and escaped to the atmosphere by way of roof monitors, doors, and other openings in the building." In essence, there was a building which housed the blast furnaces and ladle cars used in the casting operations. Despite the fact that a structure existed, the Board and the Illinois Supreme Court found that such emissions were not "readily collectible," and therefore were considered to be "fugitive" in nature.

In contrast to the facts presented in that decision, there is no structure at Meadows' Hampshire facility in which the saturated fiberboards are stored during the "wicking" process. Furthermore, Meadows' has serious doubts as to whether the manufacturing process can be accomplished inside a structure. To find that VOM emissions from the stored pallets of fiberboards are "readily collectible," IEPA must determine that construction of a structure in which to store pallets of saturated fiberboards is a necessary prerequisite. Neither the Supreme Court's decision nor EPA guidance documents would appear to impose such a requirement.

D. Reasonableness of Collecting and Treating "Fugitive Emissions."

In making a determination of whether or not emissions from the stored saturated fiberboards are properly classified as "fugitive emissions," the IEPA needs to determine whether or not it is "reasonable" to pass those emissions through a stack, chimney, vent or other functionally equivalent opening. As further interpreted by EPA, the Illinois Pollution Control Board and the Illinois Supreme Court in similar situations, the Agency also needs to determine whether those emissions are "readily collectible" and can also consider whether or not it is the practice in the fiberboard manufacturing industry to collect emissions from stored fiberboards.

1. Technical and Economic Feasibility of Collecting Fiberboard Emissions

From emissions testing performed at the Hampshire facility, it has been determined that mineral spirits emissions from each pallet during the drying period of four weeks averages 100 pounds. A building approximately 460 feet long by 200 feet wide by approximately 25 feet high would be used as a drying room. The floor space approximates the space currently being used outside at the Hampshire facility. This building would include a mechanical room for the VOC control equipment. The complete building cost would be $3,986,230.

DESIGN CRITERIA	
Exhaust CFM:	95,000 SCFM
Inlet Temperature, Max:	90 degrees F
Yearly Operating Hours:	6,500 hours
Mineral Spirits Cost:	76 cents/gallon

REFRIGERATION CONDENSING UNIT

Using a refrigeration method to remove and recover mineral spirits has the advantage of recovering and reusing mineral spirits in the saturation process.

Capital Cost:	$ 3,376,000
Installation Cost:	213,000
Collection System:	375,000
Utility Services:	135,000
Annual Utility Costs:	90,000
Mineral Spirit Reclaim:	(Annual) -33,000
Five-Year Annualized Cost:	876,800

OXIDIZER UNITS

A catalytic oxidizer was used for comparison for the above design conditions,

Catalytic Oxidizer System	$ 2,346,000
Capital Cost:	150,000
Installation Costs:	360,000
Collection System:	135,000
Utility Services:	90,000
Annual Utility Costs:	(Every 5 years) 400,000
Catalytic Converter Replacements:	768,200
Five-Year Annualized Cost:	

These costs are very high because of the amount of air needed to exhaust a building of the size needed. Using the less expensive of the two control options and factoring in the cost of the building, $3,986,230, from the accompanying spreadsheet, the five-year annualized cost becomes $1,565,400 or about $11,200 per ton of VOC removed. This is a very high cost of removal compared to other applications that lend themselves more readily to capture and control. In the case of W. R. Meadows, it is prohibitively high.

Run Date: 16-Sep-96

Project: 26514.0300
Location: Elgin, IL

Cost Code	Unit	Quantity	Cost Element	Total Hours	Labor Dollars	Equip Dollars	Matl Dollars	Other Dollars	Accum Dollars
1.00	Acres	2.11	Site Development	469	20,171		88,740	2,500	111,411
2.00	CY		Concrete						
2.00	TN		Steel						
3.00	SF	92000	Buildings	10,682	459,323		261,126	2,263,400	2,983,849
4.00	LF		Piping						
5.00	PCS		Equipment						
6.00	HP		Electrical	192	8,256	39,900			48,156
7.00	EA		Controls/Instr						
8.00	SF		Insulation						
8.00	SF		Painting						
		Sub-Total	*Direct Field Cost*	*11,343*	*487,750*	*39,900*	*349,866*	*2,265,900*	*3,143,416*
9.01		Months	Mobilization/Demob						
9.01		Months	Temporary Facilities & Util		4,878		29,265		34,143
9.01		Months	Const. Equipment/Scaffold			48,775	14,633		63,408
9.01		Months	Field Staff - Contractor's					87,795	87,795
9.02		Months	Security & First Aid		2,439				2,439
9.02		Months	Start-up Assistance						(By Others)
		Sub-Total	*Construction Indirects*		*7,316*	*48,775*	*43,898*	*87,795*	*187,784*
		Sub-Total	*Construction Costs*	*11,343*	*495,066*	*88,675*	*393,763*	*2,353,695*	*3,331,200*
					14.9%	2.7%	11.8%	70.7%	
		Engr/Constr Mgmt/Fees						233,184	233,184
		Permits						16,656	16,656
		Insurances						58,296	58,296
		Taxes							
		Sub-Total	*Project Indirects*					*308,136*	*308,136*
		Sub-Total		*11,343*	*495,066*	*88,675*	*393,763*	*2,661,831*	*3,639,336*
			Contingency		99,013	8,868	39,376	199,637	346,894
		TOTAL	PROJECT COST	11,343	$594,080	$97,543	$433,140	$2,861,468	$3,986,230

NOTES: NO allowances for demolition, relocation of existing items, or underground obstructions.
Prices are third quarter 1996.

2. Practice in the Industry

Meadows has undertaken an investigation to determine if any other manufacturer of fiber expansion joint have installed collection and control equipment for VOM emissions from the stored fiberboards during the "wicking" process. Unfortunately, no other manufacturer utilizes a manufacturing process that is similar to Meadows' operations, with storage of "wet" fiberboards in pallets to allow penetration of the asphalt blend into the board. The Masonite Corporation, a competitor which operates a facility in Oregon, utilizes a manufacturing process during which raw fiber and emulsified asphalt are mixed together and then the mixture is pressed into expansion joint material. To the best of Meadows' knowledge, Masonite does not store its finished product within huge structures to collect and treat otherwise fugitive emissions.

Meadows owns and operates a fiberboard manufacturing facility located in Austell, Georgia, which is within the designated Atlanta ozone non-attainment area. The manufacturing process at the Austell facility is identical to the process at Meadows' Hampshire facility and saturated fiberboards are stored in pallets outside to allow complete penetration of the asphalt blend. The Georgia Department of Natural Resources considers the VOM emissions from the stored fiberboards to be "fugitive" emissions, and they are <u>not</u> included in the calculation of total emissions from the Austell facility for determining major source status.

CONCLUSION

As demonstrated by the technical and economic feasibility analysis, VOM emissions from the stored fiberboards during the "wicking" process cannot "reasonably pass through a stack, chimney, vent or other functionally equivalent opening." To the contrary, it would be unreasonable to require the outrageous expenditure of money needed to construct a structure large enough to house the stored fiberboards and collect VOM emissions during the approximate four week curing period. In applying the EPA guidance and following the reasoning of the Illinois Supreme Court faced with a similar issue of regulatory interpretation of "fugitive emissions," it is clear that VOM emissions are <u>not</u> readily collectible and therefore, fall squarely within the definition of "fugitive emissions."

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Via Fax and Federal Express

November 8, 1996

Julie K. Armitage, Esq.
Associate Counsel
Air Enforcement
Division of Legal Counsel
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

Re: Federal Guidance Authorizing States to Exclude Fugitive Emissions from Major Source Threshold Calculations

Dear Ms. Armitage:

As you know, our firm represents W.R. Meadows, Inc. (Meadows) in connection with a permitting dispute involving the asphalt expansion joint manufacturing operations located at Meadows' Hampshire, Illinois facility. The key question involved in that matter is whether the fugitive emissions from the fiberboard storage areas must be included in calculating total volatile organic compound emissions (VOM) to assess major source status.

There are two regulations included in 35 IAC Part 203 "Major Stationary Sources - Construction and Modification," that dictate which VOM emissions are to be included in determining whether emissions from Meadows' operations exceed the major source threshold. Section 203.206(e) states generally that the fugitive emissions should be included in determining major source status for all sources locating in severe ozone non-attainment areas. The more specific rule at Section 203.211 states that the requirements of Part 203 shall not apply to a source that would be a major stationary source only if fugitive emissions are included in the calculation, unless the source belongs to one of the identified industrial categories. (We have previously agreed that Meadows' asphalt expansion joint manufacturing operations do not belong to one of the identified industrial categories for which fugitives are included.)

In prior discussions, you indicated that Section 203.206(e) appeared to be inconsistent with the specific exemption set forth at Section 203.211. Moreover, you believed that federal guidance required the State of Illinois to include in the major source calculations the fugitive VOM emissions for all new sources locating within the Chicago severe ozone non-attainment area. As a result, the agency questioned whether it could implement Section 203.211 or even acknowledge the legal authority of the rule.

Our research indicates that Illinois EPA can and should implement Section 203.211 because federal guidance including fugitive emissions has completely changed. Enclosed please find a guidance memo dated March 8, 1994 in which the U.S. Environmental Protection Agency (EPA) reversed its earlier position on including fugitive emissions in major source calculations for ozone non-attainment areas. The key language appears on page 5 wherein EPA states:

> The EPA has revised its interpretation of the Act from that stated in the response to comments document. **The EPA now believes the Act does not require fugitives to be considered for purposes of determining major source status in these non-attainment areas, except as provided pursuant to rulemaking under Section 302(j).**

We have verified with EPA's Kirt Cox, the contact person identified in the guidance memo, that this is the agency's most recent pronouncement on the issue and remains current EPA policy.

When applied to Illinois' Part 203 regulations, the EPA's current regulatory policy clarifies that Sections 203.206(e) and 203.211 are entirely consistent. The Illinois EPA can recognize and implement the specific exemption provided by Section 203.211 in full compliance with federal law and guidance. This is all that Meadows is asking the agency to do.

We are anxious to reach an amicable resolution of this matter and to conserve the time and resources that otherwise will be devoted to unnecessary litigation. Meadows has committed to installing controls on its point source to maintain VOM emissions well below the 25 ton per year threshold. Fugitive emissions will be controlled by limiting the VOM content of the coating compound in compliance with 35 IAC Part 218, Subpart PP standards. This commitment will be documented in specific conditions of an operating permit and would be fully enforceable by the agency.

We would like to discuss resolution of this matter at your earliest convenience.

Sincerely,

HOWARD & HOWARD

Jon S. Faletto

Enclosure
cc: Donald Sutton, P.E.
Joseph E. Svoboda, Esq.
Richard F. Bulger, Esq.
John Schmidt, Esq.
Dave Carey, Meadows

March 8, 1994

MEMORANDUM

SUBJECT: Consideration of Fugitive Emissions in Major Source Determinations

FROM: Lydia Wegman, Deputy Director /s/
Office of Air Quality Planning and Standards (MD-10)

TO: Director, Air, Pesticides and Toxics Management Division, Regions I and IV
Director, Air and Waste Management Division, Region II
Director, Air, Radiation and Toxics Division, Region III
Director, Air and Radiation Division, Region V
Director, Air, Pesticides and Toxics Division, Region VI
Director, Air and Toxics Division, Regions VII, VII, IX, and X

This memorandum summarizes the Environmental Protection Agency's (EPA's) policy regarding the consideration of fugitive emissions for the purpose of determining whether a source is major under the Clean Air Act (Act). As explained below, EPA will revisit, in a future revision to the part 70 regulations ("Operating Permit Programs"), the requirement to consider fugitives from sources subject to national emission standard for hazardous air pollutants (NESHAP) and new source performance standards (NSPS) promulgated after August 7, 1980, when determining whether a source is major under section 302(j) of the Act. For the present time, State operating permits programs that do not require consideration of fugitives for these sources will be eligible for interim approval. States must require consideration of fugitives for purposes of determining whether a source is major under section 112, but need not require consideration of fugitives for purposes of the new major source definitions in part D of title I of the Act.

I. Background: Statutory and Regulatory Provisions Affected

A. Section 302(j) and Section 169(1)

The Act's primary definition of "major stationary source" and "major emitting facility" is found in section 302(j) in the general definitions portion of the Act. It reads:

> Except as otherwise provided, the terms "major stationary source" and "major emitting facility" mean any stationary facility or source of air pollutants which directly emits, or has the potential to emit, 100 tons per year (tpy) or more of any air pollutant (including any major emitting facility or source of fugitive emissions of any such pollutant, as determined by rule by the Administrator).

The section 302(j) definition was added to the Act in 1977. Another definition of "major emitting facility" was added in 1977 in section 169(1). It sets a higher 250 tpy threshold for certain source categories for purposes of part C preconstruction review.

B. Lower Threshold Definitions Added by the 1990 Amendments to the Act

The 1990 Amendments added nine new definitions of "major source" or "major stationary source." Seven of these definitions appear in part D of title I and expand the set of "major stationary sources" of volatile organic compounds, particles with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM-10), and CO for nonattainment areas by lowering the tonnage threshold below the 100 tpy specified in section 302(j).[1]

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[1]These are, specifically: §182(c), "Serious Areas" for ozone nonattainment; §182(d), "Severe Areas" for ozone nonattainment; §182(e), "Extreme Areas" for ozone nonattainment; §182(b)(1)(A)(ii)(I), new source review in "moderate areas" for ozone nonattainment; §187(c), "Serious Areas" for carbon monoxide nonattainment; §184(b)(2), interstate ozone control; §189(b)(3), "Serious Areas" for PM-10 nonattainment.

The other two new definitions are found in section 112(a)(1) and title V.[2] Section 112 provides a definition of "major source" similar to the definition of "major stationary source" and "major emitting facility" in part D of title I only tailored to the new hazardous air pollutants (HAP) provisions. The title V definition incorporates by reference all of the other "major source" and "major stationary source" definitions.

C. "Major Source" Definitions in Part 70

The definition of "major source" in section 70.2 of the permits rule divides into three parts, corresponding to the section 112 definition, the section 302(j) definition, and the lower tpy thresholds in the title I nonattainment provisions, respectively. The second definition, corresponding to section 302(j), requires the counting of fugitive emissions only for certain listed source categories. The other two part 70 definitions are silent on the issue of when fugitive emissions must be considered.

The section 302(j) definition lists 27 categories of sources for which fugitive emissions must be considered in determining whether a source is major for purposes of section 302(j). The twenty-seventh category requires that fugitive emissions be considered for:

> All other stationary source categories regulated by a standard promulgated under section 111 or 112 of the Act, but only with respect to those air pollutants that have been regulated for that category.

For present purposes, this should be contrasted with the corresponding provisions in the prevention of significant deterioration (PSD) and new source review (NSR) regulations (see, e.g., 40 CFR §51.165(a)(1)(iv)(C)), which refer to:

> Any other stationary source category which, as of August 7, 1980, is being regulated under section 111 or 112 of the Act.

Regarding the first and third parts of the part 70 "major source" definition, the question of when fugitive emissions must be considered for applicability purposes was addressed directly

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[2]Section 501(a)(1) provides: The term "major source" means any stationary source (or any group of stationary sources located within a contiguous area and under common control) that is either of the following: (a) a major source as defined in section 112, and (b) a major stationary source as defined in section 302 or part D of title I.

in the response to comments document for the part 70 rulemaking. Section 3.5 of the response document states that the Act requires fugitives to be considered for purposes of determining whether a source is major under any of the part D or the section 112 definitions.

II. Summary of EPA Policy

In response to questions raised following promulgation of part 70, EPA has reconsidered the treatment of fugitives for purposes of making major source determinations. The EPA's decisions regarding the relevant provisions is summarized below in three parts.

A. Sources Subject to NSPS or NESHAP Standards Promulgated after August 7, 1980

The designation in the part 70 rules of sources subject to NSPS and NESHAP promulgated after August 7, 1980 as sources for which fugitives must be counted for purposes of major source determinations did not follow the procedural steps necessary for a proper rulemaking under section 302(j). As a result, EPA believes it would be inappropriate for the Agency to require States to count fugitives from these sources in making section 302(j) major source determinations. In the absence of a legally-sound Federal requirement, a State may choose to exercise its own legal authority to require that fugitives from sources subject to the post-1980 standards be considered in determining major source status under section 302(j). However, a State need not require that fugitives from these sources be so counted in order to obtain interim approval of its title V program.

The EPA intends to revisit this aspect of the rule in a revision to part 70 to occur sometime in 1994. The EPA believes that it may, in the mean time, grant interim approval to programs that do not require fugitives to be considered in determining the status of sources subject to post-1980 NSPS and NESHAP standards. However, until the rule is revised with respect to sources subject to the post-1980 standards, EPA may not grant full approval to a State program that does not include the post-1980 standards. Programs adhering to the language in the current rule will be eligible for full approval provided, as is the case for any element of part 70, the State has provided adequate legal authority for that element of its program.

Note that the policy articulated in section C below regarding the section 112 major source definition operates independently of a State's decision to list the post-1980 NESHAP standards for purposes of determining whether a source is major under the section 302(j) definition. Therefore, in determining whether a source is major for section 112 purposes, a source must

consider fugitive emissions of HAP listed pursuant to section 112(b) regardless of whether the source is in a category designated through rulemaking under section 302(j).

B. Definitions of "Major Stationary Source" in Part D of Title I

The EPA has revised its interpretation of the Act from that stated in the response to comments document. The EPA now believes the Act does not require fugitives to be considered for purposes of determining major source status in these nonattainment areas, except as provided pursuant to rulemaking under section 302(j). State programs that follow this revised interpretation will be eligible for full approval, as will programs that follow the more inclusive policy articulated in the response to comments document, provided the more inclusive program is supported by adequate State law authority.

The legal rationale for this position is that nothing in the statute or the legislative history of the Part D definitions indicates an intent to depart from the section 302(j) requirement that rulemaking be done before fugitives are included for applicability purposes in nonattainment areas. To the contrary, the explicit reference in most of these Part D definitions back to section 302(j), and the fact that these provisions address a broad universe of sources emitting a particular pollutant or class of pollutants, suggests that the section 302(j) rulemaking requirement carries over to these definitions. It is therefore permissible to read the Act not to require the consideration of fugitive emissions for these purposes.

C. Definition of "Major Source" in Section 111

The EPA continues to believe the Act requires that fugitive emissions, to the extent quantifiable, must be considered in determining major source status for all section 112 purposes. This policy applies to a source of any of the section 112(b) listed pollutants whether or not the source in question is in a category listed pursuant to section 112(c). The EPA expects States to comply with this policy in their operating permits program submittals.

The section 112 "major source" definition is distinguishable legally from the Part D definitions in some important respects. Section 112 uses the term "major source" as opposed to "major stationary source," and legislative history indicates an intent to treat this definition as distinct from the section 302(j) "major stationary source" definition. Moreover, section 112 establishes a new regulatory program wherein Congress has narrowed the regulatory concern to specific pollutants at

specific source categories to be determined by EPA. All of this suggests that the section 302(j) rulemaking requirement does not apply in the context of section 112, and that fugitive emissions must therefore be included for purposes of determining whether a source is major under section 112.

D. Collocation of Sources

Questions have also been raised regarding the treatment of fugitive emissions where sources in categories listed pursuant to section 302(j) are collocated with sources that are not in any of the listed categories. The EPA intends to follow the policies established in implementation of the PSD and NSR programs. Only the fugitive emissions from the listed source are required to be counted for purposes of determining major source status. Where there is a collocated source that is not on the source category list and where the nonlisted source is the primary activity at the site, fugitive emissions would not need to be counted from the collocated, nonlisted source. The EPA will issue case examples to help clarify application of this principle in the near future.

For further information, please contact Kirt Cox, Operating Permits Policy Section, at (919) 541-5399, or Adan Schwartz, Office of General Counsel, at (202) 260-7632.

cc: Air Branch Chief, Regions I-X
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