

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE -- RENEWAL

PERMITTEE

Gold Eagle Co  
Attn: Mike Profetto  
4400 South Kildare Avenue  
Chicago, Illinois 60632-4370

<u>Application No.:</u> 02040082	<u>I. D. No.:</u> 031600GLY
<u>Applicant's Designation:</u>	<u>Date Received:</u> February 22, 2008
<u>Subject:</u> Lubricating Oils and Grease Manufacturing Plant	
<u>Date Issued:</u> July 10, 2012	<u>Expiration Date:</u> July 10, 2022
<u>Location:</u> 4400 South Kildare, Chicago, Cook County, 60632	

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of thirty-nine (39) storage tanks (Tanks 1 - 8: 19,000 gallons (each), Tanks 9 & 10: 20,000 gallons (each), Tank 11: 11,000 gallons, Tanks 12 - 23: 11,875 gallons (each), Tank 24: 6,000 gallons, Tanks H & I: 4,000 gallons (each), Tanks K, L, AA4 & AA5: 2,500 gallons (each), Tanks T, W, AA1 & AA2: 1,500 gallons (each), Tank V: 5,800 gallons, Tank AA3: 2,000 gallons, Tank P1: 3,400 gallons, and Tank A: 8,000 gallons), seventeen (17) product blending/day storage tanks (Tanks D, R & S: 1,500 gallons (each), Tanks E & F: 5,400 gallons (each), Tanks G, R, X1, Y & Y1: 4,000 gallons (each), Tank M, N & Q: 1,600 gallons (each), Tanks O & P: 8,000 gallons (each), Tanks X2 & Y2: 3,400 gallons (each)), eight (8) container filling lines, a dry material mixing/filling line controlled by a bag filter, and two (2) 10.5 mmBtu/hour natural gas-fired boilers (Boilers 1 and 2) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - 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 requirement 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 establish 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 so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Organic Hazardous Air Pollutants from Synthetic Organic Chemical Manufacturing Industry Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR 63 Subpart G.

- iii. To establish 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 so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Equipment Leaks, 40 CFR 63 Subpart H.
  - iv. To establish 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 so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE.
  - v. To establish federally enforceable production and operating limitations, which restrict a 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 so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63 Subpart FFFF.
  - vi. 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 of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - vii. 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 QQ (Miscellaneous Formulation Manufacturing Process), 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 permits for this location.
- 2. Boilers 1 and 2 are subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subparts A and Dc. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
  - 3a. 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), 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).
- 4. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
- 5a. 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 218.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of volatile organic liquid with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3 K (70 F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions.
  - d. 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 shall only apply to photochemically reactive material.
- 6a. This permit is issued based on Storage Tanks 9 and 10 not being subject to New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb. Pursuant to 40 CFR 60.110b(b), 40 CFR 60 Subpart Kb does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 15.0 kPa.
- b. This permit is based on the source not being subject to the New Source Performance Standards (NSPS) for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, 40 CFR 60 Subpart VV, and the New Source Performance Standards (NSPS) for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, 40 CFR 60 Subpart VVa, because the source does not produce, as intermediate or final products, one or more of the chemicals listed in 40 CFR 60.489.
- 7a. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE because the organic liquids distribution (OLD) (non-gasoline) operation is not located at, or is part of, a major source of HAP emissions.
- b. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing Area Sources, 40 CFR 63 Subpart VVVVVV because the source does not meet the conditions specified in 40 CFR 63.11494(a)(1). Pursuant to 40 CFR 63.11494(a)(1), except as specified in 40 CFR 63.11494(c), you are subject to 40 CFR 63 Subpart VVVVVV if you own or operate a chemical manufacturing process unit (CMPU) that uses 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 (Table 1 HAP).

- 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 BBBBBBBB because the chemical preparations facility does not have any chemical preparations operation in target HAP service (as defined in 40 CFR 63.11588, "What definitions apply to this subpart?").
- 8. 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.
- 9a. Pursuant to 35 Ill. Adm. Code 218.119(a), 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, except to vessels with a capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true pressure of less than 0.5 psia.
- b. Pursuant to 35 Ill. Adm. Code 218.123(a)(2), the requirements of 35 Ill. Adm. Code 218.123(b) shall not apply to any stationary storage tank with a capacity of less than 151.42 cubic meters (40,000 gal).
- c. 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).
- d. This permit is issued based on the solvent cleaning operations at this source not being subject to the requirements of 35 Ill. Adm. Code 218.187(b). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), 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 from cleaning operations at the source, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in subsection 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;

- e. This permit is issued based upon the emission units not regulated by 35 Ill. Adm. Code Part 218 Subpart B (Organic Emissions from Storage and Loading Operations) not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart QQ (Miscellaneous Formulation Manufacturing Process), Subpart RR (Miscellaneous Organic Chemical Manufacturing Processes), Subpart TT (Other Emission Units). This is a result of the federally enforceable production and operating limitations, which restrict the maximum theoretical emissions to less than 90.7 Mg (100 tons) of VOM per calendar year in the absence of air pollution control equipment and the potential to emit for VOM of potentially affected emission units to less than 25 tons/year.
- 10. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 11a. 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 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.
- c. 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.
- d. 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.
- e. 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.
- 12a. 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 the dry material mixing/filling line such that bag filter is kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
  - c. Boilers 1 and 2 shall only be operated with natural gas as the fuel. The use of any other fuel in the Boilers 1 and 2 requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
  - d. This permit is issued based upon no VOM-containing materials being used for equipment clean-up operations.
- 13a. Emissions and operation of the source shall not exceed the following limits:

<u>Emission Unit(s)</u>	<u>Material Throughput</u>		<u>VOM and HAP Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Ton/Mo</u>	<u>Ton/Yr</u>
Storage Tanks 9 and 11	4,700	47,000	0.01	0.01
Storage Tanks 14 and 15	120,000	1,200,000	0.01	0.12
Storage Tanks 13 and 17	150,000	1,500,000	0.03	0.25
Storage Tank AA3	1,600	16,000	0.01	0.02
Storage Tank 18	150,000	1,500,000	0.02	0.23
All Other Storage and Blending Tanks	450,000	4,500,000	0.22	2.20
Eight Container Filling Lines	1,750,000	14,000,000	0.60	4.70
Fugitives from Spills			0.03	0.32
Fugitives from Leaks			1.14	11.40
			<u>Total:</u>	<u>19.25</u>

These limits are based on the maximum material throughput of the source and the resulting maximum emission rates. VOM and HAP emissions from the storage and blending tanks operations shall be calculated using standard emission factors and formulas (Section 7.1, AP-42 Fifth Edition, Volume I, November 2006 or TANKS Emissions Estimation Software, Version 4.09D, October 5, 2006). Fugitive VOM emissions from the facility operations shall be calculated using standard emission factors and formulas (Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017, November, 1995). The HAP emissions shall be calculated using procedures specified for VOM calculations for respective operations assuming HAP emissions proportional to HAP/VOM ratio in the raw materials.

- b. Operation and emissions of the two boilers (combined) shall not exceed the following limits:
- i. Natural Gas Usage: 15 mmscf/mo, 125 mmscf/yr
  - ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
	<u>(lbs/mmscf)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84.0	0.63	5.25
Nitrogen Oxides (NO <sub>x</sub> )	100.0	0.75	6.25
Particulate Matter (PM)	7.6	0.06	0.48
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.04
Volatile Organic Material (VOM)	5.5	0.04	0.34

These limits are based on the maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- c. This permit is issued based on negligible emissions of particulate matter from the blending operations and the dry material mixing/filling line. For this purpose emissions from each operation shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

- d. 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, the NESHAP for Organic Hazardous Air Pollutants from Synthetic Organic Chemical Manufacturing Industry Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR 63 Subpart G, the NESHAP for Equipment Leaks, 40 CFR 63 Subpart H, the NESHAP for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE, or the NESHAP for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63 Subpart FFFF.
  - e. 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 plus the preceding 11 months (running 12 month total).
- 14a. 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:
- i. 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.
  - ii. 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.
- b. Testing required by Condition 15 shall be performed by a qualified independent testing service.

15. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 16a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
  - b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
- 17a.
  - i. Pursuant to 40 CFR 60.48c(g)(1), except as provided under 40 CFR 60.48c(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.
  - ii. Pursuant to 40 CFR 60.48c(g)(2), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO<sub>2</sub> standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.
  - iii. Pursuant to 40 CFR 60.48c(g)(3), as an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to 40 CFR 60 Subpart Dc) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO<sub>2</sub> standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total

amount of each steam generating unit fuel delivered to that property during each calendar month.

- b. Pursuant to 40 CFR 60.48c(i), all records required under 40 CFR 60.48 shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
18. 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.
19. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
20. 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.

- 21a. 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 the dry material mixing/filling line:
    - A. Records for periodic inspection of the bag filter associated with the dry material mixing/filling line 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. For each storage or blending tank and container filling lines:
    - A. Names and identification number of materials transferred and/or stored;
    - B. Material throughput (gal/mo, gal/yr);
    - C. VOM and HAP content (wt.%);
  - iii. Natural gas usage (mmscf/mo, mmscf/yr); and
  - iv. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAPs from 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.
22. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 23a. 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 subsection (a)(2) of this Section, 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.
- 24a. 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, IL 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

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

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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

ECB:VJB:jws

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the lubricating oils and grease manufacturing plant 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 per year for any single HAP, and 25 tons per year for any combination of such HAP) at which this source would be considered a major source for purposes 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>Emission Unit</u>	E M I S S I O N S (Tons/Year)						Single <u>HAP</u>	Combined <u>HAPs</u>
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>			
Storage Tanks 9 & 11					0.01		0.01	
Storage Tanks 14 & 15					0.12		0.12	
Storage Tanks 13 & 17					0.25		0.25	
Storage Tank AA3					0.02		0.02	
Storage Tank 18					0.23		0.23	
All Other Storage and Blending Tanks					2.20		2.20	
Eight Container Filling Lines					4.70		4.70	
Fugitives from Spills					0.32		0.32	
Fugitives from Leaks					<u>11.40</u>		<u>11.40</u>	
Two Boilers	5.25	6.25	0.48	0.04	0.34			
Blending Operations Dry Material			0.44					
Mixing/Filling Line	--	--	<u>0.44</u>	--	--	--	--	
Totals	<u>5.25</u>	<u>6.25</u>	<u>1.36</u>	<u>0.04</u>	<u>19.59</u>	<u>9.0</u>	<u>22.50</u>	