

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Fox Valley System Inc.
Attn: Thomas Smrt
640 Industrial Drive
Cary, Illinois 60013

Application No.: 84110014
Applicant's Designation: ILEPA1995
Subject: Paint Manufacturing Facility
Date Issued: April 20, 2000
Location: 680 Industrial Drive, Cary

I.D. No.: 111010AAR
Date Received: January 21, 2000
Expiration Date: December 20, 2001

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of paint manufacturing station (comprised of six paint mixers with filters and four paint can filling stations) and aerosol can filling station (comprised of four TERCO and one KP aerosol can filling lines) both controlled by afterburner, six solvent storage tanks, three pressurized propellant storage tanks, and ten plastic molding machines pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. This permit is issued based upon the paint manufacturing operations being subject to the requirements of 35 Ill. Adm. Code Part 218, Subpart AA: Paint and Ink Manufacturing, pursuant to Section 218.620 (b)(2).
- b. The Permittee shall not operate an open-top mill, tank, vat or vessel, with a volume of more than 12 gallons for the production of paint unless:

- i. The mill, tank, vat or vessel is equipped with a cover which completely covers the mill, tank, vat or vessel opening, except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1/2 inch beyond the outer rim of the opening or be attached to the rime.
 - ii. The cover remains closed, except when production, sampling, maintenance, or inspection procedures require access.
 - iii. The cover is maintained in good condition, such that when in place, it maintains contact with the rim of the opening for at least 90% of the circumference of the rim.
- c. The following conditions shall apply to storage tanks storing volatile organic liquid (VOL):
 - i. The tanks storing VOL with a vapor pressure greater than 1.5 psi at 68°F shall be equipped with pressure/vacuum conservation vents set as a minimum at +/-0.029 psi. This control shall be operated at all times.
 - ii. Stationary VOL storage containers with a capacity greater than 250 gallon shall be equipped with a submerged-fill pipe or bottom fill. This control shall be operated at all times.
- d. The Permittee shall, for the purpose of detecting leaks, conduct an equipment monitoring program consistent with the following:
 - i. Each pump shall be checked by visual inspection each calendar week for indication of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, no later than 15 calendar days after the leak is detected.
 - ii. Any pump valve, pressure relief valve, sampling connection, open-ended valve, and flange or connector containing a fluid which is at least 10 percent by weight volatile organic material which appears to be leaking on the basis of sight, smell, or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
 - iii. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.

- iv. When a leak is detected, the owner or operator shall record the date of detection and repair and the record shall be retained at the plant for at least 2 years from the date of each detection or each repair attempt. The record shall be made available to any person upon verbal or written request during business hours.
 - e. The Permittee shall not clean paint manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.
 - f. The Permittee shall not store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere.
3. This permit is issued based upon the aerosol can filling operations being exempt from the requirements of 35 Ill. Adm. Code Part 218, Subpart DD: Aerosol Can Filling. This is consequence of the federally enforceable production and operating limitations, which restrict the facility's potential to emit to less than 25 tons per year from the subject sources.
4. Paint production and VOM emissions from the plant-wide paint manufacturing and aerosol can filling operations shall not exceed the following limits:

Paint Production		Emission Factor	VOM Emissions	
(10 ³ Gal/Mo)	(10 ³ Gal/Yr)	(Lb/10 ³ Gal)	(Ton/Mo)	(Ton/Yr)
300	1,250	21.2	3.2	13.3

These limits define the potential emissions of VOM and are based on the actual emissions determined from the maximum production rate and emission factor derived from the stack test performed at the plant.

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.

5. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

6. This permit is issued based on negligible emissions of VOM from the storage tanks and plastic molding machines. For this purpose, emissions from all such sources shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
7. PM emission from pigment handling operations shall not exceed the following limits:

Pigment Usage		Emission Factor	Control Efficiency	PM Emission	
(Ton/Mo)	(Ton/Yr)	(Wt.%)	(%)	(Ton/Mo)	(Ton/Yr)
5,000	25,000	1	99	0.5	2.5

These limits are based on the maximum production rate and standard emission factors for pigment handling given by AP-42. Compliance with annual limits shall be determined from a running total of 12 months of data.

8. The Permittee shall maintain monthly records of the following items:
 - a. Paint production (gal/mo and gal/yr);
 - b. Names and amount of solvents used (ton/mo and ton/yr);
 - c. VOM and HAP content in the solvents (lb/gal and wt. %);
 - d. Names and amount of propellants used (ton/mo and ton/yr);
 - e. VOM and HAP emission calculations (ton/mo and ton/yr). For the purpose of HAP emission calculations it shall be assumed that 5% of solvents used in paint manufacturing are evaporated and overall control efficiency of the afterburner equal 81.6%.
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
10. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
 - a. Names and amount of solvents used (tons/yr) and their VOM and HAP content (wt. %) from the prior calendar year;
 - b. Paint production rate (10^6 can/yr).
12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Regional Office
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

It should be noted that this permit has been revised to include operation of the afterburner and increase paint production without any increase in VOM emissions. This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:psj

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Paint Manufacturing Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is production of 1,250,000 gallons of paint per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

1. Paint production and VOM emissions from the plant-wide paint manufacturing and aerosol can filling operations shall not exceed the following limits:

<u>Paint Production</u>		<u>Emission Factor</u>	<u>VOM Emissions</u>	
<u>(10³ Gal/Mo)</u>	<u>(10³ Gal/Yr)</u>	<u>(Lb/10³ Gal)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
300	1,250	21.2	3.2	13.3

2. This permit is issued based on negligible emissions of VOM from the storage tanks and plastic molding machines. For this purpose, emissions from all such sources shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

3. PM emission from pigment handling operations shall not exceed the following limits:

<u>Pigment Usage</u>		<u>Emission Factor</u>	<u>Control Efficiency</u>	<u>PM Emission</u>	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Wt.%)</u>	<u>(%)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
5,000	25,000	1	99	0.5	2.5

4. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

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