

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Engineered Polymer Solutions D/B/A Valspar Coatings  
I.D. No.: 201030AFE  
Application No.: 96030206  
May 16, 2001

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Engineered Polymer Solutions  
D/B/A Valspar Coatings  
Attn: Denise M. Fussy  
1215 Nelson Boulevard  
Rockford, Illinois 61104

Application No.: 96030206                      I.D. No.: 201030AFE  
Applicant's Designation:                      Date Received: March 7, 1996  
Operation of: Paint and Resin Manufacturing  
Date Issued: TO BE DETERMINED                      Expiration Date<sup>2</sup>: DATE  
Source Location: 1215 Nelson Blvd., Rockford, Winnebago, IL 61104  
Responsible Official: Ken Arthur/Group Vice President, Architectural

This permit is hereby granted to the above-designated Permittee to OPERATE a paint manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Nathan A. Frank at 217/782-2113.

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

DES:NAF:jar

cc: Illinois EPA, FOS, Region 2  
USEPA

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

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<sup>2</sup> Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Engineered Polymer Solutions  
D/B/A Valspar Coatings  
1215 Nelson Boulevard  
Rockford, Illinois 61104  
815/967-1258

I.D. No.: 201030AFE  
Standard Industrial Classification: 2851

1.2 Owner/Parent Company

The Valspar Corporation  
1101 Third Street South  
Minneapolis, Minnesota 55415

1.3 Operator

Engineered Polymer Solutions  
D/B/A Valspar Coatings  
1215 Nelson Boulevard  
Rockford, Illinois 61104

Denise M. Fussy, Health, Safety and Environmental Manager  
815/967-1258

1.4 General Source Description

Engineered Polymer Solutions D/B/A Valspar Coatings is located at 1215 Nelson Boulevard. The source manufactures paint and coatings.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CO	Carbon Monoxide
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
Ft <sup>3</sup>	Cubic Feet
Gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	Kilograms
kW	Kilowatts
lb	Pound
ILCS	Illinois Compiled Statutes
m <sup>3</sup>	cubic meters
mmBtu	Million British thermal units
Mg	Megagrams
MW	Megawatts
mmHg	Millimeters of Mercury
mmscf	Million standard cubic feet
mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan

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SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TDI	Toluene Diisocyanate
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
yr	Year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

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

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

Natural Gas-Fired Boilers with a Capacity Less Than 10  
mmBtu/Hr  
Storage Tanks Containing Glycol Ethers  
Filling Equipment  
Product Weigh Tanks

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

Product Holding Tanks  
Caustic Wash System  
60-Gallon Pilot Kettle

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

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

Equipment used for filling drums, pails, or other packaging containers, excluding aerosol cans, with soaps, detergents, surfactants, lubricating oils, waxes, vegetable oils, greases, animal fats, glycerin,

sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(8)].

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

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

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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

### 3.2 Compliance with Applicable Requirements

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

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

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process

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emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

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

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Filling Equipment	Equipment for Filling Containers with Paint (9 Filing Points)	1/1997	None
14 Stationary Mixers (M-1, M-2, M-3, M-4, M-5, M-6, M-7, M-8, M-9, M-10, M-12, M-16, M-17, CM-14)	Equipment for Mixing Paint	All Pre-1972	Dust Collector (DC-4)
4 Horizontal Mills (SM-6, SM-2, SM-7, SM-4)	Milling of Paint Containing Solvent, Pigment, Resin and Additives	SM-6: 1/1984 SM-2: 1/1996 SM-7: 6/1996 SM-4: 1/2001	None
3 Vertical Mills (SM-1, SM-5, SM-8)	Milling of Paint Containing Solvent, Pigment, Resin, and Additives	All Pre-1972	None
Pre-Filters	Vessels for Filtering of Paint Containing Solvent, Pigment, Resin, and Additives	All 1/1983	None
61 Blend Tanks	Equipment for Blending Paint	All Pre-1972	None
Filling Equipment	Equipment for Filling Containers with Colorant (2 Filing Points)	1/2000	None
3 Stationary Mixers (M-23, M-24, M-25)	Equipment for Mixing Waterbased Colorant	All 1/1979	Dust Collector (DC-8)
9 Horizontal Mills (SM-4C, SM-5C, SM-1C, SM-3C, SM-6C, SM-7C, SM-8C, SM-9C)	Milling of Colorant Containing Water, Pigment, Glycol, and Additives	SM-4C: 1/1989 SM-5C: 1/1989 SM-3C: 1/1992 SM-6C: 1/1992 SM-7C: 1/1998 SM-8C: 1/1998 SM-9C: 1/1998	None
1 Vertical Mill (SM-2C)	Milling of Colorant Containing Water, Pigment, Glycol and Additives	Pre-1972	None

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11 Blend Tanks (PT-9C, PT-10C, PT-11C, PT-12C, PT-2C, PT-3C, PT-4C, PT-5C, PT-6C, PT-7C, PT-8C)	Equipment for Blending Colorant	7 Tanks Pre-1972 PT-9C: 1/1999 PT-10C: 1/1999 PT-11C: 3/2001 PT-12C: 3/2001	None
Emission Unit	Description	Date Constructed	Emission Control Equipment
2 Vacuum Mixers (VM- 1, VM-2)	Mixing of Waterbased Colorant and Vacuuming for Deaeration	VM-1: Pre-1972 VM-2: 1/1979	None
6 Vacuum Pumps (VP-1, VP-2, VP-3, VP-4, VP-5, VP-6)	Equipment to Deaerate Colorant	VP-1: 1/1979 VP-2: 1/1979 VP-3: 1/1979 VP-4: 1/2000 VP-5: 3/2001 VP-6: 3/2001	None
Reactor K-1	3,000 Gallon Capacity Reaction Vessel Used to Make Resins	1/2001	Scrubber S-1 Condenser C-1
Reactor K-2	1,800 Gallon Capacity Reaction Vessel Used to Make Resins	8/1995	Scrubber S-1 Condenser C-2
Reactor K-5	5,500 Gallon Capacity Reaction Vessel Used to Make Resins	7/1997	Condenser C-3
4 Filter Presses (FP-4, FP-1, FP-2, FP-3)	Equipment for Filtering Resin Product	FP-4: 6/1998 FP-1: 6/2000 FP-2: 6/2000 FP-3: 10/2000	None
6 Thin Tanks (RT-1, RT-2, RT-4, RT-5, RT-6, RT-7)	Equipment Used to Thin Resin to Required Viscosity	RT-1: Pre-1972 RT-2: Pre-1972 RT-4: 3/1997 RT-5: 3/1997 RT-6: 6/1997 RT-7: 6/1997	RT-1: Condenser C-5 RT-2: Condenser C-6 RT-5: Condenser C-8
RMT-1003	14,500 Gallon Solvent Storage Tank	Pre-1972	None
RMT-1004	20,000 Gallon Solvent Storage Tank	Pre-1972	None
RMT-1005	10,000 Gallon Solvent Storage Tank	Pre-1972	None

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RMT-1006	10,000 Gallon Solvent Storage Tank	Pre-1972	None
RMT-1007	11,300 Gallon Solvent Storage Tank	Pre-1972	None
RMT-1008	11,300 Gallon Solvent Storage Tank	Pre-1972	None
RMT-1010	Raw Material Storage Tank	Pre-1972	None
RMT-1011	11,750 Gallon Solvent Storage Tank	Pre-1972	None
RMT-1012	Raw Material Storage Tank	Pre-1972	None
RMT-1013	Raw Material Storage Tank	Pre-1972	None
Emission Unit	Description	Date Constructed	Emission Control Equipment
RMT-1014	10,000 Gallon Solvent Storage Tank	5/1997	None
RMT-1056	Raw Material Storage Tank	Pre-1972	None
RMT-1089A	4,000 Gallon Hazardous Waste Storage Tank	Pre-1972	None
RMT-1089B	Raw Material Storage Tank	Pre-1972	None
RMT-1095	Raw Material Storage Tank	Pre-1972	None
RMT-1057	11,000 Gallon TDI Storage Tank	Pre-1972	None
RMT-1090	4,000 Gallon Xylene Storage Tank	Pre-1972	None
RMT-3001	Raw Material Storage Tank	Pre-1972	None
RMT-3002	Raw Material Storage Tank	Pre-1972	None
RMT-4003	Raw Material Storage Tank	Pre-1972	None
RMT-4004	Raw Material Storage Tank	Pre-1972	None
RMT-4005	Raw Material Storage Tank	Pre-1972	None
RMT-4006	Raw Material Storage Tank	Pre-1972	None
RMT-4007	Raw Material Storage	Pre-1972	None

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	Tank		
RMT-4008	Raw Material Storage Tank	Pre-1972	None
RMT-4009	Raw Material Storage Tank	Pre-1972	None
RMT-4010	Raw Material Storage Tank	Pre-1972	None
RMT-4011	Raw Material Storage Tank	Pre-1972	None
RMT-4012	Raw Material Storage Tank	Pre-1972	None
RMT-4013	Raw Material Storage Tank	Pre-1972	None
RMT-4014	Raw Material Storage Tank	Pre-1972	None
RMT-4024	Raw Material Storage Tank	Pre-1972	None
RMT-4025	Raw Material Storage Tank	Pre-1972	None

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Emission Unit	Description	Date Constructed	Emission Control Equipment
RMT-4026	Raw Material Storage Tank	Pre-1972	None
RMT-4029	Raw Material Storage Tank	Pre-1972	None
RMT-4030	Raw Material Storage Tank	Pre-1972	None
RMT-4031	Raw Material Storage Tank	Pre-1972	None
RMT-4032	Raw Material Storage Tank	Pre-1972	None
RMT-4033	Raw Material Storage Tank	Pre-1972	None
RMT-4034	Raw Material Storage Tank	Pre-1972	None
RMT-4039	Raw Material Storage Tank	Pre-1972	None
RMT-4040	Raw Material Storage Tank	Pre-1972	None
RMT-4041	Raw Material Storage Tank	Pre-1972	None
RMT-4042	Raw Material Storage Tank	Pre-1972	None
RMT-4043	Raw Material Storage Tank	Pre-1972	None
RMT-4035	11,000 Gallon Resin Storage Tank	1/1989	None
RMT-4036	11,000 Gallon Resin Storage Tank	1/1989	None
RMT-4037	11,000 Gallon Resin Storage Tank	1/1989	None
RMT-4038	11,000 Gallon Resin Storage Tank	1/1989	None
RMT-4046	10,500 Gallon Resin Storage Tank	1/1995	None
RMT-4047	10,000 Gallon Resin Storage Tank	1/1995	None
RPT-1081	Raw Material Storage Tank	Pre-1972	None
RPT-1082	Raw Material Storage Tank	Pre-1972	None
RPT-1083	Raw Material Storage	Pre-1972	None

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	Tank		
RPT-1084	Raw Material Storage Tank	Pre-1972	None
RPT-1085	Raw Material Storage Tank	Pre-1972	None

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Emission Unit	Description	Date Constructed	Emission Control Equipment
RPT-1086	Raw Material Storage Tank	Pre-1972	None
RPT-1087	Raw Material Storage Tank	Pre-1972	None
RPT-1088	Raw Material Storage Tank	Pre-1972	None
RPT-1091A	Raw Material Storage Tank	Pre-1972	None
RPT-1091B	Raw Material Storage Tank	Pre-1972	None
RPT-2001	Raw Material Storage Tank	Pre-1972	None
RPT-2002	Raw Material Storage Tank	Pre-1972	None
RPT-2003	11,750 Gallon Resin Storage Tank	Pre-1972	None
RPT-2004	11,750 Gallon Resin Storage Tank	Pre-1972	None
RPT-2007	Raw Material Storage Tank	Pre-1972	None
RPT-2008	11,750 Gallon Resin Storage Tank	Pre-1972	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

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

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

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

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

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except

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as provided for motor vehicle air conditioners in Subpart  
B of 40 CFR Part 82:

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

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

5.2.4 Risk Management Plan

- a. This stationary source, as defined in 40 CFR Section 68.3, is subject to 40 CFR Part 68, the Accidental Release Prevention regulations [40 CFR 68.215(a)(1)].
- b. The owner or operator of a stationary source shall revise and update the RMP submitted, as specified in 40 CFR 68.190.

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

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe

operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	120.7
Sulfur Dioxide (SO <sub>2</sub> )	1.3
Particulate Matter (PM)	18.0
Nitrogen Oxides (NO <sub>x</sub> )	10.0
HAP, not included in VOM or PM	----
TOTAL	150

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs. Compliance with these limits shall be based on a running total of 12 months of data.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for HAP Emissions

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The Permittee shall maintain records of the following items to verify that the source is not a major source for HAP emissions so as to demonstrate compliance with the limits in Condition 5.5.2:

- a. Total emissions of each single HAP as calculated by the applicable compliance procedure in Section 7, ton/month and ton/year (12 month rolling average).
- b. Total emissions of all HAPs combined as calculated by the applicable compliance procedure in Section 7, ton/month and ton/year (12 month rolling average).

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM Emissions

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

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6.0 [NOT APPLICABLE TO THIS PERMIT]

7.0 UNIT SPECIFIC CONDITIONS

7.1 Paint Manufacturing

7.1.1 Description

In the paint manufacturing processes, solvent based paints are manufactured. Initial ingredients are added to either a pre-mix tank or a high speed dispersion tank. Large volume materials are added via closed piping systems from above ground storage tanks. Smaller quantity additives are poured into the process tanks. Paint is made of resin, pigments or powders, and a vehicle which is usually a solvent. First the vehicle and the resin are added to the process tank and mixed. Later the dry raw materials are added to the tank. The grinding process is performed by high speed dispersers, vertical sand mills, or enclosed horizontal sand mills. The batch is then placed in a thin down tank for final additions.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit(s)	Description	Emission Control Equipment
Filling Equipment	Equipment for Filling Containers with Paint (9 Filing Points)	None
14 Stationary Mixers (M-1, M-2, M-3, M-4, M-5, M-6, M-7, M-8, M-9, M-10, M-12, M-16, M-17, CM-14)	Equipment for Mixing Paint	Dust Collector (DC-4)
4 Horizontal Mills (SM-6, SM-2, SM-7, SM-4)	Milling of Paint Containing Solvent, Pigment, Resin and Additives	None
3 Vertical Mills (SM-1, SM-5, SM-8)	Milling of Paint Containing Solvent, Pigment, Resin, and Additives	None
Pre-Filters	Vessels for Filtering of Paint Containing Solvent, Pigment, Resin, and Additives	None

61 Blend Tanks	Equipment for Blending Paint	None
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7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected paint manufacturing equipment" for the purpose of these unit-specific conditions, is the paint manufacturing equipment described in Conditions 7.1.1 and 7.1.2.
- b. The affected paint manufacturing equipment is subject to the emission limits and requirements identified in Section 5 of this Permit.
- c. The affected paint manufacturing equipment is subject to 35 IAC 215 Subpart K, Use of Organic Material, which provides that:
  - i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.1.3(c)(ii) (35 IAC 215.302) and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material [35 IAC 215.301].
  - ii. Pursuant to 35 IAC 215.302, emissions of organic material in excess of those permitted by Condition 7.1.3(c)(i) (35 IAC 215.301) are allowable if such emissions are controlled by one of the following methods:
    - A. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)]; or,
    - B. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere [35 IAC 215.302(b)]; or

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- C. Any other air pollution control equipment approved by the Illinois EPA and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere [35 IAC 215.302(c)].
- d. The affected paint manufacturing equipment constructed on or after April 14, 1972 is subject to 35 IAC 212.321, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified subsection (b) or (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321 (a)].

- e. The affected paint manufacturing equipment constructed prior to April 14, 1972 is subject to 35 IAC 212.322, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected paint manufacturing equipment not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected paint manufacturing equipment does not use an add-on control device to achieve compliance with an emission limitation or standard for VOM and because the affected paint manufacturing equipment does not have potential pre-control device emissions of PM that equals or exceeds major source threshold levels.

#### 7.1.5 Operational Production Limits and Work Practices

- a. Emissions shall be vented to the associated pollution control equipment at all times when the affected paint

manufacturing equipment is in operation.

- b. i. The Permittee shall follow good operating practices and procedures for the dust collector, including periodic inspections, routine maintenance, and prompt repair of defects.
- ii. The Permittee shall maintain an adequate supply of replacement filters on the premises of the source.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected paint manufacturing equipment is subject to the following:

Emissions from the below listed affected paint manufacturing equipment combined shall not exceed the following limits:

Filling Equipment  
 SM-6  
 SM-7  
 Pre-Filters

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
4.0	39.9

These limits are based on the maximum number of batches per year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1N].

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission

limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the above listed paint manufacturing equipment below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected paint manufacturing equipment to demonstrate compliance with Conditions 5.5.1, 5.5.2, 7.1.3, 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1, 5.5.2, 7.1.3(c), and 7.1.6:
  - i. Physical properties of each type of material used in the affected paint manufacturing equipment necessary to calculate emissions of VOM, each single HAP and all HAPs combined. These properties include:
    - A. The chemical name of each VOM containing material used.
    - B. The VOM and HAP content of each VOM containing material used, % weight.
    - C. Vapor pressure each VOM containing material used.
    - D. Vapor molecular weight of each VOM containing material used, lb/lb-mol.

- ii. Maximum batch size of each type of paint produced, lbs.
  - iii. Per batch emissions of VOM, each single HAP, and all HAPs combined from each type of paint produced as calculated by the procedure described in Condition 7.1.12(c), lbs/batch.
  - iv. Batch time (hrs).
  - v. The number of batches of each type of paint produced, batches/mo and batches/yr.
  - vi. Combined emissions of VOM from the affected paint manufacturing equipment with emission limits in Condition 7.1.6 tons/mo and tons/yr (12 month rolling average).
  - vii. Emissions of VOM from each affected paint manufacturing equipment, lbs/hr (per batch average).
  - viii. Annual aggregate emissions of VOM and PM from all the affected paint manufacturing equipment combined, ton/year.
- b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6, which shall include:
- i. Identification of the limit that may have been exceeded.
  - ii. Duration of the possible exceedance.
  - iii. An estimate of the amount of emissions in excess of the applicable standard.
  - iv. A description of the cause of the possible exceedance.
  - v. When compliance was reestablished.

#### 7.1.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6. The notification shall include:
  - i. Identification of the limit that may have been exceeded.
  - ii. Duration of the possible exceedance.
  - iii. An estimate of the amount of emissions in excess of the applicable standard.
  - iv. A description of the cause of the possible exceedance.
  - v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
  - i. A summary of exceedances of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6, if any, which required notification to the Compliance Section in accordance with Condition 7.1.10(a).
  - ii. The combined annual emissions of VOM from the affected paint manufacturing equipment with emission limits in Condition 7.1.6 for each month of the previous calendar year, to demonstrate compliance with Condition 7.1.6, tons/year (e.g., for the month of January, the emissions from February, of the preceding calendar year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected paint manufacturing equipment without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the raw materials used and products produced provided the paint manufacturing equipment continues to comply with the Conditions of Section 7.1.
- b. Changes in equipment if they are done solely for the purposes of downsizing, general equipment maintenance, or improved process safety. These changes must not result in an increase in potential emissions of any regulated air pollutant.

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in Condition 7.1.3(d) and (e) (35 IAC 212.321 and 212.322) is assured and achieved by the proper operation, maintenance and work-practices inherent in operation of the affected paint manufacturing equipment, as required by Condition 7.1.5.
- b. Compliance with the emission limits in Conditions 5.5.1, 5.5.2, 7.1.3(c), and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9(a) and the following emissions calculation procedure:

For the purposes of these calculations, paints with similar ingredients and processing steps may be grouped together. For each grouping of paints, a per batch emission rate shall be calculated using the methods and practices presented in: Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, Eastern Research Group, Inc., Prepared for the

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Point Source Committee, Emission Inventory  
Improvement Program, March 1998.

These methods and practices are based on  
engineering methods and fundamental  
vapor/liquid equilibrium relationships,  
including Raoult's law and Dalton's law,  
assuming ideal gas behavior, and accounting  
for batch recirculation.

7.2 Colorant Manufacturing

7.2.1 Description

In the colorant manufacturing processes, water based paints are manufactured. Colorants are manufactured in a similar method to paints, however, the vehicle used is water and glycols.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit(s)	Description	Emission Control Equipment
Filling Equipment	Equipment for Filling Containers with Colorant (2 Filing Points)	None
3 Stationary Mixers (M-23, M-24, M-25)	Equipment for Mixing Waterbased Colorant	Dust Collector (DC-8)
9 Horizontal Mills (SM-4C, SM-5C, SM-1C, SM-3C, SM-6C, SM-7C, SM-8C, SM-9C)	Milling of Colorant Containing Water, Pigment, Glycol, and Additives	None
1 Vertical Mill (SM-2C)	Milling of Colorant Containing Water, Pigment, Glycol and Additives	None
11 Blend Tanks (PT-9C, PT-10C, PT-11C, PT-12C, PT-2C, PT-3C, PT-4C, PT-5C, PT-6C, PT-7C, PT-8C)	Equipment for Blending Colorant	None
2 Vacuum Mixers (VM-1, VM-2)	Mixing of Waterbased Colorant and Vacuuming for Deaeration	None
6 Vacuum Pumps (VP-1, VP-2, VP-3, VP-4, VP-5, VP-6)	Equipment to Deaerate Colorant	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected colorant manufacturing equipment" for the purpose of these unit-specific conditions, is the colorant manufacturing equipment described in Conditions 7.2.1 and 7.2.2.
- b. The affected colorant manufacturing equipment is subject to the emission limits and requirements identified in Section 5 of this Permit.
- c. The affected colorant manufacturing equipment is subject to 35 IAC 215 Subpart K, Use of Organic Material, which provides that:
  - i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.2.3(c)(ii) (35 IAC 215.302) and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material [35 IAC 215.301].
  - ii. Pursuant to 35 IAC 215.302, emissions of organic material in excess of those permitted by Condition 7.2.3(c)(i) (35 IAC 215.301) are allowable if such emissions are controlled by one of the following methods:
    - A. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)]; or,
    - B. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere [35 IAC 215.302(b)]; or
    - C. Any other air pollution control equipment

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approved by the Illinois EPA and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere [35 IAC 215.302(c)].

- d. The affected colorant manufacturing equipment constructed on or after April 14, 1972 is subject to 35 IAC 212.321, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified subsection (b) or (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321 (a)].

- e. The affected colorant manufacturing equipment constructed prior to April 14, 1972 is subject to 35 IAC 212.322, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected colorant manufacturing equipment not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected

colorant manufacturing equipment does not use an add-on control device to achieve compliance with an emission limitation or standard for VOM and because the affected colorant manufacturing equipment does not have potential pre-control device emissions of PM that equals or exceeds major source threshold levels.

7.2.5 Operational Production Limits and Work Practices

- a. Emissions shall be vented to the associated pollution control equipment at all times when the affected colorant manufacturing equipment is in operation.
- b.
  - i. The Permittee shall follow good operating practices and procedures for the dust collector, including periodic inspections, routine maintenance, and prompt repair of defects.
  - ii. The Permittee shall maintain an adequate supply of replacement filters on the premises of the source.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected colorant manufacturing equipment is subject to the following:

Emissions from the below listed affected colorant manufacturing equipment combined shall not exceed the following limits:

Filling equipment

M-23  
M-24  
M-25  
SM-8C  
PT-9C  
PT-10C  
PT-11C  
PT-12C  
VM-2  
VP-1  
VP-2

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VP-3  
VP-4  
VP-5  
VP-6

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
4.0	39.9

These limits are based on the maximum number of batches per year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1N].

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the above listed colorant manufacturing equipment below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected colorant manufacturing equipment to demonstrate compliance with Conditions 5.5.1, 5.5.2, 7.2.3, 7.2.5, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1, 5.5.2, 7.2.3(c), and 7.2.6:
  - i. Physical properties of each type of material used in the affected colorant manufacturing equipment necessary to calculate emissions of VOM, each single HAP and all HAPs combined. These properties include:
    - A. The chemical name of each VOM containing material used.
    - B. The VOM and HAP content of each VOM containing material used, % weight.
    - C. Vapor pressure each VOM containing material used.
    - D. Vapor molecular weight of each VOM containing material used, lb/lb-mol.
  - ii. Maximum batch size of each type of colorant produced, lbs.
  - iii. Per batch emissions of VOM, each single HAP, and all HAPs combined from each type of colorant produced as calculated by the procedure described in Condition 7.2.12(c), lbs/batch.
  - iv. Batch time (hrs).
  - v. The number of batches of each type of colorant produced, batches/mo and batches/yr.
  - vi. Combined emissions of VOM from the affected colorant manufacturing equipment with emission limits in Condition 7.2.6 tons/mo and tons/yr (12 month rolling average).
  - vii. Emissions of VOM from each affected colorant manufacturing equipment, lbs/hr (per batch average).

- viii. Annual aggregate emissions of VOM and PM from all the affected colorant manufacturing equipment combined, ton/year.
- b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6, which shall include:
  - i. Identification of the limit that may have been exceeded.
  - ii. Duration of the possible exceedance.
  - iii. An estimate of the amount of emissions in excess of the applicable standard.
  - iv. A description of the cause of the possible exceedance.
  - v. When compliance was reestablished.

#### 7.2.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6. The notification shall include:
  - i. Identification of the limit that may have been exceeded.
  - ii. Duration of the possible exceedance.
  - iii. An estimate of the amount of emissions in excess of the applicable standard.
  - iv. A description of the cause of the possible exceedance.

- v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
  - i. A summary of exceedances of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6, if any, which required notification to the Compliance Section in accordance with Condition 7.2.10(a).
  - ii. The combined annual emissions of VOM from the affected colorant manufacturing equipment with emission limits in Condition 7.2.6 for each month of the previous calendar year, to demonstrate compliance with Condition 7.2.6, tons/year (e.g., for the month of January, the emissions from February, of the preceding calendar year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected colorant manufacturing equipment without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the raw materials used and products produced provided the colorant manufacturing equipment continues to comply with the Conditions of Section 7.2.
- b. Changes in equipment if they are done solely for the purposes of downsizing, general equipment maintenance, or improved process safety. These changes must not result in an increase in potential emissions of any regulated air pollutant.

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7.2.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in Condition 7.2.3(d) and (e) (35 IAC 212.321 and 212.322) is assured and achieved by the proper operation, maintenance and work-practices inherent in operation of the affected colorant manufacturing equipment, as required by Condition 7.2.5.
- b. Compliance with the emission limits in Conditions 5.5.1, 5.5.2, 7.2.3(c), and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9(a) and the following emissions calculation procedure:

For the purposes of these calculations, colorants with similar ingredients and processing steps may be grouped together. For each grouping of colorants, a per batch emission rate shall be calculated using the methods and practices presented in: Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, Eastern Research Group, Inc., Prepared for the Point Source Committee, Emission Inventory Improvement Program, March 1998.

These methods and practices are based on engineering methods and fundamental vapor/liquid equilibrium relationships, including Raoult's law and Dalton's law, assuming ideal gas behavior, and accounting for batch recirculation.

7.3 Resin Production

7.3.1 Description

This equipment is used to produce resins that are used as raw materials in coating manufacturing.

The resin base is produced by reacting various organic chemicals including TDI in several batch reactors. The resin base is then thinned to the required viscosity.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Reactor K-1	3,000 Gallon Capacity Reaction Vessel Used to Make Resins	Scrubber S-1 Condenser C-1
Reactor K-2	1,800 Gallon Capacity Reaction Vessel Used to Make Resins	Scrubber S-1 Condenser C-2
Reactor K-5	5,500 Gallon Capacity Reaction Vessel Used to Make Resins	Condenser C-3
4 Filter Presses (FP-4, FP-1, FP-2, FP-3)	Equipment for Filtering Resin Product	None
6 Thin Tanks (RT-1, RT-2, RT-4, RT-5, RT-6, RT-7)	Equipment Used to Thin Resin to Required Viscosity	RT-1: Condenser C-5 RT-2: Condenser C-6 RT-5: Condenser C-8

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected resin production equipment" for the purpose of these unit-specific conditions, is the resin production equipment described in Conditions 7.3.1 and 7.3.2.
- b. The affected resin production equipment is subject to the emission limits and requirements identified in Section 5 of this Permit.
- c. The affected resin production equipment is subject to 35 IAC 215 Subpart K, Use of Organic Material, which

provides that:

- i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.3.3(c)(ii) (35 IAC 215.302) and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material [35 IAC 215.301].
- ii. Pursuant to 35 IAC 215.302, emissions of organic material in excess of those permitted by Condition 7.3.3(c)(i) (35 IAC 215.301) are allowable if such emissions are controlled by one of the following methods:
  - A. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)]; or,
  - B. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere [35 IAC 215.302(b)]; or
  - C. Any other air pollution control equipment approved by the Illinois EPA and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere [35 IAC 215.302(c)].
- d. The affected paint manufacturing equipment constructed on or after April 14, 1972 is subject to 35 IAC 212.321, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission

unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified subsection (b) or (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321 (a)].

- e. The affected paint manufacturing equipment constructed prior to April 14, 1972 is subject to 35 IAC 212.322, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

#### 7.3.4 Non-Applicability of Regulations of Concern

- a. The affected resin manufacturing equipment is not subject to the NESHAP for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, 40 CFR 63, Subpart F, because the source does not manufacture as a primary product one or more of the chemicals listed in table 1 of 40 CFR 63 Subpart F.
- b. This permit is issued based on the affected resin manufacturing equipment not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected resin manufacturing equipment uses inherent process equipment to control VOM that is not considered a control device because the equipment is used for material recovery and is installed and operated primarily for purposes other than compliance with air pollution regulations and the affected resin

manufacturing equipment does not have potential pre-control device emissions of PM that equals or exceeds major source threshold levels.

7.3.5 Operational Production Limits and Work Practices

- a. Emissions shall be vented to the associated pollution control equipment at all times when the affected resin manufacturing equipment is in operation.
- b. The Permittee shall follow good operating practices and procedures for the condensers and scrubbers, including periodic inspections, routine maintenance, and prompt repair of malfunctions.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected resin manufacturing equipment is subject to the following:

Emissions from the below listed affected resin manufacturing equipment combined shall not exceed the following limits:

- Reactor K-1
- Reactor K-5
- RT-5
- RT-5
- RT-6
- RT-7

<u>(Ton/Month)</u>	VOM Emissions	<u>(Ton/Year)</u>
4.0		39.9

These limits are based on the maximum number of batches per year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1N].

The above limitations are being established in this

permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the above listed resin manufacturing equipment below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected resin production equipment to demonstrate compliance with Conditions 5.5.1, 5.5.2, 7.3.3, 7.3.5, and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 5.5.1, 5.5.2, 7.3.3(c), 7.3.6:
  - i. Physical properties of materials used in the affected resin manufacturing equipment necessary to calculate emissions of VOM, each single HAP and all HAPs combined. These properties include:
    - A. The chemical name of each VOM containing material used.
    - B. The VOM and HAP content of each VOM containing material used, % weight.
    - C. Vapor pressure of VOM containing materials used, mmHg.

- D. Vapor molecular weight of each VOM containing material used, lb/lb-mol.
  - ii. Maximum batch size of each type of resin produced, lbs.
  - iii. Per batch emissions of VOM, each single HAP, and all HAPs combined from each type of resin produced as calculated by the procedure described in Condition 7.3.12(b), lbs/batch.
  - iv. Batch time (hrs).
  - v. The number of batches of each type of resin produced, batches/mo and batches/yr.
  - vi. Combined missions of VOM from each affected resin manufacturing equipment with limits in Condition 7.3.6 tons/mo and tons/yr (12 month rolling average).
  - vii. Emissions of VOM from each affected resin manufacturing equipment, lbs/hr (per batch average).
  - viii. Annual aggregate emissions of VOM from all the affected resin manufacturing equipment combined, ton/year.
- b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6, which shall include:

- i. Identification of the limit that may have been exceeded.
- ii. Duration of the possible exceedance.
- iii. An estimate of the amount of emissions in excess of the applicable standard.
- iv. A description of the cause of the possible exceedance.
- v. When compliance was reestablished.

#### 7.3.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6. The notification shall include:
  - i. Identification of the limit that may have been exceeded.
  - ii. Duration of the possible exceedance.
  - iii. An estimate of the amount of emissions in excess of the applicable standard.
  - iv. A description of the cause of the possible exceedance.
  - v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
  - i. A summary of exceedances of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6, if any,

which required notification to the Compliance Section in accordance with Condition 7.3.10(a).

- ii. The combined annual emissions of VOM from the affected resin manufacturing equipment with emission limits in Condition 7.3.6 for each month of the previous calendar year, to demonstrate compliance with Condition 7.3.6, tons/year (e.g., for the month of January, the emissions from February, of the preceding calendar year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected resin manufacturing equipment without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the raw materials used and products produced provided the resin manufacturing equipment continues to comply with the Conditions of Section 7.3.
- b. Changes in equipment if they are done solely for the purposes of downsizing, general equipment maintenance, or improved process safety. These changes must not result in an increase in potential emissions of any regulated air pollutant.

#### 7.3.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in Condition 7.3.3(d) and (e) (35 IAC 212.321 and 212.322) is assured and achieved by the proper operation, maintenance and work-practices inherent in operation of the affected resin manufacturing equipment, as required by Condition 7.3.5.

- b. Compliance with the emission limits in Conditions 5.5.1, 5.5.2, and 7.3.3(c) shall be based on the recordkeeping requirements in Condition 7.3.9(a) and the following emissions calculation procedure:

For the purposes of these calculations, resins with similar ingredients and processing steps may be grouped together. For each grouping of resin, a per batch emission rate shall be calculated using the methods and practices presented in: Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, Eastern Research Group, Inc., Prepared for the Point Source Committee, Emission Inventory Improvement Program, March 1998.

These methods and practices are based on engineering methods and fundamental vapor/liquid equilibrium relationships, including Raoult's law and Dalton's law, assuming ideal gas behavior, and accounting for batch recirculation.

7.4 Fixed Roof Storage Tanks

7.4.1 Description

The Permittee operates fixed roof storage tanks which contain volatile organic liquids and HAPs.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
RMT-1003	14,500 Gallon Solvent Storage Tank	None
RMT-1004	20,000 Gallon Solvent Storage Tank	None
RMT-1005	10,000 Gallon Solvent Storage Tank	None
RMT-1006	10,000 Gallon Solvent Storage Tank	None
RMT-1007	11,300 Gallon Solvent Storage Tank	None
RMT-1008	11,300 Gallon Solvent Storage Tank	None
RMT-1010	Raw Material Storage Tank	None
RMT-1011	11,750 Gallon Solvent Storage Tank	None
RMT-1012	Raw Material Storage Tank	None
RMT-1013	Raw Material Storage Tank	None
RMT-1014	10,000 Gallon Solvent Storage Tank	None
RMT-1056	Raw Material Storage Tank	None
RMT-1089A	4,000 Gallon Hazardous Waste Storage Tank	None
RMT-1089B	Raw Material Storage Tank	None
RMT-1095	Raw Material Storage Tank	None
RMT-1057	11,000 Gallon TDI Storage Tank	None
RMT-1090	4,000 Gallon Xylene	None

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	Storage Tank	
RMT-3001	Raw Material Storage Tank	None
RMT-3002	Raw Material Storage Tank	None
RMT-4003	Raw Material Storage Tank	None
Emission Unit	Description	Emission Control Equipment
RMT-4004	Raw Material Storage Tank	None
RMT-4005	Raw Material Storage Tank	None
RMT-4006	Raw Material Storage Tank	None
RMT-4007	Raw Material Storage Tank	None
RMT-4008	Raw Material Storage Tank	None
RMT-4009	Raw Material Storage Tank	None
RMT-4010	Raw Material Storage Tank	None
RMT-4011	Raw Material Storage Tank	None
RMT-4012	Raw Material Storage Tank	None
RMT-4013	Raw Material Storage Tank	None
RMT-4014	Raw Material Storage Tank	None
RMT-4024	Raw Material Storage Tank	None
RMT-4025	Raw Material Storage Tank	None
RMT-4026	Raw Material Storage Tank	None
RMT-4029	Raw Material Storage Tank	None
RMT-4030	Raw Material Storage Tank	None
RMT-4031	Raw Material Storage Tank	None
RMT-4032	Raw Material Storage Tank	None

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RMT-4033	Raw Material Storage Tank	None
RMT-4034	Raw Material Storage Tank	None
RMT-4039	Raw Material Storage Tank	None
RMT-4040	Raw Material Storage Tank	None
RMT-4041	Raw Material Storage Tank	None
RMT-4042	Raw Material Storage Tank	None

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Emission Unit	Description	Emission Control Equipment
RMT-4043	Raw Material Storage Tank	None
RMT-4035	11,000 Gallon Resin Storage Tank	None
RMT-4036	11,000 Gallon Resin Storage Tank	None
RMT-4037	11,000 Gallon Resin Storage Tank	None
RMT-4038	11,000 Gallon Resin Storage Tank	None
RMT-4046	10,500 Gallon Resin Storage Tank	None
RMT-4047	10,000 Gallon Resin Storage Tank	None
RPT-1081	Raw Material Storage Tank	None
RPT-1082	Raw Material Storage Tank	None
RPT-1083	Raw Material Storage Tank	None
RPT-1084	Raw Material Storage Tank	None
RPT-1085	Raw Material Storage Tank	None
RPT-1086	Raw Material Storage Tank	None
RPT-1087	Raw Material Storage Tank	None
RPT-1088	Raw Material Storage Tank	None
RPT-1091A	Raw Material Storage Tank	None
RPT-1091B	Raw Material Storage Tank	None
RPT-2001	Raw Material Storage Tank	None
RPT-2002	Raw Material Storage Tank	None
RPT-2003	11,750 Gallon Resin Storage Tank	None
RPT-2004	11,750 Gallon Resin Storage Tank	None

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RPT-2007	Raw Material Storage Tank	None
RPT-2008	11,750 Gallon Resin Storage Tank	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected storage tank" for the purpose of these unit-specific conditions, is a storage tank described in Conditions 7.4.1 and 7.4.2.
- b. Each affected storage tank is subject to the emission limits and requirements identified in Section 5 of this Permit.
- c. Each affected storage tank is subject to 35 IAC 215.122 which provides that:
  - i. The Permittee shall not discharge more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Agency according to the provisions of 35 IAC 201 [35 IAC 215.122(a)].
  - ii. The Permittee shall not load any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Agency according to the provisions of 35 IAC 201, unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2) [35 IAC 215.122(b)].
  - iii. Exception: If no odor nuisance exists the limitations of Conditions 7.4.3(c)(i) and (ii) shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) [35 IAC 215.122(c)].

7.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected storage tanks not being subject to the New Source Performance Standards (NSPS) for Storage Vessels of Petroleum Liquids, 40 CFR Part 60, Subpart K or Ka because no affected storage tank was constructed between 1973 and 1984.
- b. This permit is issued based on the affected storage tanks not being subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels Constructed After July 23, 1984, 40 CFR Part 60, Subpart Kb because no affected storage tank has a capacity over 75 m<sup>3</sup>.
- c. This permit is issued based on the affected storage tanks not being subject to 35 IAC 215.121 because each affected storage tank has a capacity less than 40,000 gallons.
- d. This permit is issued based on each affected storage tank not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each affected storage tank does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Operational Production Limits and Work Practices

- a. Each affected storage tank shall be loaded with volatile organic liquids via a permanent submerged loading pipe or equivalent device approved by the Illinois EPA.

7.4.6 Emission Limitations

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

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

#### 7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected storage tanks to demonstrate compliance with Conditions 5.5.1, 5.5.2, 7.4.3, 7.4.5, and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 5.5.1 and 5.5.2:
  - i. Chemical name and CAS number of each material stored in each affected storage tank.
  - ii. The annual throughput of each material stored in the affected storage tanks gal/mo and gal/yr.
  - iii. The annual aggregate emissions of VOM from each affected storage tank as calculated by the procedure described in Condition 7.4.12, ton/yr.
- b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6, which shall include:
  - i. Identification of the limit that may have been exceeded.
  - ii. Duration of the possible exceedance.
  - iii. An estimate of the amount of emissions in excess of the applicable standard.
  - iv. A description of the cause of the possible exceedance.
  - v. When compliance was reestablished.

#### 7.4.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6. The notification shall include:
  - i. Identification of the limit that may have been exceeded.
  - ii. Duration of the possible exceedance.
  - iii. An estimate of the amount of emissions in excess of the applicable standard.
  - iv. A description of the cause of the possible exceedance.
  - v. When compliance was reestablished.
- b. The Permittee shall submit the following information along with its annual emission report:
  - i. A summary of exceedances of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6, if any, which required notification to the Compliance Section in accordance with Condition 7.4.10(a).

#### 7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected storage tanks without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the volatile organic liquids stored in the

affected storage tanks as long as the tanks continue to comply with the requirements of this permit.

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3(c) is assured as long as the Permittee meets the work practices requirements of Condition 7.4.5(a).
- b. Emissions of VOM and HAPs shall be calculated using the latest version of the USEPA's TANKS computer software.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

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

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

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

### 8.3 Emissions Trading Programs

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

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

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

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in

emissions greater than authorized under the  
Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);

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

- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

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

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

#### 8.6.4 Reporting Addresses

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

- i. Illinois EPA - Air Compliance Section

- Illinois Environmental Protection Agency  
Division of Air Pollution Control

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Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

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ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

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

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

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

#### 9.4 Obligation to Comply With Other Requirements

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

#### 9.5 Liability

##### 9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

#### 9.12.3 Inaccurate Application

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

#### 9.12.4 Duty to Provide Information

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

#### 9.13 Severability Clause

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

#### 9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lb/hr
A	11.42	24.8

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B 0.16 0.16

- c. Limits for Process Emission Units For Which  
Construction or Modification Commenced On or After  
April 19, 1972 [35 IAC 212.321(c)]:

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Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 Emissions of Particulate Matter from Existing Process Emission Units

10.2.1 Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

Where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

- i. Up to process weight rates up to 27.2 Mg/hr (30 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rate in excess of 27.2 Mg/hr (30 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

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- c. Limits for Process Emission Units For Which  
Construction or Modification Commenced Prior to  
April 14, 1972 [35 IAC 212.322(c)]:

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Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.3 Attachment 3 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

10.4 Attachment 4 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or

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- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of

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minor permit modification procedures and a request  
that such procedures be used; and

- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

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Application forms can be obtained from the Illinois EPA website at  
<http://www.epa.state.il.us/air/forms>.

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Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



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

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

<b>Source Information</b>		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. Number:

<b>Owner Information</b>		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip Code:

<b>Operator Information (if different from owner)</b>		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip Code:

<b>Applicant Information</b>	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.



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

22. Technical contact person for application:	23. Contact person's telephone number:
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This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

<b>Summary Of Application Contents</b>	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

<b>Signature Block</b>	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	_____
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.