

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Carbit Paint Company
Attn: David Westerman
927 West Blackhawk Street
Chicago, Illinois 60622

Application No.: 72100266

I.D. No.: 031600BGE

Applicant's Designation:

Date Received: December 20, 2002

Subject: Paint Manufacturing

Date Issued:

Expiration Date:

Location: 927 West Blackhawk Street, Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of twelve paint dispersion mills and eleven paint mixers controlled by dust collectors, a boiler, product test spray booth, solvent recovery unit and two solvent storage tanks pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons per year of volatile organic material (VOM)). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. This permit is issued based upon the paint manufacturing operations not being subject to the requirements of 35 Ill. Adm. Code Part 218, Subpart AA: Paint and Ink Manufacturing per applicability criteria of Section 218.620(b). This is consequence of the potential emissions of VOM being limited to less than 25 tons/year through the federally enforceable conditions of this permit and solvent based paints production rate being less than 500,000 gallons per year.
3. Raw materials usage and plant-wide VOM emissions from the paint manufacturing operations shall not exceed the following limits:

VOM Usage		Emission Factor	VOM Emissions	
(Ton/Mo)	(Ton/Yr)	(Wt. %)	(Ton/Mo)	(Ton/Yr)
80	600	3.4	2.7	20.4

These limits are based on the maximum production rate and standard emission factor given by Emission Inventory Improvement System (EIIP), Volume II, Chapter 8: Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 4a. This permit is issued based upon the test paint booth operations being exempt from control requirements of 35 Ill. Adm. Code 218.204 due to compliance with exemption level of 218.208(a): daily VOM emission from coating operations never exceeding 15 lbs/day before the application of capture systems and control devices.
- b. This permit is issued based on negligible emissions of volatile organic material from the spray booth. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
- 5. Emissions of volatile organic materials from the solvent recovery unit shall not exceed 0.2 lb/hr and 0.6 ton/yr. These limits are based on the maximum process rate (4.4 lb/hr and 12.0 ton/yr) and a 5% evaporation loss. Compliance with the annual limits shall be determined from a running total of 12 months of data.
- 6. This permit is issued based on negligible emissions of volatile organic material from two solvent storage tanks. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
- 7. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 8. Operation and emissions of the boiler shall not exceed the following limits:

Natural Gas Usage: 5 mmscf/mo, 20 mmscf/yr

<u>Pollutant</u>	<u>Emission Factor</u> (lb/mmscf)	<u>Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
Nitrogen Oxides (NO _x)	100	0.3	1.0
Carbon Monoxide (CO)	84	0.2	0.8
Volatile Organic Materials (VOM)	5.5	0.01	0.05

These limits are based on the maximum operating rate and standard emission factors given by AP-42. Compliance with annual limits shall be determined from a running total of 12 months of data.

9. Operations and particulate matter emission from pigment handling and mixing shall not exceed the following limits:

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Pigment Usage		Emission Factor	Control Efficiency	PM Emission	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Wt.%)</u>	<u>(%)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
100	800	1	90	0.1	0.8

These limits are based on the maximum production rate and standard emission factors for pigment handling given by AP-42. Compliance with annual limits shall be determined from a running total of 12 months of data.

10. The Permittee shall maintain monthly records of the following items:
 - a. Names and amount of solvents used (ton/mo; ton/yr);
 - b. VOM content in the solvents (wt. %);
 - c. VOM emission calculations (ton/mo; ton/yr).
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
12. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. 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.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
 Division of Air Pollution Control
 Compliance Section (#40)

P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

14. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:

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a. Solvent usage (tons/year).

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:VJB:

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the paint manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is usage of 600 tons of solvents per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of volatile organic material at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less paint is produced and control measures are more effective than required in this permit.

1. Raw materials usage and plant-wide VOM emissions from the paint manufacturing operations shall not exceed the following limits:

VOM Usage		Emission Factor (Wt. %)	VOM Emissions	
(Ton/Mo)	(Ton/Yr)		(Ton/Mo)	(Ton/Yr)
80	600	3.4	2.7	20.4

2. This permit is issued based on negligible emissions of volatile organic material from the spray booth. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
3. Emissions of volatile organic materials from the solvent recovery unit shall not exceed 0.2 lb/hr and 0.6 ton/yr. These limits are based on the maximum process rate (4.4 lb/hr, 12.0 ton/yr) and a 5% evaporation loss. Compliance with the annual limits shall be determined from a running total of 12 months of data.
4. This permit is issued based on negligible emissions of volatile organic material from two solvent storage tanks. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
6. Operation and emissions of the boiler shall not exceed the following limits:

Natural Gas Usage: 5 mmscf/mo, 20 mmscf/yr

<u>Pollutant</u>	Emission Factor (lb/mm scf)	Emissions	
		(Ton/Mo)	(Ton/Yr)
Nitrogen Oxides (NO _x)	100	0.3	1.0
Carbon Monoxide (CO)	84	0.2	0.8
Volatile Organic Materials (VOM)	5.5	0.01	0.05

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7. Operations and particulate matter emission from pigment handling and mixing shall not exceed the following limits:

<u>Pigment Usage</u>		<u>Emission Factor</u> (Wt.%)	<u>Control Efficiency</u> (%)	<u>PM Emission</u>	
(Ton/Mo)	(Ton/Yr)			(Ton/Mo)	(Ton/Yr)
100	800	1	90	0.1	0.8

VJB: