

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

R. R. Street & Company, Inc.
Attn: James Schulte
2353 South Blue Island Avenue
Chicago, Illinois 60608

Application No.: 87080007

I.D. No.: 031600FGH

Applicant's Designation: STREETS

Date Received: March 15, 2010

Subject: Chemical Blending/Processing

Date Issued: October 28, 2014

Expiration Date: October 28, 2024

Location: 2353 S. Blue Island Avenue, Chicago, Cook County 60608

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of eleven (11) mixing/blending tanks, one (1) drum scale, eleven (11) fill stations (fill stations FS-4 and FS-5 each controlled by a bag filter), and twenty-one (21) storage tanks (< 40,000 gallons, each) as described in 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:
- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). 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.
 - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirements for 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - iii. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart RR (Miscellaneous Organic Chemical Manufacturing Processes) and 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units).

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
 - c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
 - d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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 in 35 Ill. Adm. Code 212.321(c).
- 3a. Pursuant to 35 Ill. Adm. Code 218.122(a), no person shall cause or allow the discharge of 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 Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with 35 Ill. Adm. Code 218.108.
- b. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of 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 Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).

- c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall only apply to photochemically reactive material.
- 4a. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63 Subpart FFFF. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs.
- b. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing Area Sources, 40 CFR 63 Subpart VVVVVV. The chemical manufacturing process units (CMPU) at this source do not use as feedstocks, generates as byproducts, or produces as products any of the hazardous air pollutants (HAP) listed in Table 1 to 40 CFR 63 Subpart VVVVVV.
- c. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Chemical Preparations Industry, 40 CFR 63 Subpart BBBB because the source does not manufacture a chemical preparation. Pursuant to 40 CFR 63.11588, chemical preparation means a target HAP-containing (metal compounds for chromium, lead, manganese, and nickel) product, or intermediate used in the manufacture of other products, manufactured in a process operation described by the NAICS code 325998.
- 5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 6a. This permit is issued based on the storage tanks at this source not being subject to 35 Ill. Adm. Code 218.120 (Control Requirements for

Storage Containers of VOL). Pursuant to 35 Ill. Adm. Code 218.119, the limitations of 35 Ill. Adm. Code 218.120 shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gallons) capacity or greater.

- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 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).
- c. This permit is issued based on the cleaning operations at this source not being subject to the requirements of 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012: Except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- d. This permit is issued based on the mixing/blending tanks at this source not being subject to 35 Ill. Adm. Code 218 Subpart V (Batch Operations and Air Oxidation Processes). Pursuant to 35 Ill. Adm. Code 218.500(a)(1), the control requirements set forth in 35 Ill. Adm. Code 218.501 shall apply to process vents associated with batch operations at sources identified by any of the following four-digit standard industrial classification ("SIC") codes, as defined in the 1987 edition of the Federal Standard Industrial Classification Manual: SIC 2821, 2833, 2834, 2861, 2865, 2869, and 2879.
- e. This permit is issued based on the blending operations not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart QQ (Miscellaneous Organic Chemical Manufacturing Processes). This is a result of the federally enforceable production and emissions limits of this permit, which restrict the potential to emit for VOM to less than 25 tons per year.
- f. This permit is issued based on the fill stations not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units). This is a result of the federally enforceable production and emission limits of this permit, which restrict the potential to emit for VOM to less than 25 tons per year.

- 7a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.

- 8a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the bag filter associated with fill stations FS-4 and FS-5 such that the bag filter is kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- 9a. Operation of the Chemical Blending and Processing facility shall not exceed the following limits:

- i. Raw material usage rates and VOM emissions from the 11 mixing/blending tanks shall not exceed the following limits:

Maximum Process Weight	Maximum Production		VOM Emissions	
Rate Per Tank (lb/Batch)	(Batches/Yr)	(Tons/Yr)	(lb/Batch)	(Tons/Yr)
12,545	2,749	7,065	1.2	0.15

These limits based on maximum production, and standard emission estimation formulas and factors (Section 7.1, AP-42, Fifth Edition, Volume I, November 2006) or the use of the TANKS program, Version 4.09D (October, 2005).

- ii. Product fill rates and VOM emissions from the 11 fill stations shall not exceed the following limits:

Maximum Fill Rate per Station (lb/Hour)	Total Annual Fill Rate (Tons/Year)	VOM Emissions	
(lb/Hour)	(Tons/Year)	(Tons/Month)	(Tons/Year)
7,100	7,155	0.59	5.9

These limits based on maximum production, and maximum percentage of volatilization.

- iii. Throughput and VOM emissions from the storage tanks shall not exceed the following limits:

Product	Total Annual Throughput	Total Monthly Throughput	VOM Emissions	
	(Gal/Yr)	(Gal/Mo)	(Tons/Mo)	(Tons/Yr)
MIPA	52,100	4,342	0.04	0.50
Trichloroethylene	142,500	11,875	0.04	0.50

These limits are based on maximum throughputs, vapor pressures, and standard emission factors (Section 7.1, AP-42, Fifth Edition, Volume I, November 2006) or the use of the TANKS program, Version 4.09D (October, 2005).

- iv. All other tanks storing materials with vapor pressures less than 1.0 psia shall not exceed monthly throughputs of 15,200 gallon/month each.
 - v. This permit is issued based on negligible emissions of volatile organic materials from the other nineteen storage tanks. For this purpose, emissions from each such units shall not exceed normal emission rates of 0.1 lb/hour and 0.44 tons/year.
- b. This permit is issued based on negligible emissions of particulate matter (PM) from fill stations FS-4 and FS-5. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
 - c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. 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.
 - d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month and the preceding 11 months (running 12 month total).
10. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- a. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - b. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the

emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

11. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
12. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- 13a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2):

- i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;
 - ii. The VOM content of each cleaning solution as applied in each cleaning operation;
 - iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and
 - iv. The total monthly VOM emissions from cleaning operations at the source;
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- 14a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the bag filter associated with fill stations FS-4 and FS-5:
 - A. Records for periodic inspection of the bag filter associated with fill stations FS-4 and FS-5 with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Number of batches for each type of product (batches/month and batches/year);
 - iii. Chemical name and weight of each raw material per batch per tank (lbs/batch);
 - iv. VOM and HAP content of each batch (% by weight);
 - v. Finished product throughput per batch (gal/batch)
 - vi. Hours of operation of each batch (hours/batch);
 - vii. Material stored in each storage tank and throughput of material of each storage tank (gal/month and gal/yr);
 - viii. Fill rate of each filling unit (lb/month and lb/year);
 - ix. Monthly and annual emissions of PM, VOM and HAP emissions from the the source with supporting calculations (tons/month and tons/year).

- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) 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 or USEPA request for records during the course of a source inspection.

- 15a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.

- b. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.

- 16a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records 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 or deviation. 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 deviation and efforts to reduce emissions and future occurrences.

- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
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 Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

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If you have any questions on this, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:VJB:jws

cc: Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the chemical blending and processing 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. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such 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 less material is handled, and control measures are more effective than required in this permit.

<u>Process</u>	E M I S S I O N S (Tons/Year)			
	<u>PM</u>	<u>VOM</u>	<u>Single HAP</u>	<u>Combined HAPs</u>
11 Mixing/Blending Tanks		0.15		
11 Fill Stations		5.90		
Fill Stations FS-4 and FS-5	0.88			
18 Storage Tanks				
MIPA (1)		0.50		
Trichloroethylene (1)		0.50		
Other (19)		<u>8.36</u>	<u>--</u>	<u>--</u>
Total	<u>0.88</u>	<u>15.41</u>	<u>9.0</u>	<u>22.5</u>