

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Apollo Colors, Inc.
Attn: Bruce R. Wright
1550 Mound Road
Rockdale, Illinois 60436

<u>Application No.:</u> 96080051	<u>I.D. No.:</u> 197085AAO
<u>Applicant's Designation:</u>	<u>Date Received:</u> August 15, 1996
<u>Operation of:</u> Manufacturing of Organic Pigments and Flush Colors	
<u>Date Issued:</u> January 25, 1999	<u>Expiration Date</u> ² : January 25, 2004
<u>Source Location:</u> 1550 Mound Road, Rockdale, Will County	
<u>Responsible Official:</u> Bruce R. Wright	

This permit is hereby granted to the above-designated Permittee to OPERATE an organic pigments and flush color manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: May 3, 2001
Revision Date Issued: To Be Determined
Purpose of Revision: Minor Modification

This minor modification is being issued to remove emission units from the permit that are no longer in service at the source, and to adjust the source wide emission limits.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued January 25, 1999 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

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

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

DES:RS:psj

cc: Illinois EPA, FOS, Region 1
USEPA

¹ 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.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Apollo Colors, Inc.
1550 Mound Road
Rockdale, Illinois 60436
(815) 744-5650

I.D. No.: 197085AAO
Standard Industrial Classification: 2865, Organic Dyes & Pigments

1.2 Owner/Parent Company

Apollo Colors, Inc.
1550 Mound Road
Rockdale, Illinois 60436

1.3 Operator

Apollo Colors, Inc.
1550 Mound Road
Rockdale, Illinois 60436

Bruce R. Wright
(815) 744-5650

1.4 General Source Description

Apollo Colors, Inc. is located at 1550 Mound Road, Rockdale in Will County. The source conducts operations for the manufacturing of inks. In the pigment department, raw materials are reacted in strike tanks, then heated and/or cooled to produce red and yellow water-based pigments. Furthermore, blue crude (dry pigment) is added with raw materials to grinders, ground with salt to reduce agglomerates and particle size, and flooded with water to produce a blue water-based pigment. All the water-based pigments are pumped through separate filter presses to remove excess process water and produce color "presscakes" (Flush Color Product Intermediates- 20/80% mixtures of pigment and water). The color presscakes and varnishes are added to flushing machines and mixed to separate water from the color presscakes (Flushing). The residual water from the flushing process is poured from the flushing machines, and the remaining color masses are vacuum dried and standardized (reduced with raw materials-varnishes and oils) to flush color products which meets customer requirements. The flush color products are removed from the flushing machines into drums and kits. The drums and kits are transferred to a cleaning station, where solvent (naphtha) is used to remove color spillages, then transferred to the Shipping Department.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
°F	Degree Fahrenheit
ft ³	cubic foot
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	Kilogram
l	Liter
lb	pound
m	meter
mcf	Million Cubic Feet
MG	Megagram
mmBtu	Million British thermal units
mo	Month
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Tons
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
%	Percent
wt%	Weight Percent
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:

4.8 mmBtu/Hour Gas Fired Boiler

Hydrochloric Acid Storage Tanks

Tetrazo Mixing Tanks with Air Scrubber System

Drais Turbulent Mixers

Varnish and Magie Oil Storage 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:

Salt grinders

Tetrazo mixing tanks

Acetic acid storage tank

- 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)].

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)].

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

3.2 Addition of Insignificant Activities

3.2.1 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).

3.2.2 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.

3.2.3 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).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Flusher No.4 (FL-4)	Flush Colors For The Printing industry	1975	None
Flusher No.5 (FL-5)	Flush Colors For The Printing Industry	1975	None
Flusher No.7 (FL-7)	Flush Colors For The Printing Industry	September, 1978	None
Flusher No.8 (FL-8)	Flush Colors For The Printing Industry	January, 1978	None
Flusher No.9 (FL-9)	Flush Colors For The Printing Industry	January, 1978	None
Flusher No.10(FL-10)	Flush Colors For The Printing Industry	August, 1978	None
Flusher No.11(FL-11)	Flush Colors For The Printing Industry	April, 1995	None
Flusher No.12(FL-12)	Flush Colors For The Printing Industry	August, 1987	None
Flusher No.13(FL-13)	Flush Colors for The Printing Industry	June, 1990	None
Boiler No.3(BLR-3)	12.5 mmBtu/hr Natural Gas Fired Boiler	October, 1988	None
Boiler No.4(BLR-4)	41.85 mmBtu/hr Natural Gas Fired Boiler	August, 1997	None
Fugitive VOM emissions Drum Cleanup (FDC-1)	Solvent Cleaning of Finished Product Packaging Drums	1975	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 sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

5.2.3 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 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 This stationary source, as defined in 40 CFR Part 68 Section 68.3, is subject to Part 68, the Accidental Release Prevention regulations. A Risk Management Plan (RMP) shall be submitted by the date specified in Section 68.10. The source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.5 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

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

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)	84.04
Sulfur Dioxide (SO ₂)	0.12
Particulate Matter (PM)	2.59
Nitrogen Oxides (NO _x)	27.59
HAP, not included in VOM or PM	----
Total	114.34

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.

5.5.3 Other Source-Wide Emission Limitations

- a. The annual emissions from the source, not considering twelve flushers (Nos. 4, 5, 7, 8, 9, 10, 12 and 13) and the gas fired boilers shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)	Underlying Rules
VOM	10.96	35 IAC Part 203

The limits on VOM emissions are limitations established pursuant to 35 IAC Part 203. These limits ensure that the construction/modification of the flusher No.11 does not constitute a new major source or major modification pursuant to 35 IAC Part 203. This condition supersedes the negligible emission limitation established for this flusher in Construction Permit 95010060. See Condition 7.1.6.

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).

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 Operating Scenarios

N/A

5.6.3 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 noncompliance 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.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating 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.

Total VOM emissions from the source shall be calculated based on the following:

$$E_T = E_F + E_o$$

Where:

E_T = Total VOM emissions, in pounds/month

E_F = VOM emissions from all flushers, in pounds/month

E_o = VOM emissions from all other VOM-containing materials (e.g., cleanup solvents in pounds/month)

and

E_F = (0.011 lbs of VOM)X lbs of flush color produced

Where:

0.011 lbs of VOM is the factor developed based on emission tests using Method 24 of USEPA 40 CFR 60, Appendix A.

$$E_o = \sum_{j=1}^n U_j V_j - \text{(VOM containing material reclaimed for reuse or sent off site for disposal X VOM content)}$$

Where:

U_j = Usage of VOM-containing material j , in lb/month

V_j = VOM content of VOM-containing material j , in weight percent

and the summation Σ is over all VOM-containing materials j (other than materials used to produce flush colors).

Gas combustion emissions for units with firing rate less than 100 mmBtu/hr

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
NO _x	100.0
CO	84.0
PM	7.6
VOM	5.5
SO ₂	0.6

These are emission factors for uncontrolled natural gas combustion for small boilers (less than 100 mmBtu/hr), Tables 1.4.1 and 1.4.2, AP-42, Volume I, Supplement D, March, 1998.

6.0 Emission Reduction Market System (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they holds to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:

- i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
- ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 304 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 34.4908 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

The source was issued a construction permit prior to January 1, 1998 for the following new or modified emission units for which three years of operational data is not yet available:

Emission Unit	Construction Permit #	Date Issued	Maximum Available Allotment	Explanation of Maximum Allotment
Boiler No. 4 (BLR-4)	97040032	June 23, 1997	0.42 tons/season	Based on maximum firing rate of the boiler and using AP-42 factors as indicated in Condition 5.9.1.

In accordance with 35 IAC 205.310(h) and 205.320(f), the source shall submit a written request for, or an application for, a revised emissions baseline and allotment which address these emission units by December 1 of the year of the third complete seasonal allotment period in which each such newly constructed or modified emission unit is operational. Such submittal shall include information from the affected emission units on the seasonal emissions for these first three seasonal allotment periods.

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1 12 Flushers Nos.4, 5, 7, 8, 9, 10, 12, and 13 [Mixers for production of flush colors].

Group 2 Flusher No. 11 [Mixer for production of flush colors].

7.1.1 Description

The Permittee is a manufacturer of flush colors (inks). The color presscakes and varnishes are added to flushing machines and mixed to separate water from the color presscakes (Flushing). The residual water from the flushing process is poured from the flushing machines, and the remaining color masses are vacuum dried and standardized (reduced with raw materials-varnishes and oils) to flush color products which meets customer requirements. The flush color products are removed from the flushing machines into drums and kits. The drums and kits are transferred to a cleaning station, where solvent (naphtha) is used to remove color spillages, then transferred to the Shipping Department.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Flushers 4, 5, 7, 8, 9, 10, 12, and 13	Mixers for production of flush colors	None
Flusher No.11 (FL-11)	Mixer for production of flush colors	None
Fugitive VOM emissions, drum cleanup (FDC-1)	Solvent cleaning of finished product packaging drums	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected flusher" for the purpose of these unit specific conditions is a mixer used for production of flush colors (inks). As of the "date issued" as shown on page 1 of this permit, the affected flushers are identified in Condition 7.1.2.
- b. Each affected flusher is subject to the limits identified in Condition 5.2.2.
- c. Each affected flusher at the source is subject to 35 IAC 212.321(a), which requires that:

- i. 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)].
- ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected press shall not exceed the allowable emission rates specified in the following equation

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

Where:

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

A. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rates in excess of 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms
or pounds per hour [35 IAC 212.321].

d. Each affected flusher and associated equipment used in the production of inks are subject to the following requirements for leak detection [35 IAC 218.628].

- i. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent VOM by weight 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.
- ii. 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.
- iii. When a leak is detected, the Permittee shall record the date of detection and repair and the record shall be retained at the source for at least two 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 clean up operation of each flusher and associated equipment used in the production of inks is subject to the following requirements [35 IAC 218.630]:

- i. The Permittee shall not clean ink 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.
- ii. 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.

- f. The affected flushers at the source are subject to 35 IAC 218.301 which requires that:

The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any one of the subject flusher. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected flushers and the associated equipment used in the production of inks are not subject to 35 IAC 218.624, 218.625 and 218.628(a). The requirements of these sections is not applicable, as the inks produced at the source contain Magie oil and glycol as the primary solvent.

7.1.5 Operational and Production Limits and Work Practices

- a. The amount of inks produced using flusher No.11 (FL-11) shall not exceed the following limits:

Inks Production	
<u>(T/mo)</u>	<u>(T/yr)</u>
99.12	991.2

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected flusher No.11 is subject to the following:

- a. Emissions of VOM from the operation of flusher No.11 (FL-11) shall not exceed the following limits:

VOM Emissions From Flusher	
<u>(T/mo)</u>	<u>(T/yr)</u>
1.1	10.96

The emission limits are based on the maximum ink production allowed using this flusher and using an emission factor of 0.011 lb per pound of ink produced.

The above limitations in Conditions 7.1.6 (a) are established pursuant to 35 IAC Part 203. These limits supersedes the negligible emission limits established in Construction Permit 95010060, and they ensure that the Construction/modification of flusher No.11 does not constitute a new major source or major modification. 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 months total).

7.1.7 Testing Requirements

Testing for VOM emissions from the flushers shall be performed as follows [40 CFR 60, Appendix A, Method 24]

- a. Upon reasonable request by the Illinois EPA, the VOM emissions from the operation of the flushers shall be determined according to USEPA Reference Methods 24 of 40 CFR 60 Appendix A.
- b. Upon reasonable request by the Illinois EPA, the VOM content of the cleanup solvents used shall be determined according to USEPA Reference Methods 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

7.1.8 Monitoring Requirements

The Permittee shall conduct an equipment monitoring program for equipment used in the production of inks, as required by Condition 7.1.3(d).

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 each affected flusher to demonstrate compliance with Conditions 5.5.1, 7.1.4, 7.1.5 and 7.1.6, of this section, pursuant to Section 39.5(7)(b) of the Act:

- a. Within 30 days of a written request from the Illinois EPA, the Permittee shall submit records that document that the ink manufacturing operation is exempt from the requirements of 35 IAC 218.624, 218.625 and 218.628(a). These records shall include (but are not limited to) the percent water (by weight) in the ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced [35 IAC 218.637].
- b. Amount of ink produced from each flusher in tons per month and tons per year.
- c. Maximum ink production in an hour from each flusher.
- d.
 - i. Type and amount of each cleanup solvent used in pounds per month and tons per year.
 - ii. VOM content of each cleanup solvent used.
 - iii. Amount of cleanup solvent reclaimed for reuse or sent offsite for disposal, and VOM content of the reclaimed solvent.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected flusher 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:

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the flushers and the work-practices inherent in operation of the flushers.
- b. Compliance with the VOM emission limitations shall be determined from the maximum inks produced and using the average emission factor of 0.011 pounds per pound of ink produced.

7.2 Unit 1 - Boiler 3 (BLR-3) - Natural Gas Fired Boiler, with a maximum design heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr and constructed, modified or reconstructed before June 9, 1989.

Unit 2 - Boiler 4 (BLR-4) - Natural Gas Fired Boiler, with a maximum design heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr and constructed, modified or reconstructed after June 9, 1989.

7.2.1 Description

Natural gas fired boiler are used to produce steam at the source.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Boiler (BLR-3)	Natural gas-fired boiler rated at 12.5 mmBtu/hr firing rate, and constructed prior to June 9, 1989.	None
Boiler (BLR-4)	Natural gas-fired boiler rated at 41.85 mmBtu/hr firing rate, and constructed after June 9, 1989	None

7.2.3 Applicable Provisions and Regulations

- a. An affected boiler for the purpose of these unit specific conditions is a steam generating unit that is fired with natural gas, with a maximum heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr. Boiler (BLR-4) was constructed after June 9, 1989. As a consequence, the affected boiler (BLR-4) is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc because the boiler was constructed after June 9, 1989 and the firing rates of the affected boiler is less than 100 mmBtu/hr and greater than 10 mmBtu/hr. Boiler (BLR-3) was constructed prior to June 9, 1989, hence it is not subject to the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc. As of the "date issued" as shown page 1 of this permit, the affected boilers are

identified in Condition 7.2.2.

- b. The affected boilers are subject to the limits identified in Condition 5.2.2(a).
- c. The emission of carbon monoxide (CO) into the atmosphere from the affected boilers with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air. [35 IAC 216.121]

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to 35 IAC 217.141, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).
- b. Pursuant to 35 IAC 218.303, the affected boilers, i.e., fuel combustion emission units, are not subject to 35 IAC 218.301, Use of Organic Material.
- c. There are no applicable requirements for particulate matter or sulfur dioxide for affected boilers firing natural gas.
- d. The New Source Performance Standards 40 CFR 60, Subpart Dc are not applicable to boiler (BLR-3), as this boiler was constructed prior to June 9, 1989.

7.2.5 Operational and Production Limits and Work Practices

- a. The affected boilers shall only be fired by natural gas as the fuel.
- b. The natural gas consumption from boiler (BLR-3) shall not exceed the following limits:

Fuel Consumption for Boiler (BLR-3)	
<u>(mcf/mo)</u>	<u>(mcf/yr)</u>
9.0	57.02

These limitations are set for the purpose of establishing emissions for fees based on the maximum fuel usage and are not federally enforceable.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the affected boilers are subject to the following:

There are no specific emission limitations for the boilers, however, there are source wide emission limitations in Condition 5.5 that include this boiler.

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1, 5.5.3 and 7.2.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for boiler (BLR-4) in ft³/day [40 CFR 60.48c(g)].
- b. Total natural gas usage for boiler (BLR-3) in mcf/month and mcf/year.
- c. Annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected boilers, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable control and operating requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act:

None

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance provisions addressing CO limitations in Condition 7.2.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected boilers.

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 July 8, 1998 (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].

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 without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA,

emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and 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 [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. 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;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. 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

A report summarizing required monitoring 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]:

Monitoring Period

Report Due Date

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);
- 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
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153
 - 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.

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)(p)(ii) of the Act]:

- 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; 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.

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 compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions of means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. 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)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Equipment

TABLE 1-1

Unit Number	Date Installed	Emission Unit Number	Description
1	1975	Flusher No.1 (FL-1)	Mixer used to produce flush colors (inks)
2	1975	Flusher No.2 (FL-2)	Mixer used to produce flush colors (inks)
3	1975	Flusher No.3 (FL-3)	Mixer used to produce flush colors (inks)
4	1975	Flusher No.4 (FL-4)	Mixer used to produce flush colors (inks)
5	1975	Flusher No.5 (FL-5)	Mixer used to produce flush colors (inks)
6	Oct., 1978	Flusher No.6 (FL-6)	Mixer used to produce flush colors (inks)
7	Sep., 1978	Flusher No.7 (FL-7)	Mixer used to produce flush colors (inks)
8	Jan., 1978	Flusher No.8 (FL-8)	Mixer used to produce flush colors (inks)
9	Jan., 1978	Flusher No.9 (FL-9)	Mixer used to produce flush colors (inks)
10	Aug., 1978	Flusher No.10(FL-10)	Mixer used to produce flush colors (inks)
11	April, 1995	Flusher No.11(FL-11)	Mixer used to produce flush colors (inks)
12	Aug., 1987	Flusher No.12(FL-12)	Mixer used to produce flush colors (inks)
13	June, 1990	Flusher No.13(FL-13)	Mixer used to produce flush colors (inks)
14	Oct., 1988	Boiler No.3(BLR-3)	12.5 mmBtu/hr gas fired boiler
15	Aug., 1997	Boiler No.4(BLR-4)	41.85 mmBtu/hr gas fired boiler
16	1975	Drum Cleanup (FDC-1)	Solvent cleaning of finished product packaging drum

10.2 Attachment 2 - 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: _____

RS:psj