

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
RENEWAL

PERMITTEE

United Gilsonite Laboratories  
Attn: Richard Barako  
1396 Jefferson Avenue  
Scranton, Pennsylvania 18501

Application No.: 85100036                      I.D. No.: 137020ACZ  
Applicant's Designation: PAINT MANUFACT      Date Received: January 18, 2006  
Subject: Paint Manufacturing  
Date Issued:                                      Expiration Date:  
Location: 550 Capitol Way, Jacksonville, Morgan County 62651

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of paint/stain manufacturing equipment which consists of ten mixing tanks controlled by a dust collector and ten 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:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for any single HAP, and 25 tons/year for combination of HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing, 40 CFR 63 Subpart HHHHH. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- 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.

- 2a. 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 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
- c. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
- 3a. Pursuant to 35 Ill. Adm. Code 215.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hour) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading facility having throughput of greater than 151 cubic meters per day (40,000 gallons/day) into any railroad tank car, tank truck or trailer unless such loading facility is equipped with submerged loading pipes, submerged fill, or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201.
- b. Pursuant to 35 Ill. Adm. Code 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gallons), unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 215.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 215.121(b)(2).
- c. Pursuant to 35 Ill. Adm. Code 215.122(c), exception: if no odor nuisance exists the limitations of 35 Ill. Adm. Code 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3 K (70oF).
- d. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception:

If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.

4. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 5a. The dust collector shall be in operation at all times when the associated emission units are in operation and emitting air contaminants.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the dust collector such that the dust collector is kept in proper working condition and not cause a violation the Environmental Protection Act or regulations promulgated therein.
- 6a. Operation of the paint/stain manufacturing facility shall not exceed the following limits:
  - i. Paint/Stain/Paste Production: 350,000 gallons/month, 3,500,000 gallons/year
  - ii. Dry Products Production Rate: 100 ton/month, 1,000 ton/year
  - iii. Overall Solvent Usage\*: 121,500 gallons/month, 1,215,000 gallons/year  
HAP Solvent Usage  
Glycol Ethers: 11,100 gallons/month, 111,000 gallons/year  
- Glycol Monomethyl Ether  
- Dipropylene Glycol Butyl Ether  
- Propylene Glycol Monomethyl Ether  
Aromatic 100: 2,325 gallons/month, 23,250 gallons/year  
- 1, 2, 4 - Trimethylbenzene  
- Xylene  
- Cumene  
- Ethylbenzene  
  
\* Overall solvent usage includes clean up solvents and solvents used as raw material.
  - iv. Solid Particulate Usage: 1,170 ton/month, 11,700 ton/year
  - v. Storage Tank Throughput

All tanks storing solvent and non-solvent materials with vapor pressures less than 1.0 psia shall not exceed average monthly throughputs of 65,000 gallons/month.

- b. Emissions of volatile organic material (VOM) and particulate matter (PM) and operation of the facility equipment shall not exceed the following limits:

<u>Overall Solvent Usage</u> <u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Emission Factor</u> <u>(Lb/Gal)</u>	<u>VOM Emissions</u>	
			<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
121,500	1,215,000	0.15	9.2	91.5
Paint/Stain				
<u>Solid Particulate Usage</u> <u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>Emission Factor</u> <u>(Wt. %)</u>	<u>PM Emissions</u>	
			<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
1,170	11,700	0.0005	0.60	6.0

These limits define the potential emissions of VOM and PM and are based on maximum material usages, 90% control efficiency of the dust collector, solvent density of 10 lbs/gallon, a loss of 1.5% of solvents, and a loss of 0.5% of particulates.

- c. Emissions of HAP shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>Density</u> <u>(Lb/Gal)</u>	<u>Emission</u> <u>Factor</u> <u>(Wt. %)</u>	<u>HAP Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>			<u>(T/Mo)</u>	<u>(T/Yr)</u>
Glycol Ethers	11,100	111,000	8.56	1.5	0.72	7.2
Aromatics 100	2,325	23,250	7.26	1.5	0.13	1.3
				Total	0.85	8.5

These limits define the potential emissions of HAP emissions and are based on maximum material usages and AP-42 6.4.1 "Paint Manufacturing".

- d. Emissions from all storage tanks shall not exceed 0.1 tons/month and 1.0 tons/year of VOM.
7. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA.
8. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

- 9a. Upon request by the Illinois EPA and Pursuant to 35 Ill. Adm. Code 212.107, 212.109, and 212.110, testing for particulate matter emissions shall be performed as follows:
- i. For both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, incorporated by reference in 35 Ill. Adm. Code 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301, pursuant to 35 Ill. Adm. Code 212.107.
  - ii. Except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 Ill. Adm. Code 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged, pursuant to 35 Ill. Adm. Code 212.109.
  - iii. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA, pursuant to 35 Ill. Adm. Code 212.110(c).
  - iv. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- b. Testing required by Condition 9(a) shall be performed by a qualified independent testing service.
- 10a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants

regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- c. The Permittee shall maintain monthly records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Records addressing use of good operating practices for the dust collector:
    - A. Records for periodic inspection of the dust collector with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. Identification and amount of each HAP solvent used (gallon/month and gallon/year);
  - iii. Amount of overall solvents used (gallon/month and gallon/year);

- iv. Amount of solid particulates used (tons/month and tons/year);
  - v. Amount of paint, stain, paste, and dry products produced (gallon/month and gallon/year or tons/month and tons/year); and
  - vi. Monthly and annual VOM, individual and total HAP, and PM emissions from the source with supporting calculations (tons/month and tons/year).
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) 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.
- 12a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- b. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

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

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

Page 8

Please note that this permit has been revised to remove ethylene glycol for the HAP limits; ethylene glycol was removed from list of Hazardous Air Pollutants (HAP) contained in section 112(b)(1) of the Clean Air Act (CAA) in November, 2004.

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

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

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

ECB:GMK:jws

cc: Region 2

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the paint manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 25 tons/year for volatile organic material (VOM), 10 tons/year for any single HAP and 25 tons/year for combination of HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Material used</u>	E M I S S I O N S (Tons/Year)			
	<u>PM</u>	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAP</u>
Solvent used		91.5		
Solid particulate used	6.0			
Glycol ethers			7.2	7.2
Aromatics 100			1.3	<u>1.3</u>
Total	<u>6.0</u>	<u>91.5</u>	9.0	<u>22.5</u>

GMK:jws