

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - "REVISED"

PERMITTEE

Engineered Polymer Solutions, Inc.
D/B/A Valspar Coatings
Attn: Allen M. Stegman
701 South Shiloh Road
Garland, Texas 75042-7812

Application No.: 72100330
Applicant's Designation:
Subject: Paint and Resin Manufacturing
Date Issued: December 20, 1999
Location: 901 North Greenwood, Kankakee

I.D. No.: 091055ABM
Date Received: November 3, 1999
Expiration Date: March 12, 2002

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of seven resin reactors with scrubbers and condensers, ancillary equipment for resin manufacturing, paint, ink manufacturing process including mixers, blenders, and mills, storage tanks, solvent recovery, recycle operations, wastewater pretreatment, a hot oil furnace and gas-fired boilers 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., 100 ton/yr of volatile organic material (VOM), 10 ton/yr of a single hazardous air pollutant (HAP) and 25 ton/yr of all HAPs combined). 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.
- 2a.
 - i. Organic solvent used in paint and resin production shall not exceed 20,000 ton/year. Emissions of VOM shall not exceed 95 ton/year.
 - ii. Although not subject to 35 Ill. Adm. Code 218 Subpart AA due to location, the Permittee has agreed to voluntarily comply with the equipment and operational requirements of § 218 Subpart AA.
 - iii. For the K7 kettle the following conditions also apply:

<u>Product Group</u> <u>(Kettle) or Tank</u>	<u>Condenser</u> <u>Temp (EF)</u>	<u>Sparge</u> <u>Rate^a, ft³/Hr</u>	<u>Total Blanket and</u> <u>Sparge Gas, ft³/yr^b</u>	<u>VOM Emissions</u> <u>(Lb/Hr)(T/Yr)</u>	
K7-Alkyd Reins	70 ^d	300	600,000	2.8	2.8
K7 Polyester Resins	100 ^d	600	2,800,000	0.2 ^c	0.5 ^c
Mix Tank	70 ^d	60	504,000	0.1	0.6

- a. Daily average of hours when actively sparging.
 - b. If meters do not record total usage, then total usage may be calculated by a standard amount per batch and number of batches.
 - c. Emissions are lower for polyester resins than for alkyd resins despite higher sparge rate as the solvent has a lower vapor pressure (0.02 psia vs. 1.0 for alkyd). Emissions are not additive as annual figures allow for 60% of total time to be used.
 - d. Condenser temperatures are based on yearly averages.
- iv. The other six reactors shall be vented through the fume scrubber.
 - v. The fume scrubber and condensers shall be operated to keep average solvent loss to 0.4% of usage.
- b. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 3. 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 Agency. 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.
- 4a. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in Condition 2, 3 and 8.
 - i. Quantity of each solvent used in paint and resin production (tons/mo and tons/yr);
 - ii. K7 sparge rate (ft³/hr);
 - iii. Individual HAP usage (tons/mo and tons/yr);
 - vi. Condenser cooling water inlet temperature (EF);
 - v. Natural gas usage (ft³ or therms/mo); and
 - vi. VOM and HAP emissions with supporting calculations (tons/mo and tons/yr).
- b. 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.

5. 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.

The following special conditions are not federally enforceable:

6. All reports, notifications, etc., required by this permit shall be sent to:

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

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

- 7a. Emissions of particulate matter (PM) shall not exceed 1.0 ton/year. The dust collector shall be operated to reduce PM emissions by 99%.
- b. Usage of natural gas in the furnace and boiler combined shall not exceed 300,000,000 ft³/yr. Emissions of nitrogen oxides shall not exceed 21 ton/year.
8. Annual emissions of regulated air pollutants shall not exceed 117 tons, which shall be the permitted emissions for this site.
9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
 - a. Solvent used in paint and resin production (tons/mo and tons/yr); and
 - b. VOM and HAP emissions (tons/mo and tons/yr).

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

10. The following Standard Conditions are not federally enforceable: Standard Conditions 3(a), 8, 9, 10, and 11.

It should be noted that this permit has been revised to change solvent usage without emission limitation increase.

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These revisions do not relax testing, monitoring, recordkeeping, or reporting requirements contained in the federally enforceable conditions of this permit. This permit continues to assure that this source would not be a major source for purposes of CAAPP.

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

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

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cc: IEPA, FOS Region 1
IEPA, Compliance Section
USEPA

Attachment A - Emission Summary - Revised October 16, 1997

This attachment provides a summary of the maximum emissions from paint and resin manufacturing operations operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of VOM and 25 tons per year 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.

1. VOM emissions from paint and resin production:

<u>Solvent Usage</u>		<u>VOM Emissions</u>	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
1,750	20,000	8.0	95.0

This table represents the plant's potential emissions of VOM and is based on the maximum individual solvent usage and the maximum loss rate for each solvent.

2. Particulate matter emissions from paint and resin production:

<u>PM Emissions</u>	
<u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
0.2	1.0

3. NO_x emission from fuel combustion equipment:

<u>Natural Gas Usage</u>	<u>Emission Factor</u>	<u>NO_x Emissions</u>
<u>(Million ft³/Yr)</u>	<u>(Lb NO_x/mmBtu)</u>	<u>(Tons/Yr)</u>
300	0.14	21.0

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