

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

True Value Manufacturing Company
Attn: Kevin O'Brien
201 Jandus Road
Cary, Illinois 60013

Application No.: 76030127 I.D. No.: 111010AAP
Applicant's Designation: Date Received: June 21, 2004
Subject: Latex, Brush-On, & Aerosol Paint Manufacturing
Date Issued: Expiration Date:
Location: 201 Jandus Road, Cary, McHenry County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

Four (4) Dispersion Tanks (T-432, T-433, T-434, and T-435);
Latex Paint Dispersing and Reducing Tanks with Dust Collectors;
Four (4) Mills (AG-440, AG-441, AG-430, and AG-431);
Twelve (12) Thindown Tanks (T-270, T-271, T-272, T-280, T-281, T-282, T-290, T-291, T-292, T-260, T-261, and T-262);
Finished Product Storage and Packaging Operations and Dry Material Handling Operations Controlled by Dust Collector;
Two (2) Thru-The-Valve Aerosol Can Filling Lines with Gas Houses;
F-style Blending and Filling Operation;
Chemical Products Mixing and Filling Line
Fifty-three (53) Liquid Storage Tanks (T-101: 15,440 Gallons, T-102: 20,000 Gallons, T-103T: 6,584 Gallons, T-103M: 5,874 Gallons, T-103B: 4,768 Gallons, T-104T: 6,584 Gallons, T-104M: 5,874 Gallons, T-104B: 4,768 Gallons, T-105: 15,440 Gallons, T-106: 15,440 Gallons, T-107: 15,440 Gallons, T-108: 15,440 Gallons, T-109: 15,440 Gallons, T-110: 15,440 Gallons, T-111: 15,440 Gallons, T-112: 15,400 Gallons, T-130: 15,000 Gallons, T-131: 10,000 Gallons, T-132: 10,000 Gallons, T-133: 12,000 Gallons, T-134: 12,000 Gallons, T-135: 14,000 Gallons, T-136: 14,000 Gallons, T-137: 10,000 Gallons, T-138: 10,000 Gallons, T-139: 12,000 Gallons, T-140: 12,000 Gallons, T-141: 6,000 Gallons, T-142: 6,000 Gallons, T-301: 25,000 Gallons, T-302: 25,000 Gallons, T-303: 25,000 Gallons, T-304: 25,000 Gallons, T-601: 4,700 Gallons, T-602: 4,700 Gallons, T-603: 4,700 Gallons, T-604: 4,700 Gallons, T-702: 2,000 Gallons, T-706: 5,150 Gallons, T-707: 5,150 Gallons, T-708: 5,150 Gallons, T-899: 5,150 gallons, T-900: 5,150 Gallons, T-901: 5,150 Gallons, T-902: 5,150 Gallons, T-903: 5,150 Gallons, T-904: 5,150 Gallons, T-113: 7,600 Gallons, T-114: 11,000 Gallons, T-720: 12,000 Gallons, T-721: 12,000 Gallons, T-722: 12,000 Gallons, and T-723: 8,000 Gallons);
Filling Operation;
Chemical Products Mixing and Filling Line;
Brush On Oil Paint Manufacturing Operation;
Paint Brush Manufacturing Operation
Paint Roller Manufacturing Operation; and
Four (4) 11,480 ft³ Powder Tanks (T-501, T-502, T-503, and T-504)

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 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 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 Miscellaneous Coating Manufacturing, 40 CFR 63, Subpart HHHHH.
 - iii. 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 requirement of 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.
 - 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) issued 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 meter (1000 foot) 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).
- 4a. Pursuant to 35 Ill. Adm. Code 218.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) 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 gallons/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 liters (250 gallons), 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/hour (8 lbs/hour) 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 this 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.
- d. This source is subject to 35 Ill. Adm. Code 218, Subpart AA (Paint and Ink Manufacturing). Pursuant to 35 Ill. Adm. Code 218.620(b)(1), 35 Ill. Adm. Code 218 Subpart AA shall also apply to all paint and ink manufacturing sources which:
 - i. Have the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from process emission units that:
 - A. Are not regulated by 35 Ill. Adm. Code 218 Subparts B, E, F, H, Q, R, S, T (excluding 35 Ill. Adm. Code 218.486), V, X, Y, Z, or BB, or

- B. Are not included in any of the following categories:
 - synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations, or
 - ii. Produce more than 1,892,705 liters (500,000 gallons) per calendar year of paint or ink formulations which contain less than 10% (by weight) water, and ink formulations not containing as the primary solvents water, Magie oil or glycol.
5. This permit is issued based on the storage tanks at this source 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 m³ 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 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa.
- 6a. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing, 40 CFR 63, Subpart HHHHH. 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 Paints and Allied Products Manufacturing, 40 CFR 63 Subpart CCCCCC because the concrete curing compound mixing system M13 does not processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607.
7. 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/hour (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.
- 8a. 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 for VOL. Pursuant to 35 Ill. Adm. Code 218.119(f),

the limitations of 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL) 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 storage capacity less than 40,000 gallons must comply with 35 Ill. Adm. Code 218.129(f).

- 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 solvent cleaning operations at this source not being subject to 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). 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 6.8 kg/day (15 lbs/day) or more of VOM from cleaning operations at the source, in the absence of air pollution control equipment. 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;
- b. Pursuant to 35 Ill. Adm. Code 218.621, the requirements of 35 Ill. Adm. Code 218.624 and 218.625 and 35 Ill. Adm. Code 218.628(a) shall not apply to equipment while it is being used to produce either:
 - i. Paint or ink formulations which contain 10 percent or more (by weight) water; or
 - ii. Inks containing Magie oil and glycol as the primary solvent.
- 9a. 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.
- 10a. Pursuant to 35 Ill. Adm. Code 218.624, no person shall operate an open-top mill, tank, vat or vessel with a volume of more than 45 liters (12 gallons) for the production of paint or ink unless:
 - i. The mill, tank, vat or vessel is equipped with a cover which completely covers the mill, tank, vat or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1.27 cm (0.5 inches) beyond the outer rim of the opening or be attached to the rim.

- ii. The cover remains closed except when production, sampling, maintenance, or inspection procedures require access.
 - iii. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.
- b. Pursuant to 35 Ill. Adm. Code 218.625(a), no person shall operate a grinding mill for the production of paint or ink which is not maintained in accordance with the manufacturer's specifications.
- c. Pursuant to 35 Ill. Adm. Code 218.625(b), no person shall operate a grinding mill fabricated or modified after the effective date of 35 Ill. Adm. Code 218 Subpart AA which is not equipped with fully enclosed screens.
- d. Pursuant to 35 Ill. Adm. Code 218.626(a), the owner or operator shall equip tanks storing VOL with a vapor pressure greater than 10 kPa (1.5 psi) at 20°C (68°F) with pressure/vacuum conservation vents set as a minimum at +/-0.2 kPa (0.029 psi). This control shall be operated at all times. An alternative air pollution control system may be used if it results in a greater emission reduction than these controls. An alternative air pollution control system may be used if it results in a greater emission reduction than these controls. Any alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.
- e. Pursuant to 35 Ill. Adm. Code 218.626(b), stationary VOL storage containers with a capacity greater than 946 liters (250 gallons) shall be equipped with a submerged-fill pipe or bottom fill. This control shall be operated at all times. An alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.
- f. Pursuant to 35 Ill. Adm. Code 218.628, the owner or operator of a paint or ink manufacturing source shall, for the purpose of detecting leaks, conduct an equipment monitoring program as set forth below:
 - i. Each pump shall be checked by visual inspection each calendar week for indication of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
 - ii. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent by weight VOM which appears to be leaking on the basis of sight, smell, or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
 - iii. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on

which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.

- g. Pursuant to 35 Ill. Adm. Code 218.630(a), no person shall clean paint or 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.
- h. Pursuant to 35 Ill. Adm. Code 218.630(b), no person shall 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.
- 11a. 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 dust collectors such that the dust collectors are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- c. The storage tanks at this source with a capacity greater than 39,889.98 gallons (151 m³) shall only be used to store volatile organic liquids with a vapor pressure not to exceed 0.5 psi (3.5 kPa). The storage of any volatile organic liquid with a vapor pressure greater than 0.5 psi in a tank with a capacity greater than 39,889.98 gallons (151 m³) requires that the Permittee first obtain a construction permit from the Illinois EPA and may require performance testing to verify compliance with all applicable requirements.
- 12a. Emissions of VOM and operation of the Latex, Brush-On, & Aerosol Paint Manufacturing plant shall not exceed the following limits:

| Emission Unit | Production Rate | | VOM Emissions | | | |
|------------------------|-----------------|------------------|--------------------------------|----------|----------|--|
| | (Per Month) | (Per Year) | Emission Factor | (Ton/Mo) | (Ton/Yr) | |
| Latex Paint Mfg. | 2,500,000 Gal | 25,000,000 Gal | 3.73 x 10 ⁻⁶ lb/Gal | 0.01 | 0.05 | |
| Aerosol Paint Filling | 2,000,000 Cans | 20,000,000 Cans | 2.99 x 10 ⁻⁴ lb/Can | 0.30 | 2.99 | |
| F-Style Mfg. | 200,000 Gal | 2,000,000 Gal | 1.31 x 10 ⁻³ lb/Gal | 0.13 | 1.31 | |
| Chemical Products Mfg. | 500,000 Gal | 5,000,000 Gal | 8.10 x 10 ⁻⁵ lb/Gal | 0.02 | 0.20 | |
| Brush Mfg. | 600,000 units | 6,000,000 units | 5.68 x 10 ⁻⁴ | 0.17 | 1.70 | |
| | | | lb/unit | | | |
| Roller Core Mfg. | 1,000,000 units | 10,000,000 units | 3.80 x 10 ⁻⁵ | 0.02 | 0.19 | |
| | | | lb/unit | | | |

| Emission Unit | Production Rate | | VOM Emissions | | |
|--|-----------------|----------------|------------------------------|----------|----------|
| | (Per Month) | (Per Year) | Emission Factor | (Ton/Mo) | (Ton/Yr) |
| Aerosol Concentrate Brush On: Oil Based | 60,000 Gal | 600,000 Gal | 1.19×10^{-2} lb/Gal | 0.36 | 3.57 |
| Paint Mfg. Brush On: VM&P Based | 200,000 Gal | 2,000,000 Gal | 1.05×10^{-2} lb/Gal | 1.05 | 10.50 |
| Paint Production Brush On: Oil Based | 25,000 Gal | 250,000 Gal | 1.20×10^{-2} lb/Gal | 0.15 | 1.50 |
| & VP&M Paint Filling | 225,000 Gal | 2,250,000 Gal | 2.00×10^{-4} lb/Gal | 0.02 | 0.23 |
| Clean-up Min. Spirits | 5,000 Gal | 50,000 Gal | -- | 0.07 | 0.73 |
| Clean-up Toluene | 5,000 Gal | 50,000 Gal | -- | 0.06 | 0.60 |
| Storage Tanks | | | | 0.08 | 0.80 |
| Latex Polymer | 1,512,000 Gal | 15,120,000 Gal | | ----- | ----- |
| Toluene | 12,000 Gal | 120,000 Gal | | ----- | ----- |
| Petroleum Distillates | 24,000 Gal | 240,000 Gal | | ----- | ----- |
| All Other materials (< 1.0 psia) | 305,000 Gal | 3,050,000 Gal | | ----- | ----- |
| | | | | Total: | 24.37 |

These limits are based on the maximum production rates, the actual emissions determined from stack test data (for latex manufacturing and aerosol can filling), factors derived from the equations provided by Emission Inventory Improvement Program (EIIP) Volume 2: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities (February, 2005), mass balance calculations assuming total release of chemicals (for roller core and brush manufacturing), or the use of the TANKS program, Version 4.09D (October, 2005) for the storage tanks.

- b. Emissions of PM and operation of the paint manufacturing operation shall not exceed the limits:

| Material | Material Usage | | | PM Emissions | |
|----------|----------------|-------------|-----------|--------------|-------------|
| | (Tons/Month) | (Tons/Year) | (Lbs/Ton) | (Tons/Month) | (Tons/Year) |
| Pigment | 1,820 | 18,200 | 20 | 1.82 | 18.20 |

These limits are based on the maximum pigment usage rate, standard emission factors (Table 6.4-1, AP-42, Fifth Edition, Volume I, May 1983), and a control efficiency of 90%.

- 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 and the NESHAP for Miscellaneous Coating Manufacturing, 40 CFR 63 Subpart HHHHH.

- 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 plus the preceding 11 months (running 12 month total).
- 13a. 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 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
14. 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.
15. 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.

16. 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.
- 17a. 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.
- b. Pursuant to 35 Ill. Adm. Code 218.625(c), the manufacturer's specifications shall be kept on file at the plant by the owner or operator of the grinding mill and be made available to any person upon verbal or written request during business hours.
- c. Pursuant to 35 Ill. Adm. Code 218.628(d), when a leak is detected, the owner or operator shall record the date of detection and repair and the record shall be retained at the 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.

- d. Pursuant to 35 Ill. Adm. Code 218.637(b), every owner or operator of a source which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart AA shall maintain all records necessary to demonstrate compliance with those requirements at the source for three years.
- 18a. 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 dust collectors:
 - A. Records for periodic inspection of the dust collectors 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. Latex paint produced (gallons/month and gallons/year);
 - iii. Type and amount of each solvents containing VOM and/or HAP used in each Manufacturing Area (tons/month and tons/year);
 - iv. Type and amount of pigment used in production operation (tons/month and tons/year);
 - v. Number of aerosol paint cans filled (cans/month and can/year);
 - vi. Amount of toluene and propellant used in the aerosol paint filling operation (tons/month and tons/year);
 - vii. Type and amount of each product filled in the F-Style production operation (gallons/month and gallons/year);
 - viii. Type and amount of each solvent used in the F-Style production operation (tons/month and tons/year);
 - ix. Type and amount of each chemical product produced in the chemical production operation (gallons/month and gallons/year);
 - x. Type and amount of each solvent used in the chemical production operation (tons/month and tons/year);
 - xi. Amount of roller cores produced in the roller core manufacturing operation (units/month and units/year);
 - xii. Amount of brushes produced in the brush manufacturing operation (units/month and units/year);
 - xiii. Type and amount of each solvent used in the brush manufacturing operation (tons/month and tons/year);

- xiv. Name and throughput of each material stored in each storage tank excluding non-VOM materials (such as washwater and exempt solvents) and pressurized tanks (gallons/month and gallons/year); and
 - xv. Monthly and annual emissions of PM, VOM, total HAPs, and each individual HAP, 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 the Illinois EPA or USEPA request for records during the course of a source inspection.
19. 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.
- 20a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1), 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 comply with the following:
- i. By April 1, 2011, or upon initial start-up of the source, whichever is later, submit a certification to the Illinois EPA that includes:
 - A. A declaration that the source is exempt from the requirements of this Section because of the criteria in 35 Ill. Adm. Code 218.187(a)(1);
 - B. Calculations that demonstrate that combined emissions of VOM from cleaning operations at the source never equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment;
 - ii. Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.637(a), upon request by the Illinois EPA, the owner or operator of an emission source which claims to be exempt from the requirements of 35 Ill. Adm. Code 218 Subpart AA shall

submit records to the Illinois EPA within 30 calendar days from the date of the request which document that the emission source is in fact exempt from 35 Ill. Adm. Code 218 Subpart AA. These records shall include (but are not limited to) the percent water (by weight) in the paint or ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced.

21a. 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

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 - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

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

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

Date Signed: _____

ECB:RBS:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Latex, Brush-on, & Aerosol Paint Manufacturing Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels (e.g., 100 tons/year of 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>Emission Unit</u> | E M I S S I O N S (Tons/Year) | | | <u>Total</u> |
|---|-------------------------------|--------------|-----------------------------|--------------|
| | <u>PM</u> | <u>VOM</u> | <u>Single</u> <u>HAP</u> | |
| Latex Paint Mfg. | | 0.05 | | |
| Aerosol Paint Filling | | 2.99 | | |
| F-Style Mfg. | | 1.31 | | |
| Chemical Products Mfg. | | 0.20 | | |
| Brush Mfg. | | 1.70 | | |
| Roller Core Mfg. | | 0.19 | | |
| Aerosol Concentrate | | 3.57 | | |
| Brush On: Oil Based Paint Mfg. | | 10.50 | | |
| Brush On: VM&P Based Paint Production | | 1.50 | | |
| Brush On: Oil Based & VP&M Paint Filling | | 0.23 | | |
| Clean-up Min. Spirits | | 0.73 | | |
| Clean-up Toluene | | 0.60 | | |
| Storage Tanks | | 0.80 | | |
| Pigment Usage | <u>18.20</u> | <u>-----</u> | <u>-----</u> | <u>-----</u> |
| Totals: | 18.20 | 24.34 | 9.0 | 22.5 |

RBS:psj