

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)	17
6.1 Description of ERMS	
6.2 Applicability	
6.3 Recordkeeping and Reporting	
7.0 UNIT SPECIFIC CONDITIONS	19
7.1 Specialty Ink Production Process - Large Kettles	
7.2 Specialty Ink Production Process - Small Kettles	
7.3 Packaging Lines	
7.4 Storage Tanks	
8.0 GENERAL PERMIT CONDITIONS	45
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	

1.0 SOURCE IDENTIFICATION

1.1 Source

Videojet Technologies, Inc.
1855 Estes Avenue
Elk Grove Village, Illinois 60007-5413
630/238-3906

I.D. No.: 031440AIW
Standard Industrial Classification: 2893, Printing Ink
Manufacturing

1.2 Owner/Parent Company

Videojet Technologies, Inc.
1500 Mittel Boulevard
Wooddale, Illinois 60191-1073

1.3 Operator

Videojet Technologies, Inc.
1855 Estes Avenue
Elk Grove Village, Illinois 60007-5413

Peter Papantos, Director - Supply Operations
630/238-3906

1.4 General Source Description

Videojet Technologies, Inc., is located at 1855 Estes Avenue in Elk Grove Village, Illinois. The source manufactures specialty printing inks and make-up solutions. Equipment used at the source includes mixing kettles, underground storage tanks for raw materials, and packaging lines for the finished product.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
cm	Centimeter
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
gal	Gallon
HAP	Hazardous Air Pollutant
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
in	Inch
°K	degrees Kelvin
kPa	Kilopascals
kW	Kilowatts
L	Liter
lb	Pound
m ³	cubic meter
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
psia	pounds per square inch
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit

USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

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

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate

matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	5 Mixing Kettles (Greater Than or Equal to 250 Gallon Capacity)	Various (1990-2002)	None
02	26 Mixing Kettles (Less Than 250 Gallon Capacity)	Various (1990-2002)	None
03	Packaging Line	Prior to 2002	None
04	Terco Water Based Product Packaging Line	2002	None
T1	Methyl Ethyl Ketone Underground Storage Tank (10,450 Gallons)	June 1990	None
T2	Methanol Underground Storage Tank (10,450 Gallons)	June 1990	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of 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 the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and

shall be submitted to the Illinois EPA [35 IAC 212.312].

- c. All normal traffic pattern roads and parking facilities located at this source 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 [35 IAC 212.306].

5.2.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.5 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.
- c. This stationary source will be subject to 40 CFR Part 63, Subpart HHHHH, NESHAP for Miscellaneous Coating Manufacturing, when such rule becomes final and effective. The Permittee shall comply with the applicable requirements of such regulation by the date(s) specified in such regulation and shall certify compliance with the applicable requirements of such regulation as part of the annual compliance certification required by 40 CFR Part 70 or 71 beginning in the year that compliance is required under a final and effective rule.

5.2.7 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source does not have a pollutant-specific emissions unit that uses an add-on control device to achieve compliance with an emission limitation or standard.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

5.4.1 Material throughput of the ink production kettles shall not exceed 1,120,000 lb/month and 11,200,000 lb/year of ink solutions (including dyes, pigments, solvents, water, resin, and additives).

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	37.20
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	0.10
Nitrogen Oxides (NO _x)	---
HAP, not included in VOM or PM	---
Total	37.30

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

The annual emissions from the source shall not exceed the following limitations:

Pollutant	Emissions	Underlying Rules
VOM	37.2 Ton/Year	35 IAC Part 203
VOM	4 Ton/Month	35 IAC Part 203

These limits are based on the operational limits in Condition 5.4.1.

The limits on VOM are limitations established in Permit 02040088, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items for the source to quantify annual VOM and HAP emissions, so as to demonstrate compliance with the annual emission limits in Condition 5.5:

- a. Aggregate monthly VOM emissions from emission units included in Section 7 of this permit; and
- b. Aggregate monthly HAP emissions from emission units included in Sections 3 and 7 of this permit, calculated as a fraction of VOM emissions according to vapor weight percent.

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source. This may be included in the annual emissions report required pursuant to Condition 9.7.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

- a. For the purpose of estimating emissions from the storage tanks, the current version of TANKS is acceptable.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent of each HAP for each organic liquid times the VOM emissions contributed by that organic liquid is acceptable.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year

being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.

- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Specialty Ink Production Process - Large Kettles

7.1.1 Description

Solvents and/or water are mixed with pigments, dyes, resins, and additives in mixing kettles ranging in size from 250 gallons to 1,000 gallons. Materials may be added from underground storage tanks by hard piping, or from 55-gallon containers by hand charging. The mixing kettles are kept covered at all times during the production process, except when manually charging the kettles by hand. Neither pigment grinding nor cooking of materials is conducted at the source.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	5 Mixing Kettles (Greater Than or Equal to 250 Gallon Capacity)	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected large kettles" for the purpose of these unit specific conditions, are the mixing kettles, as described in Condition 7.1.1 and 7.1.2, with a capacity greater than or equal to 250 gallons.
- b. The affected large kettles are subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because the source has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate and must comply with the work practices in Condition 7.1.5(a), (b) and (c).
- c. The affected large kettles are subject to 35 IAC Section 218.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302 and with the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.
- d. The affected large kettles are subject to 35 IAC 212.321, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of

particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- e. The affected large kettles are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR 63, Subparts A and HHHHHH because the source manufactures inks, paints, or adhesives and is located at a plant site that is a major source as defined in 40 CFR 63.2. The Illinois EPA is administering NESHAP in Illinois on behalf of the USEPA under a delegation agreement. The affected large kettles shall comply with all applicable requirements for new or reconstructed equipment in 40 CFR 63, Subpart HHHHHH. The affected large kettles constructed after April 4, 2002 shall comply with the proposed standards, pursuant to 40 CFR 63.7995(a)(1), no later than the effective date of Subpart HHHHHH. The affected large kettles constructed on or before April 4, 2002 shall comply with the proposed standards, pursuant to 40 CFR 63.7995(b), no later than three years after the effective date of Subpart HHHHHH.
 - i. The affected large kettles with a capacity greater than 250 gallons shall comply with the emission limitations and work practice standards for process vessels, specified in 40 CFR 63.8000(a)(1).
 - ii. Components associated with the affected large kettles shall comply with the emission limitations and work practice standards for equipment leaks, close-vent systems, and heat exchanger systems, specified in 40 CFR 63.8000(a)(4).

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected large kettles not being subject to 35 IAC 218, Subpart TT, because the requirements of 35 IAC 218, Subpart TT does not apply to a source's VOM emission units which are included within any of the categories specified in 35 IAC 218, Subpart AA [35 IAC 218.980(a)].
- b. This permit is issued based on the affected large kettles not being subject to 35 IAC Part 203, Major Stationary Source Construction and Modification (MSSCAM) because the increase emissions of VOM

associated with the construction of affected large kettles permitted in Permit 02040088 was less than 25 tons per year (see Condition 5.5.3 and Attachment 8).

- c. This permit is issued based on the affected large kettles not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected large kettles do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Operational And Production Limits And Work Practices

- a. The affected large kettles are subject to 35 IAC 218.624, which requires that the kettles be equipped and maintained with covers as follows:
 - i. The affected large kettles shall be 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 [35 IAC 218.624(a)].
 - ii. The cover remains closed except when production, sampling, maintenance or inspection procedures require access [35 IAC 218.624(b)].
 - 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 [35 IAC 218.624(c)].
- b. Components associated with the affected large kettles are subject to 35 IAC 218.628, which requires the following measures with respect to identification and repair of leaking components:
 - i. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquid 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 [35 IAC 218.628(a)].
 - 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 [35 IAC 218.628(b)].

- 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 [35 IAC 218.628(c)].
- c. Clean up of the affected large kettles is subject to 35 IAC 218.630, which requires the following with respect to clean up operations:
- i. 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 [35 IAC 218.630(a)]; and
 - ii. 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 [35 IAC 218.630(b)].
- d. The Permittee must follow the applicable Emission Limitations and Work Practice Standards for the affected large kettles as specified in Table 1, 40 CFR 63, Subpart HHHHH.
- e. The Permittee must follow the applicable Work Practice Standards for Equipment Leaks, Closed-Vent Systems, and Heat Exchange Systems as specified in Table 4, 40 CFR 63, Subpart HHHHH.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected large kettles are subject to the following:

- a. This permit is issued based on negligible emissions of PM from the affected large kettles. For this purpose, emissions shall not exceed 0.1 lb/hr and 0.44 tons/year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). The above limitations were established in Permit 02040088 [T1].

7.1.7 Testing Requirements

- a. The Permittee shall conduct all initial compliance demonstrations required by Tables 9 through 14 of Subpart HHHHH and perform all applicable testing for the affected large kettles as specified by 40 CFR 63.8025. The Permittee shall have emissions tests conducted for the affected large kettles performed by an approved testing service as follows:

- i. Pursuant to 40 CFR 63.8025(b), affected large kettles constructed after April 4, 2002 shall be tested within 180 days after the effective date of 40 CFR 63, Subpart HHHHH.
- ii. Pursuant to 40 CFR 63.8025(a), affected large kettles constructed on or before April 4, 2002 shall be tested prior to the date three years after the effective date of 40 CFR 63, Subpart HHHHH.
- iii. At least every two years thereafter, the Permittee shall perform emission stack test to demonstrate compliance, unless the Permittee relies on more accurate emission estimation.

- b. Testing shall be performed by a qualified independent testing service as follow.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Volatile Organic Material	USEPA Method 25 or 25A

A test shall consist of three separate runs each at least 60 minutes in duration. Compliance shall be determined from the average of the runs provided that the Illinois EPA may accept the arithmetic mean of the two runs in circumstances described in 40 CFR 60.8(f).

- c. At least 60 days prior to the actual date of testing a written test plan shall be submitted to the Illinois EPA for review and approval. A copy shall also be submitted to the USEPA. This plan shall

describe the specific procedures for testing, including:

- i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum operating rate, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.
- d. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the tests. The Illinois EPA may, at its discretion, accept notification with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe the testing.
- e. Three copies of the Final Reports for the emission test shall be forwarded to the Illinois EPA, within 60 days after the completion of testing. The Final Report from testing shall contain a minimum:
- i. A summary of results;
 - ii. General information;
 - iii. Description of test method(s), including a description of sampling points, sampling train, analysis equipment, and test schedule;
 - iv. Detailed description of test conditions, including production data;
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analysis, sample calculations, and data on equipment calibration.

7.1.8 Monitoring Requirements

The Permittee shall perform all applicable monitoring for the affected large kettles as specified in 40 CFR 63.8035 and 63.8045.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected large kettles to demonstrate compliance with Conditions 5.5.1 and 7.1.3 through 7.1.7, pursuant to Section 39.5(7)(b) of the Act:

- a. For the affected large kettles, the Permittee shall maintain:
 - i. All applicable records as specified by 40 CFR 63.8080, on and after the effective date of Subpart HHHHH, Miscellaneous Coating Manufacturing.
 - ii. All records necessary to demonstrate compliance with 35 IAC 218, Subpart AA [35 IAC 218.637(b)].
 - iii. When a leak is detected (see Condition 7.1.5(b)), 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 [35 IAC 218.628(d)].
- b. The Permittee shall maintain a file that includes:
 - i. The maximum emissions of VOM for production of ink, lb emitted/gallons produced including cleanup, by category or subcategory, with supporting documentation and calculations; and
 - ii. The VOM and HAP content of raw materials used in production of ink.
- c. The Permittee shall maintain records of the following items for the source:
 - i. Ink production by category or subcategory (gallons/month and gallons/year);
 - ii. Total ink production (gallons/month and gallons/year);

- iii. Usage of solvent and other VOM containing raw materials by type (gallons/month and gallons/year); and
 - iv. Amount and density of cleanup solvent reclaimed if credit is taken for emission reduction (gallons/month and gallons/year).
- d. The Permittee shall maintain the following records for the source related to emissions:
- i. VOM emissions, tons/month and tons/year, 12-month running total, based in the above data with supporting calculations; and
 - ii. A log identifying each batch of material for which the established emission factor is not believed to fully account for emissions, with explanation and estimate of additional VOM emission in pounds (lb) resulting from such batch due to unique circumstances.

7.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected kettle with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:
- i. If there is an exceedance of the requirements of Conditions 7.1.5 or 7.1.6 as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, IL, within 30 days after the exceedance. 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 violation and efforts to reduce emissions and future occurrences.
 - ii. Report of any violation of the requirements of 35 IAC 218 Subpart AA by sending a copy of any record showing a violation to the Illinois EPA, Compliance Section, within 30 days following the occurrence of the violation.
- b. The Permittee shall submit all applicable notifications and reports for the affected large kettles as specified in 40 CFR 63.8070 and 63.8075.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected large kettles without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in raw materials and ink formulations, as long as such changes do not cause a violation of the emission limitations in Conditions 7.1.5 and 7.1.6.

7.1.12 Compliance Procedures

- a. Compliance of the affected large kettles with the emission limitation in Condition 7.1.3(c) is assumed to be achieved by the work-practices inherent in the operation of the affected large kettles, so that no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with Condition 7.1.3(d) is assumed to be achieved by the work-practices inherent in operation of the affected large kettles.
- c. Compliance with Condition 7.1.6(a) shall be based on the recordkeeping requirements in Condition 7.1.9 the emission factors developed from the most recent emission stack test or emission factors developed from USEPA's Emission Inventory Improvement Program (EIIP).

- i. VOM Emissions from ink manufacturing:

Emissions (lb) = Ink Production (gal) *
Emission Factor (lb/gal
produced).

- ii. VOM Emissions from equipment cleanup operation:

Emissions (lb) = [Solvent usage for equipment
cleanup (gal) - Solvent
reclaimed (gal)] * Solvent
Density (lb/gal).

In case of the solvent reclaimed, the solvent usage for equipment cleanup may be determined from the difference of solvent taken from the inventory for cleanup and solvent reclaimed.

- d. To determine compliance with Condition 7.1.3(e) (see also 40 CFR 63, Subpart HHHHH), the Permittee shall follow the applicable compliance procedures for the affected large kettles specified in 40 CFR 63.8015 through 63.8065.

7.2 Specialty Ink Production Process - Small Kettles

7.2.1 Description

Solvents and/or water are mixed with pigments, dyes, resins, and additives in mixing kettles ranging in size from 5 gallons to 250 gallons. Materials may be added from underground storage tanks by hard piping, or from 55-gallon containers by hand charging. The mixing kettles are kept covered at all times during the production process, except when manually charging the kettles by hand. Neither pigment grinding nor cooking of materials is conducted at the source.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	26 Mixing Kettles (Less Than 250 Gallon Capacity)	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected small kettles" for the purpose of these unit specific conditions, are the mixing kettles, as described in Condition 7.2.1 and 7.2.2, with a capacity less than 250 gallons.
- b. The affected small kettles are subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because the source has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate and must comply with the work practices in Condition 7.2.5(a), (b) and (c).
- c. The affected small kettles are subject to 35 IAC Section 218.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302 and with the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.
- d. The affected small kettles are subject to 35 IAC 212.321, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or

premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected small kettles not being subject to 35 IAC 218, Subpart TT, because the requirements of 35 IAC 218, Subpart TT does not apply to a source's VOM emission units which are included within any of the categories specified in 35 IAC 218, Subpart AA [35 IAC 218.980(a)].
- b. This permit is issued based on the affected small kettles not being subject to 35 IAC Part 203, Major Stationary Source Construction and Modification (MSSCAM) because the increase emissions of VOM associated with the construction of affected small kettles permitted in Permit 02040088 was less than 25 tons per year (see Condition 5.5.3 and Attachment 8).
- c. This permit is issued based on the affected small kettles not being subject to 40 CFR Part 63, Subpart HHHHH, because the affected small kettles have a capacity of less than 250 gallons.
- d. This permit is issued based on the affected small kettles not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected small kettles do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Operational And Production Limits And Work Practices

- a. The affected small kettles are subject to 35 IAC 218.624, which requires that the kettles be equipped and maintained with covers as follows:
 - i. The affected small kettles shall be 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 [35 IAC 218.624(a)];
 - ii. The cover remains closed except when production, sampling, maintenance or inspection procedures require access [35 IAC 218.624(b)]; and

- 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 [35 IAC 218.624(c)].
- b. Components associated with the affected small kettles are subject to 35 IAC 218.628, which requires the following measures with respect to identification and repair of leaking components:
- i. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquid 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 [35 IAC 218.628(a)];
 - 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 [35 IAC 218.628(b)]; and
 - 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 [35 IAC 218.628(c)].
- c. Clean up of the affected small kettles is subject to 35 IAC 218.630, which requires the following with respect to clean up operations:
- i. 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 [35 IAC 218.630(a)]; and

- ii. 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 [35 IAC 218.630(b)].

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected small kettles are subject to the following:

- a. This permit is issued based on negligible emissions of PM from the affected small kettles. For this purpose, emissions shall not exceed 0.1 lb/hr and 0.44 tons/year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). The above limitations were established in Permit 02040088 [T1].

7.2.7 Testing Requirements

Upon request of the Illinois EPA or USEPA, the VOM emissions from an affected small kettle shall be determined in accordance with Reference Method 18, 25 or 25A, specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105. Use of an adaptation of these test methods may not be used unless approved by the Illinois EPA and the USEPA on a case by case basis. The Permittee must submit sufficient documentation for the Illinois EPA and the USEPA to find that the test methods specified above will yield inaccurate results or are otherwise inappropriate and that the proposed adaptation is appropriate [35 IAC 218.105(f)].

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected small kettles to demonstrate compliance with Conditions 5.5.1 and 7.2.3 through 7.2.7, pursuant to Section 39.5(7)(b) of the Act:

- a. For the affected small kettles, the Permittee shall maintain all records necessary to demonstrate

compliance with 35 IAC 218, Subpart AA [35 IAC 218.637(b)].

- b. When a leak is detected (see Condition 7.2.5(b)), 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 [35 IAC 218.628(d)].
- c. The Permittee shall maintain a file that includes:
 - i. The maximum emissions of VOM for production of ink, lb emitted/gallons produced including cleanup, by category or subcategory, with supporting documentation and calculations; and
 - ii. The VOM and HAP content of raw materials used in production of ink.
- d. The Permittee shall maintain records of the following items for the source:
 - i. Ink production by category or subcategory (gallons/month and gallons/year);
 - ii. Total ink production (gallons/month and gallons/year);
 - iii. Usage of solvent and other VOM containing raw materials by type (gallons/month and gallons/year); and
 - iv. Amount and density of cleanup solvent reclaimed if credit is taken for emission reduction (gallons/month and gallons/year).
- e. The Permittee shall maintain the following records for the source related to emissions:
 - i. VOM emissions, tons/month and tons/year, 12-month running total, based in the above data with supporting calculations; and
 - ii. A log identifying each batch of material for which the established emission factor is not believed to fully account for emissions, with explanation and estimate of additional VOM emission in pounds (lb) resulting from such batch due to unique circumstances.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected kettle with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. If there is an exceedance of the requirements of Conditions 7.2.5 or 7.2.6 as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, IL, within 30 days after the exceedance. 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 violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected small kettles without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in raw materials and ink formulations, as long as such changes do not cause a violation of the emission limitations in Conditions 7.2.5 and 7.2.6.

7.2.12 Compliance Procedures

- a. Compliance of the affected small kettles with the emission limitation in Condition 7.2.3(c) is assumed to be achieved by the work-practices inherent in the operation of the affected small kettles, so that no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with Condition 7.2.3(d) is assumed to be achieved by the work-practices inherent in operation of the affected small kettles.
- c. Compliance with Condition 7.2.6(a) shall be based on the recordkeeping requirements in Condition 7.2.9 the emission factors developed from the most recent emission stack test or emission factors developed from USEPA's Emission Inventory Improvement Program (EIIP).

i. VOM Emissions from ink manufacturing:

Emissions (lb) = Ink Production (gal) *
Emission Factor (lb/gal
produced).

ii. VOM Emissions from equipment cleanup
operation:

Emissions (lb) = [Solvent usage for equipment
cleanup (gal) - Solvent
reclaimed (gal)] * Solvent
Density (lb/gal).

In case of the solvent reclaimed, the solvent usage
for equipment cleanup may be determined from the
difference of solvent taken from the inventory for
cleanup and solvent reclaimed.

7.3 Packaging Lines

7.3.1 Description

After the completion of the mixing process, the inks are packaged in bottles directly from the mixing kettle by a liquid fill gun hard piped to the mixing kettle filtering system or hard piped directly from the mixing kettles to one of two dedicated fill lines. Make-up solutions are packed in bottles using a dedicated liquid fill line and water-based products are packed in bottles using a dedicated fill line.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	Packaging Line	None
04	Terco Water Based Product Packaging Line	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected packaging lines" for the purpose of these unit specific conditions, are the packaging lines, as described in Condition 7.3.1 and 7.3.2.
- b. The affected packaging lines are subject to 35 IAC Section 218.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302 and with the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.
- c. The affected packaging lines are subject to 35 IAC 212.321, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected packaging lines not being subject to the requirements of 40 CFR

Part 63, Subpart HHHHH, because the affected packaging lines do not load material containing greater than or equal to 3.0 million gallons per year of HAP with a HAP partial pressure of greater than or equal to 1.5 psia.

- b. This permit is issued based on the affected packaging lines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected packaging lines do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Operational And Production Limits And Work Practices

The affected packaging lines shall not load material containing greater than or equal to 3.0 million gallons per year of HAP with a HAP partial pressure of greater than or equal to 1.5 psia.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected packaging lines are subject to the following:

- a. This permit is issued based on negligible emissions of VOM and PM from the Terco packaging line. For this purpose emission shall not exceed 0.1 lb/hr and 0.44 tons/year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). The above limitations were established in Permit 02040088 [T1].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected packaging lines to demonstrate compliance with Conditions 5.5.1 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain a file that includes:
 - i. The maximum emissions of VOM for packaging of ink, lb emitted/gallons packaged including cleanup, by category or subcategory, with supporting documentation and calculation.
 - ii. The VOM and HAP content of raw materials used in production of ink.
- b. The Permittee shall maintain records of the following items for the source:
 - i. Ink packaged by category or subcategory (gallons/month and gallons/year);
 - ii. Total ink packaged (gallons/month and gallons/year);
 - iii. Usage of solvent and other VOM containing raw materials by type (gallons/month and gallons/year);
- c. The Permittee shall maintain the following records for the source related to emissions:
 - i. VOM emissions, tons/month and tons/year, 12-month running total, based in the above data with supporting calculations;
 - ii. A log identifying each batch of material for which the established emission factor is not believed to fully account for emissions, with explanation and estimate of additional VOM emission in pounds (lb) resulting from such batch due to unique circumstances.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected packaging lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. If there is an exceedance of the requirements of Conditions 7.3.5 or 7.3.6 as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, IL, within 30 days after the exceedance. 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 violation and
efforts to reduce emissions and future occurrences.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance of the affected packaging lines with the emission limitation in Condition 7.3.3(b) is assumed to be achieved by the work-practices inherent in the operation of the affected packaging lines, so that no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with Condition 7.3.3(c) is assumed to be achieved by the work-practices inherent in operation of the affected packaging lines.
- c. Compliance with Condition 7.3.6(a) shall be based on the recordkeeping requirements in Condition 7.3.9 the emission factors developed from the most recent emission stack test or emission factors developed from USEPA's Emission Inventory Improvement Program (EIIP).

i. VOM Emissions from ink packaging:

$$\text{Emissions (lb)} = \text{Ink Packaged (gal)} * \text{Emission Factor (lb/gal packaged)}.$$

ii. VOM Emissions from equipment cleanup operation:

$$\text{Emissions (lb)} = [\text{Solvent usage for equipment cleanup (gal)} - \text{Solvent reclaimed (gal)}] * \text{Solvent Density (lb/gal)}.$$

In case of the solvent reclaimed, the solvent usage for equipment cleanup may be determined from the difference of solvent taken from the inventory for cleanup and solvent reclaimed.

7.4 Storage Tanks

7.4.1 Description

Raw materials are stored in either underground storage tanks or 55-gallon containers. The addition of underground storage tank materials (e.g., methanol and methyl ethyl ketone) is completed via hard piping. The underground storage tanks utilize submerged loading pipes to minimize VOM emissions from filling the tanks.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
T1	Methyl Ethyl Ketone Underground Storage Tank (10,450 Gallons)	None
T2	Methanol Underground Storage Tank (10,450 Gallons)	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected storage tank," for the purpose of these unit-specific conditions, is a storage tank that has a capacity of less than or equal to 40,000 gallons, as identified in Condition 7.4.2.
- b. Each affected storage tank is subject to 35 IAC 218.301, which specifies that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302 and the following exception: if no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 218.301].
- c. Each affected storage tank is subject to the requirements of 35 IAC 218.122(b) because each affected storage tank has a storage capacity greater than 946 liters (250 gallons).
- d. Each affected storage tank is subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because the source has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate and must comply with the work practices in Condition 7.4.5(b) and (c).
- e. Each affected storage tank is subject to 40 CFR 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels, because the construction date of each tank is after the

applicability date of July 23, 1984 and each tank capacity is greater than 40 m³ (10,567 gallon). The Illinois EPA is administering these standards in Illinois on behalf of the USEPA under a delegation agreement. Except for the recordkeeping in Condition 7.4.9 (see also 40 CFR 60.116b), these tanks are exempt from the provisions of 40 CFR 60, Subpart Kb.

7.4.4 Non-Applicability of Regulations of Concern

- a. Each affected storage tank is not subject to 35 IAC 218 Subpart B: Organic Emissions from Storage and Loading Operations (except 35 IAC 218.122(b) and 35 IAC 218.129(f)), because each tank has a capacity of less than 40,000 gallons.
- b. This permit is issued based on the affected storage tanks not being subject to the requirements of 40 CFR Part 63, Subpart HHHHH, because the affected storage tanks have a capacity of less than 20,000 gallons.
- c. This permit is issued based on the affected storage tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected storage tanks do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Control Requirements

- a. Each affected storage tank shall be equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108, or unless such tank is fitted with a recovery system as described in 35 IAC 218.121. If no odor nuisance exists the limitations of this condition shall only apply to the loading of VOL with a vapor pressure of 17.44 kPa (2.5 psia) or greater at 294.3 °K (70 °F) [35 IAC 218.122(b) and (c)].
- b. The Permittee 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 and approved by the USEPA as a SIP revision [35 IAC 218.626(a)].

- c. Stationary VOL storage containers with a capacity greater than 946 L (250 gal) 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 [35 IAC 218.626(b)].

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected storage tanks are subject to the following:

- a. Emissions from the affected storage tanks shall not exceed the following limits:

<u>(Lb/Hr)</u>	VOM Emissions	<u>(Ton/Year)</u>
0.20		0.88

These limits are based on the negligible emission rates from each tank.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 89080007, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected storage tanks to demonstrate compliance with Conditions 5.5.1, 7.4.5, and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following items for each affected storage tank. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.
 - i. Records indicating compliance with 35 IAC 218.122 (e.g., the presence of a submerged loading pipe); and
 - ii. The dimensions of the tank and an analysis of capacity [35 IAC 218.129(f) and 40 CFR 60.116b(b)].
- b. For each tank, the Permittee shall maintain, the identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight.
- c. The Permittee shall maintain records of the following items on an annual basis:
 - i. The throughput of each organic liquid through each tank, gallons; and
 - ii. The VOM emissions attributable to each organic liquid stored at the source, tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology, such as the current version of the TANKS program.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Any loading of organic liquid with a true vapor pressure greater than or equal to 17.44 kPa (2.5 psia) in an affected storage tank without usage of a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
- b. If there is an exceedance of the requirements or emission limits of Condition 7.4.6, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, IL, within 30 days

after the exceedance. The report shall include the emission released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with the requirements in Condition 7.4.5 shall be determined by the recordkeeping and reporting requirements in Condition 7.4.9 and 7.4.10.
- b. Emissions from each affected storage tank shall be determined by the recordkeeping requirements in Condition 7.4.9. Calculations may be based on the current version of the TANKS program or AP-42 emission factors.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after August 22, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Particulate Matter Emissions from Process Emission Units

10.2.1 Section 212.321 - Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972.

- a. Except as further provided in 35 IAC 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 subsection (c) of this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

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

- i. Up to process weight rates of 408 Mg/hr (450 Ton/hr):

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

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 Ton/hr):

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

- c. Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14, 1972

Metric		English	
<u>P</u>	<u>E</u>	<u>P</u>	<u>E</u>
<u>Mg/hr</u>	<u>kg/hr</u>	<u>Ton/hr</u>	<u>lbs/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and
E = Allowable emission rate in kg/hr or lbs/hr.

10.2.2 Section 212.322 - Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972

- a. Except as further provided in 35 IAC Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.

- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

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

- i. For process weight rates up to 27.2 Mg/hr (30 Ton/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	Ton/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rates in excess or 27.2 Mg/hr (30 Ton/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	Ton/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

- c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972

<u>Metric</u>		<u>English</u>	
<u>P</u>	<u>E</u>	<u>P</u>	<u>E</u>
<u>Mg/hr</u>	<u>kg/hr</u>	<u>Ton/hr</u>	<u>lbs/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>Ton/hr</u>	<u>lbs/hr</u>
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and

E = Allowable emission rate in kg/hr or lbs/hr.

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
 - Do not violate any applicable requirement;
 - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature: BY: _____ <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center; width: 45%;"> _____ <small>AUTHORIZED SIGNATURE</small> </div> <div style="text-align: center; width: 45%;"> _____ <small>TITLE OF SIGNATORY</small> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center; width: 45%;"> _____ <small>TYPED OR PRINTED NAME OF SIGNATORY</small> </div> <div style="text-align: center; width: 45%;"> _____ / _____ / _____ <small>DATE</small> </div> </div>

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

10.6 Attachment 6 - Changes in VOM Emissions

VOM emissions changes listed in Permit 02040088 (granted on June 21, 2002 for construction of fifteen new mixing tanks or kettles ranging in size from 1,000 to 5 gallons and a new Terco water based product packaging line)

<u>Equipment</u>	<u>Historic Emissions (Ton/Yr)</u>	<u>Estimated Emissions (Ton/Yr)</u>	<u>Increases** (Ton/Yr)</u>
Affected Kettles	21.84	37.2*	15.36

* Limitation for the source, including the new affected kettles and existing emission units combined shall not exceed 37.2 tons/year. Existing emission units were limited to 24.8 tons/year pursuant to FESOP 89080007.

** There was no emission increase during the contemporaneous period from 1998 to 2002.