



**NO SEND  
WITNESSED**

# REVIEW



ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

ID No.:	097190AFG	Test Date:	3/6/2020
Source Name:	Medline Industries		
Location	1160 South Northpoint Boulevard, Waukegan, Illinois 60085		
Permit No.	19020013	<b>TYPE OF TEST PROGRAM:</b>	
<input type="checkbox"/> FESOP <input type="checkbox"/> Title V <input type="checkbox"/> Lifetime <input checked="" type="checkbox"/> Construction		<input type="checkbox"/> Initial Performance <input type="checkbox"/> CEMS Certification	<input type="checkbox"/> Annual/Periodic <input checked="" type="checkbox"/> Other: <u>Confirmatory</u>
Emission Unit(s):	Commercial Sterilizer		
Control Equipment:	Permanent Total Enclosure (PTE)		
<b>APPLICABLE RULE:</b>	<input checked="" type="checkbox"/> 415 ILCS 5-9.16 <input type="checkbox"/> 35 IAC PART ____ <input type="checkbox"/> 40 CFR PART 60, SUBPART ____ <input checked="" type="checkbox"/> 40 CFR PART 63, SUBPART O		
<b>SOURCE</b>	Contact	Jasper Titus	
	Phone Number	Office: 847-837-2784 Cell: 201-887-2034	
	Email	<a href="mailto:JTitus@medline.com">JTitus@medline.com</a>	
<b>TESTING COMPANY</b>	Company Name	Montrose Air Quality Services, LLC (Montrose)	
	Contact	Don Chapman	
	Phone Number	847-487-1580	
	Email	<a href="mailto:dchapman@montrose-env.com">dchapman@montrose-env.com</a>	
	Report No.	M928ET-663754-RT-457	

Parameters	USEPA REFERENCE METHODS	Yes	No
<input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> Opacity <input type="checkbox"/> CO <input type="checkbox"/> VOM <input type="checkbox"/> HCl <input type="checkbox"/> DE <input checked="" type="checkbox"/> CE <input type="checkbox"/> Metals <input type="checkbox"/> Dioxins/Furans	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3_ <input type="checkbox"/> 4 <input type="checkbox"/> 5_ <input type="checkbox"/> 6_ <input type="checkbox"/> 7_ <input type="checkbox"/> 9 <input type="checkbox"/> 10 <input type="checkbox"/> 12 <input type="checkbox"/> 18 <input type="checkbox"/> 19 <input type="checkbox"/> 20 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 25_ <input type="checkbox"/> 26 <input type="checkbox"/> 29 <input type="checkbox"/> 201_ <input type="checkbox"/> 202 <input checked="" type="checkbox"/> 204 <input type="checkbox"/> 204_ <input type="checkbox"/> ____ <input type="checkbox"/> ____		
Alternative method(s)	NONE		
Did Permittee propose or use proper method(s)?		✓	

Process Information	Yes	No
Process rate allowed in permit or unit capacity:	N/A	
Process rate during stack test:	N/A	
Was the process rate during stack test within 90 or 100% of allowable? (i.e. was stack test done under conditions representative of maximum emissions?)	N/A	



COMPLIANCE DEMONSTRATION			Yes	No
<b>Protocol</b>	Submitted?	Date: October 24, 2019 Original January 27, 2020 Revised	✓	
	Submitted timely?	45 days prior to test	✓	
	Approved?		✓	
Did testing follow the approved protocol?			✓	
Were raw field & laboratory sheets included with the final report?			✓	
Test for appropriate length of time?			✓	

<b>Emissions:</b>	<b>Pollutant</b>	<b>Emission</b>	<b>Limit</b>	
	Capture Efficiency	100%	100%	Construction Permit Condition 3.b.i

Are test results in compliance with applicable requirements, permit special conditions, and Agency averaging policy/rule?	Yes	No
	✓	

**Comments:**

Medline Industries (Medline) contracted with Montrose to perform the capture efficiency test on the PTE in accordance with construction permit 19020013, condition 8.1.b.i, prior to emissions testing of the control system.

*Construction Permit Condition 8-1. Requirements for Testing for Permanent Total Enclosure (PTE)*

- a. *The Permittee shall have testing for the presence of PTE on the affected facility, as required by Condition 3(b)(I), conducted by a qualified testing service that is independent of the Permittee and is experienced in such testing, as follows.*
- b. *This testing for PTE shall be conducted:*
  - i. *Within 45 days of the effectiveness of Condition 3(b)(I) provided, however, that the results of this testing shall be compiled before the initial testing of emissions required by Condition 8-2(a)(i) is conducted.*

After the initial PTE test program, Medline adjusted the direction of air flow within the PTE and modified an NDO; hence, the Illinois EPA requested that the PTE be re-evaluated. The author was present during the initial and subsequent PTE evaluation ensuring the PTE met all the criteria of USEPA Method 204 Section 6.

- Any NDO shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
- The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
- The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.
- All access doors and windows whose areas are not included in section 5.3 and are not included in the calculation in section 5.4 shall be closed during routine operation of the process.
- All VOC emissions must be captured and contained for discharge through a control device.

The differential pressure ( $\Delta P$ ) between the inside of the PTE and the outside is monitored by a continuous parameter monitoring system (CPMS) and agreed with the measurements collected by Montrose during the test.

Medline Industries  
 ID No.: 097190AFG  
 Application No.: 19020013  
 Test Date: March 6, 2020

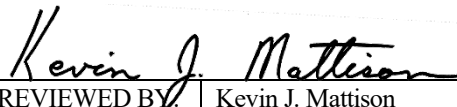


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It is recommended that the Illinois EPA accept the PTE verification test report, which confirms the PTE captures 100% of the emissions.

Please contact the undersigned if you have any questions.

		March 26, 2020	Test Report Approved	Yes	No
				✓	
REVIEWED BY:	Kevin J. Mattison	Date	Compliance Demonstrated? (See comments above)	✓	