

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Daubert Chemical Company
Attn: Mr. Mark Pawelski
4700 South Central Avenue
Chicago, Illinois 60638

Application No.: 73090167

I.D. No.: 031821AAS

Applicant's Designation:

Date Received: June 3, 2013

Subject: Paint Manufacturing

Date Issued: January 8, 2014

Expiration Date: May 14, 2023

Location: 4700 South Central Avenue, Chicago, Cook County, 60638

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) natural gas-fired boilers (8.3 mmBtu/hour, each), fifty-three (53) storage tanks (including two (2) 6,000 gallon product storage tanks), metal working, and an industrial coating, adhesive manufacturing processes (including three (3) PUR reactors (two (2) 300 gallon and 1,500 gallon) with a vacuum pump), one (1) 80 gallon grease pilot reactor with a vacuum pump system, V-DAMP process which includes three (3) mixers controlled by dust collector and two (2) silos, one (1) Batch Chemical Reactor (Tank 41) with condenser and one (1) 7,500 gallon batch chemical mixer (Tank 76). 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 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 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 being 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.

- iv. 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).
 - 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. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Paints and Allied Products Manufacturing, 40 CFR 63 Subparts A and CCCCCC. The Illinois EPA is administering the NESHAP in Illinois on behalf of the USEPA under a delegation agreement. Pursuant to 40 CFR 63.11599(a), you are subject to 40 CFR 63 Subpart CCCCCC if you own or operate a facility that performs paints and allied products manufacturing that is an area source of hazardous air pollutant (HAP) emissions and processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607.
- b. Pursuant to 40 CFR 63.11600(a), if you own or operate an existing affected source, you must achieve compliance with the applicable provisions in 40 CFR 63 Subpart CCCCCC by December 3, 2012.
- 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 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), 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).
- 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 Part 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 Part 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 218.187(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. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b)(1), (b)(2), or (b)(3). No owner or operator of a source that manufactures

coatings, inks, adhesives, or resins shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in at least one of the following subsections: 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5).

- i. The VOM content of the as-used cleaning solutions does not exceed the following emissions limitations:

	kg/l	lb/gal
Cleaning of equipment used in the manufacture of coatings, inks, adhesives, or resins	0.20	1.67

- ii. The VOM composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);
- iii. For sources that manufacture coatings, inks, adhesives, or resins, the owner or operator complies with the following work practices:
 - A. Equipment being cleaned is maintained leak-free;
 - B. VOM-containing cleaning materials are drained from the cleaned equipment upon completion of cleaning;
 - C. VOM-containing cleaning materials, including waste solvent, are not stored or disposed of in such a manner that will cause or allow evaporation into the atmosphere; and
 - D. VOM-containing cleaning materials are stored in closed containers;
- iv. Sources that manufacture coatings, inks, adhesives, or resins may utilize solvents that do not comply with 35 Ill. Adm. Code 218.187(b)(1) or (b)(2) provided that all of the following requirements are met:
 - A. No more than 228 l (60 gal) of fresh solvent is used per calendar month. Solvent that is reused or recycled, either onsite or offsite, for further use in equipment cleaning or in the manufacture of coatings, inks, adhesives, or resins, shall not be included in this limit;
 - B. Solvents, including cleanup solvents, are collected and stored in closed containers; and
 - C. Records are maintained in accordance with 35 Ill. Adm. Code 218.187(e)(6).

- e. 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 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.

- f. 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)(2), 35 Ill. Adm. Code 218 Subpart AA shall also apply to all paint and ink manufacturing source s 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.
- g. 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). These controls 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. Any alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.
- h. 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. These controls 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.
- 5. This permit is issued based on the 21,500 gallon storage tank #403 and 7 new storage tanks (404, 303, 305, 307, 308, 311 and 315) 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 HHHHHH. 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. Pursuant to 40 CFR 63.11494(c)(1)(i), 40 CFR 63 Subpart VVVVVV does not apply to affected sources under the following chemical manufacturing area source categories listed pursuant to Clean Air Act (CAA) section 112(c)(3) and 112(k)(3)(B)(ii) that are subject to area source standards under 40 CFR Part 63: Manufacture of Paint and Allied Products, subject to 40 CFR 63 Subpart CCCCCC.
- 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 bulk storage tanks, reactors, dispenser mixer, and the R&D reactor and small mixer do 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.
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 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 Batch Chemical Reactors at this source not being subject to 35 Ill. Adm. Code 218.501 (Control Requirements for Batch Operations) because the source is not 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.
- d. 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.
- e. This permit is issued based upon the operations of this source not being subject to the requirements of VOM control in 35 Ill. Adm. Code 218, Subpart QQ (Miscellaneous Formulation Manufacturing Process). This is a result of the conditions in this permit which constrain maximum theoretical emissions to less than 100 tons per year VOM and potential to emit to less than 25 tons per year.
- 9a. Pursuant to 40 CFR 63.11601(a), for each new and existing affected source, you must comply with the requirements in 40 CFR 63.11601(a)(1) through (5). These requirements apply at all times.
 - i. You must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.
 - ii. You must capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form.
 - iii. You must:

- A. Capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or
 - B. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form.
- iv. You must:
- A. Capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(5) during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
 - B. Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
 - C. Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
- v. The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere.
- b. Pursuant to 40 CFR 63.11601(b), For each new and existing affected source, you must comply with the requirements in 40 CFR 63.11601(b)(1) through (5).
- i. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the requirements of 40 CFR 63.11601(b)(1)(i) through (iii).
 - A. The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process.
 - B. The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the

process vessel. The resulting ratio must not exceed 90-percent.

- C. The covers or lids must be maintained in good condition.
- ii. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft.
- iii. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if:
 - A. All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and
 - B. No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel.
- iv. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection.
- v. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- c. Pursuant to 40 CFR 63.11605, Table 1 of 40 CFR 63 Subpart CCCCCC (see Attachment B) shows which parts of the General Provisions in 40 63.1 through 63.16 apply to you.
- 10a. 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.
- 11a. Pursuant to 35 Ill. Adm. Code 218.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 218.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.187(e).

- b. Pursuant to 35 Ill. Adm. Code 218.187(d), the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.187 shall comply with the following for each subject cleaning operation. Such requirements are in addition to work practices set forth in 35 Ill. Adm. Code 218.187(b)(4) and (b)(5), as applicable:
 - i. Cover open containers and properly cover and store applicators used to apply cleaning solvents;
 - ii. Minimize air circulation around the cleaning operation;
 - iii. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
 - iv. Utilize equipment practices that minimize emissions;
 - v. When using cleaning solvent for wipe cleaning, sources that manufacture coatings, inks, adhesives, or resins shall:
 - A. Cover open containers used for the storage of spent or fresh organic compounds used for cleanup or coating, ink, adhesive, or resin removal; and
 - B. Cover open containers used for the storage or disposal of cloth or paper impregnated with organic compounds that are used for cleanup or coating, ink, adhesive, or resin removal.
- c. 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 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 in) 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.
- d. 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.
- e. 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.
- f. 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). These controls 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. Any alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.
 - g. 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. These controls 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.
 - h. 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 VOM by weight which appears to be leaking on the basis of sight, smell, or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
 - 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.
 - i. 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.
 - j. 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.

- 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 nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the dust collectors associated with the three mixers and the condenser associated with the Batch Chemical Reactor (Tank 41) such that the dust collectors and condenser are kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- 13a. Total combined emissions and operation of the metal working, industrial coating, V-DAMP process and adhesive manufacturing processes (including Three (3) PUR reactors (two (2) 300 gallon and one (1) 1,500 gallon) with a vacuum pump), one (1) 7,500 gallon batch chemical mixer (Tank 76) and the Batch Chemical Reactor (Tank 41), including all clean up operations, shall not exceed the following limits:

Production Rate		VOM Emissions		PM Emissions	
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
1,686,220	16,862,200	2.2	22.44	0.45	3.0

These limits are based on emission factors that were derived from formulas and models contained in the Emission Inventory Improvement Program (EIIP), Vol. II, Chapter 16: Methods for Estimating Air Emissions for Chemical Manufacturing Facilities: August 2007 (i.e., VOM emissions occur from vapor displacement during loading of liquid raw materials into a batch vessel, heating of raw materials in the vessel, mixing of batch material and transfer of batch material from the batch vessel to another container). PM emissions calculated using standard emission factors (Table 6.4-1 "Uncontrolled Emission Factors for Paint and Varnish Manufacturing," AP-42, Fifth Edition, Volume I, May 1983).

- b. Emissions and operation of the 53 storage tanks (including two (2) 6,000 gallon product storage tanks) shall not exceed the following limits:

Throughput		VOM Emissions	
<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
840,000	8,400,000	0.08	0.8

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).

- c. Emissions from operation of the 4 boilers and another non-process gas-fired sources at the plant shall not exceed the following limits:
 - i. Natural Gas Usage: 30 mmscf/month, 330 mmscf/year.
 - ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor</u> (lbs/mmscf)	<u>Emissions</u>	
		(Tons/Mo)	(Tons/Yr)
Carbon Monoxide (CO)	84.0	1.39	13.86
Nitrogen Oxides (NO _x)	100.0	1.65	16.50
Particulate Matter (PM)	7.6	0.13	1.25
Sulfur Dioxide (SO ₂)	0.6	0.01	0.10
Volatile Organic Material (VOM)	5.5	0.09	0.91

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

- d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act 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 is not subject to the NESHAP for Miscellaneous Coating Manufacturing, 40 CFR 63, Subpart HHHHH.
 - 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 Conditions 14 and 15 shall be performed upon a written request from the Illinois EPA 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 35 Ill. Adm. Code 218.187(g)(1), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.187 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218.187. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during the testing.
- b. Pursuant to 35 Ill. Adm. Code 218.187(g)(2), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.187(b)(1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:
 - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used, provided, however, Method 24 shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for cleaning solvents may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a), however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method

24 test and the manufacturer's specifications, the Method 24 test shall govern;

- c. Pursuant to 35 Ill. Adm. Code 218.187(g)(3), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110.
- 17a. Pursuant to 40 CFR 63.11602(a), for each new and existing affected source, you must demonstrate initial compliance by conducting the inspection and monitoring activities in 40 CFR 63.11602(a)(1) and ongoing compliance by conducting the inspection and testing activities in 40 CFR 63.11602(a)(2).
- b. Pursuant to 40 CFR 63.11602(a)(1), you must conduct an initial inspection of each particulate control device according to the requirements in 40 CFR 63.11602(a)(1)(i) through (iii) and perform a visible emissions test according to the requirements of 40 CFR 63.11602(a)(1)(iv). You must record the results of each inspection and test according to 40 CFR 63.11602(b) and perform corrective action where necessary. You must conduct each inspection no later than 180 days after your applicable compliance date for each control device which has been operated within 60 days following the compliance date. For a control device which has not been installed or operated within 60 days following the compliance date, you must conduct an initial inspection prior to startup of the control device.
 - i. For each wet particulate control system, you must verify the presence of water flow to the control equipment. You must also visually inspect the system ductwork and control equipment for leaks and inspect the interior of the control equipment (if applicable) for structural integrity and the condition of the control system.
 - ii. For each dry particulate control system, you must visually inspect the system ductwork and dry particulate control unit for leaks. You must also inspect the inside of each dry particulate control unit for structural integrity and condition.
 - iii. An initial inspection of the internal components of a wet or dry particulate control system is not required if there is a record that an inspection meeting the requirements of 40 CFR 63.11602(a)(1) has been performed within the past 12 months and any maintenance actions have been resolved.
 - iv. For each particulate control device, you must conduct a visible emission test consisting of three 1-minute test runs using Method 203C (40 CFR Part 51, Appendix M). The visible emission test runs must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If

the average test results of the visible emissions test runs indicate an opacity greater than the applicable limitation in 40 CFR 63.11601(a), you must take corrective action and retest within 15 days.

- c. Pursuant to 40 CFR 63.11602(a)(2), following the initial inspections, you must perform periodic inspections of each PM control device according to the requirements in 40 CFR 63.11602(a)(2)(i) or (ii). You must record the results of each inspection according to 40 CFR 63.11602(b) and perform corrective action where necessary. You must also conduct tests according to the requirements in 40 CFR 63.11602(a)(2)(iii) and record the results according to 40 CFR 63.11602(b).
 - i. You must inspect and maintain each wet particulate control system according to the requirements in 40 CFR 63.11602(a)(2)(i)(A) through (C).
 - A. You must conduct a daily inspection to verify the presence of water flow to the wet particulate control system.
 - B. You must conduct weekly visual inspections of any flexible ductwork for leaks.
 - C. You must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the wet control system (if applicable) to determine the structural integrity and condition of the control equipment every 12 months.
 - ii. You must inspect and maintain each dry particulate control unit according to the requirements in 40 CFR 63.11602(a)(2)(ii)(A) and (B).
 - A. You must conduct weekly visual inspections of any flexible ductwork for leaks.
 - B. You must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.
 - iii. For each particulate control device, you must conduct a 5- minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR Part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, you must conduct a Method 203C (40 CFR Part 51, Appendix

M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in 40 CFR 63.11601(a)(4), you must comply with the requirements in 40 CFR 63.11602(a)(2)(iii)(A) through (C).

A. You must take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. You must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in 40 CFR 63.11601(a)(5).

B. You must prepare a deviation report in accordance with 40 CFR 63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in 40 CFR 63.11601(a)(5).

C. You must resume the visible determinations of emissions from the particulate control device in accordance with 40 CFR 63.11602(a)(2)(iii) 3 months after the previous visible determination.

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.

- 19a. Pursuant to 40 CFR 63.11602(b), you must record the information specified in 40 CFR 63.11602(b)(1) through (6) for each inspection and testing activity.
- i. The date, place, and time;
 - ii. Person conducting the activity;
 - iii. Technique or method used;
 - iv. Operating conditions during the activity;
 - v. Results; and
 - vi. Description of correction actions taken.
- b. Pursuant to 40 CFR 63.11603(c), you must maintain the records specified in 40 CFR 63.11603(c)(1) through (4) in accordance with 40 CFR 63.11603(c)(5) through (7), for five years after the date of each recorded action.
- i. As required in 40 CFR 63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted in accordance with 40 CFR 63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted.
 - ii. You must keep a copy of each Annual Compliance Certification Report prepared in accordance with 40 CFR 63.11603(b).
 - iii. You must keep records of all inspections and tests as required by 40 CFR 63.11602(b).
 - iv. Your records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).
 - v. As specified in 40 CFR 63.10(b)(1), you must keep each record for 5 years following the date of each recorded action.
 - vi. You must keep each record onsite for at least 2 years after the date of each recorded action according to 40 CFR 63.10(b)(1). You may keep the records offsite for the remaining 3 years.

20. 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.

- 21a. 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 218.187(e)(3), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(1) shall collect and record the following information for each cleaning solution used:
 - i. For each cleaning solution that is prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. The VOM content of each cleaning solvent in the cleaning solution;
 - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
 - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
 - E. The VOM content of the as-used cleaning solution, with supporting calculations; and
 - F. A calibration log for the automatic equipment, detailing periodic checks.
 - ii. For each batch of cleaning solution that is not prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. Date, time of preparation, and each subsequent modification of the batch;

- C. The VOM content of each cleaning solvent in the cleaning solution;
 - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
 - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a).
- c. Pursuant to 35 Ill. Adm. Code 218.187(e)(4), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(2) shall collect and record the following information for each cleaning solution used:
- i. The name and identification of each cleaning solution;
 - ii. Date, time of preparation, and each subsequent modification of the batch;
 - iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
 - iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - v. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
- d. Pursuant to 35 Ill. Adm. Code 218.187(e)(6), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(5) shall collect and record monthly the following information for each cleaning operation subject to the requirements of 35 Ill. Adm. Code 218.187(b)(5):
- i. The name, identification, and volume of each VOM-containing cleaning solution as applied in each cleaning operation;
 - ii. The volume of each fresh cleaning solvent used for cleaning coating, ink, adhesive, or resin manufacturing equipment;
 - iii. The volume of cleaning solvent recovered for either offsite or onsite reuse or recycling for further use in the cleaning of coating, ink, adhesive, or resin manufacturing equipment;

- e. 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.
 - f. 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.
 - g. 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.
 - f. 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.
- 22a. 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 associated with the three mixers and the condenser associated with the Batch Chemical Reactor (Tank 41):
 - A. Records for periodic inspection of the dust collectors and condenser 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. Molecular weight and vapor pressure at operating temperature of each VOM and/or HAP containing raw material;
 - iii. Material Safety Data Sheets (MSDS) of all VOM and/or HAP containing material;
 - iv. Production rate for the metal working, industrial coating, V-DAMP process and adhesive manufacturing processes and the Batch Chemical Reactor (Tank 41) (gallons/month and gallons/year);
 - v. All the detailed necessary data to determine VOM and HAP emissions using the methodology specified in Condition 12(a);

- vi. Throughput and vapor pressures of the 54 storage tanks (gallons/month and gallons/year);
 - vii. Natural gas consumption (ft³/month and ft³/year);
 - viii. Amount of clean-up solvent used (gallons/month and gallons/year);
and
 - ix. Monthly and annual CO, NO_x, PM, SO₂, VOM and HAP emissions from the source (tons/month and tons/year) with supporting calculations.
- 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 USPEA request for records during the course of a source inspection.
- 23a. Pursuant to 40 CFR 63.11603(a)(2), if you own or operate an existing affected source, you must submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h) by June 3, 2013. If you own or operate a new affected source, you must submit a Notification of Compliance Status within 180 days after initial start-up, or by June 1, 2010, whichever is later. If you own or operate an affected source that becomes an affected source in accordance with 40 CFR 63.11599(b)(3) after the applicable compliance date in 40 CFR 63.11600 (a) or (b), you must submit a Notification of Compliance Status within 180 days of the date that you commence processing, using, or generating materials containing HAP, as defined in 40 CFR 63.11607. This Notification of Compliance Status must include the information specified in 40 CFR 63.11603(a)(2)(i) and (ii).
- i. Your company's name and address;
 - ii. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart CCCCCC.
- b. Pursuant to 40 CFR 63.11603(b), you must prepare an annual compliance certification report according to the requirements in 40 CFR 63.11603(b)(1) through (b)(3). This report does not need to be submitted unless a deviation from the requirements of 40 CFR 63 Subpart CCCCCC has occurred. When a deviation from the requirements of 40 CFR

63 Subpart CCCCCC has occurred, the annual compliance certification report must be submitted along with the deviation report.

- i. You must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in 40 CFR 63.11603(b)(1)(i) through (iii).
 - A. The first annual compliance certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.
 - B. Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.
 - C. Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.
 - ii. The annual compliance certification report must contain the information specified in 40 CFR 63.11603(b)(2)(i) through (iii).
 - A. Company name and address;
 - B. A statement in accordance with 40 CFR 63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart CCCCCC; and
 - C. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
 - iii. If a deviation has occurred during the reporting period, you must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by 40 CFR 63.11603(b)(1)(iii).
24. 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.

- 25a. Pursuant to 35 Ill. Adm. Code 218.187(e)(2)(B), all sources subject to the requirements of 35 Ill. Adm. Code 218.187 shall at least 30 calendar days before changing the method of compliance between 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(4), or (b)(5) and 35 Ill. Adm. Code 218.187(b)(3), notify the Illinois EPA in writing of such change. The notification shall include a demonstration of compliance with the newly applicable subsection;
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(9), all sources subject to the requirements of 35 Ill. Adm. Code 218.187(b) and (d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.187(b) or (d) by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
- c. 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.
- d. 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.
- 26a. 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

It should be noted that this permit has been revised so as to incorporate operation of the equipment described in Construction Permit 13060001.

If you have any questions on this permit, please call Jocelyn Stakely at 217/785-1705

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

Date Signed: _____

REP:JRS:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from metal working and industrial coating and adhesive manufacturing 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, 25 tons/year of combined HAPs and 10 tons/year of each single 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>Single HAP</u>	<u>Total HAPs</u>
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>			
Metal working and industrial coating, V-DAMP process and adhesive manufacturing processes and Batch Chemical Reactor (Tank 41)			3.00		20.44			
Clean-up operation 80 Gallon Grease Pilot Ractor					2.00			
Storage Tanks					0.44			
Four (4) Boilers					0.80	-----	-----	
	<u>13.86</u>	<u>16.50</u>	<u>1.25</u>	<u>0.10</u>	<u>0.91</u>	-----	-----	
Totals:	13.86	16.50	4.25	0.10	24.59	9.0	22.5	

Attachment B - Table 1 to Subpart CCCCCC of Part 63-Applicability of General Provisions to Paints and Allied Products Manufacturing Area Sources

As required in 40 CFR 63.11599, you must meet each requirement in the following table that applies to you. Part 63 General Provisions that apply for Paints and Allied Products Manufacturing Area Sources:

Citation	Subject	Applies to subpart CCCCCC
63.1	Applicability	Yes.
63.2	Definitions	Yes.
63.3	Units and abbreviations	Yes.
63.4	Prohibited activities	Yes.
63.5	Preconstruction review and notification requirements	No.
63.6(a), (b)(1)-(b)(5), (c), (e)(1), (f)(2), (f)(3), (g), (i), (j)	Compliance with standards and maintenance requirements	Yes.
63.7(a), (e), and (f)	Performance testing requirements	Yes.
63.8	Monitoring requirements	No.
63.9(a)-(d), (i), and (j)	Notification Requirements	Yes.
63.10(a), (b)(1)	Recordkeeping and Reporting	Yes.
63.10(d)(1)	Recordkeeping and Reporting	Yes.
63.11	Control device and work practice requirements	No.
63.12	State authority and delegations	Yes.
63.13	Addresses of state air pollution control agencies and EPA regional offices	Yes.
63.14	Incorporation by reference	No.
63.15	Availability of information and confidentiality	Yes.
63.16	Performance track provisions	