

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

C. A. Acquisition LLC
d/b/a Chicago Aerosol LLC
Attn: Mr. Wayne Arndt
1300 North Street
Coal City, Illinois 60416

Application No.: 84090001
Applicant's Designation: BLEND 1
Subject: Aerosol Products
Date Issued: July 20, 2005
Location: 1300 North Street, Coal City

I.D. No.: 063020AAR
Date Received: September 29, 2003
Expiration Date: July 20, 2010

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a 50,000-gallon ethyl alcohol floating roof storage tank with double seals (#28), four pressurized 8,000-gallon propellant storage tanks (#7, #9, #11, #13), two 6,000-gallon isopropanol storage tanks (#10, #29), two pressurized 5,000-gallon mixed propellant storage tanks (#5, #8), seven pressurized 30,000-gallon storage tanks for propane, butane, 1,1-difluoroethane, and LP gas (#15, #16, #17, #18, #19, #20, #26), four 12,000-gallon ethanol storage tanks (#1, #2, #3, #30), two pressurized 6,220-gallon dimethyl ether propellant storage tanks (#24, #25), two 10,000-gallon alcohol storage tanks (#4, #14), one 6,000-gallon mineral spirit storage tank (#6), one 10,000-gallon mineral spirit storage tank (#14A), one pressurized 12,000-gallon storage tank (#21) containing 50% butane and 50% propane, one pressurized 9,200-gallon 1,1-difluoroethane storage tank (#22), one pressurized 7,650-gallon 1,1-difluoroethane storage tank (#23), two 8,000-gallon surfactant (Bio-Terge/Sulfochem) storage tanks (#1, #2), two 12,000-gallon soapy rinse water storage tanks (#1A, #2A), one 2,000-gallon surfactant (Sulfochem) storage tank (#12), non-propellant formulating process consisting of fifteen mixing and holding tanks, five liquid production lines, three aerosol can filling processes consisting of two undercup and a through-the-valve filling lines, two unloading racks, and two boilers as described in 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 tpy of volatile organic material (VOM), 25 tpy of combined hazardous air pollutants (HAPs) and 10 tpy of each single HAP). 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. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(g) of the Clean Air Act.

- 3a. The floating roof storage tank (#28) is subject to New Source Performance Standards (NSPS), 40 CFR 60 Subparts A and Kb. The Illinois EPA is administering these standards in Illinois on behalf of the USEPA under a delegation agreement.

- b. The floating roof storage tank (#28) shall comply with the equipment standards contained in the NSPS, 40 CFR 60.112b.

- c. At all times the Permittee shall, to the extent practicable, maintain and operate these tanks, in a manner consistent with good air pollution practice for minimizing emissions, pursuant to the New Source Performance Standard.

- 4a. The Permittee shall fulfill the Testing and Procedures requirements of 60.113b. Notification should be sent to:

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

- b. The Permittee shall fulfill applicable notification and recordkeeping requirements of the NSPS, 40 CFR 60.115b.

- c. The Permittee shall maintain records of the throughputs and materials stored to allow the Illinois EPA to review compliance with the limits in this permit.

- d. The Permittee shall notify the Illinois EPA of any change in the type of material stored that are different than those identified in the application.

5. The Permittee shall fulfill the monitoring of operations requirements of the New Source Performance Standards, 40 CFR 60.116b(a) and (b) for the floating roof storage tank (#28). That is, records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel, shall be maintained and readily accessible for the life of the source.

6. Emissions and operation of equipment shall not exceed the following:

<u>Equipment/Process</u>	<u>Throughput</u>		<u>Emission Factor</u>	<u>VOM Emissions</u>	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>		<u>(T/Mo)</u>	<u>(T/Yr)</u>
All Storage Tanks		6.6 Million Gallons Ethanol/Yr		0.35	3.5
Non-Propellant Formulations	457	4,563	1.2%	5.5	54.8

(Continued)

<u>Equipment/Process</u>	<u>Throughput</u>		<u>Emission Factor</u>	<u>VOM Emissions</u>	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>		<u>(T/Mo)</u>	<u>(T/Yr)</u>
2 Undercup Filling Lines	(Units/Mo) 7,344,000	(Units/Yr) 73,440,000	(On-Site Test Data) 2.5 cc/Unit	3.0	29.8
Through Valve Filling Line	1,800,000	18,000,000	(Manufacturer's Test Data) 0.16 cc/Unit	0.2	1.75
Clean-Up				0.5	<u>5.2</u>
				Total:	95.05

These limits are based on the use of Tanks 4.0 for the storage tanks, standard AP-42 emission factors (Section 6.4, Paint Manufacturing), and manufacturer's test data on similar equipment for the through-the-valve filling line. Cleanup Emissions = Solvent Used Minus Solvent Reclaimed and Shipped Off-Site. Compliance with annual limits shall be determined from a running total of 12 months of data.

7. This Permit is issued based on negligible emissions of volatile organic material from a change in contents for tank number 8, 14, 2A, and 1A. For this purpose, emissions from all four tanks together shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
8. This permit is issued based upon minimal hourly emission rate and negligible annual emissions (less than 0.1 ton/year) of organic material from any of the 30,000-gallon pressurized propellant or LP storage tanks (Tank Farm numbers 16, 18, 20 and 26, and 15, 17, 19, and 21, respectively). This limit also includes all pump and piping emissions.
9. Emissions and operation of the 2 boilers shall not exceed the following:

<u>Natural Gas Usage</u>		<u>NO_x</u>		<u>CO</u>		<u>VOM</u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
5	50	0.3	2.5	0.2	2.1	0.01	0.1

These limits are based on standard AP-42 emission factors. 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:
 - a. Natural gas usage (mmscf/mo and mmscf/yr) in 2 boilers.
 - b. Non-propellant throughput (tons/month and tons/year).
 - c. Ethanol throughput (million gallon/mo and million gallon/yr).
 - d. Units/month and units/year filled by the 2 undercup filling lines.

- e. Units/month and units/year filled by the through the valve line.
 - f. All materials used for clean-up (tons/month and tons/year).
 - g. Clean-up solvent reclaimed and shipped off-site (tons/month and tons/year).
 - h. VOM and HAP emissions 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 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
2009 Mall Street
Collinsville, Illinois 62234

It should be noted that the Cleaver Brooks 2.7 mmBtu/hr boiler, and Cleaver Brooks 6 mmBtu/hr boiler, four pressurized 8,000-gallon tanks and two 5,000-gallon tanks (Tank Farm numbers: #7, #9, #11, #13, and #5 and #8, respectively), three 10,000-gallon tanks and three 6,000-gallon tanks (Tank Farm numbers: #4, #14, #14A and #6, #10 and #29, respectively), one 2,000-gallon tank, one 7,650-gallon tank and one 9,200-gallon tank containing sodium hydroxide and surfactant solutions (Tank Farm numbers: #12, #22 and #23, respectively), two 12,000-gallon tanks containing soapy rinse water (Tank Farm numbers: #1A and #2A), one 12,000-gallon pressurized tank containing 50% propane

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and 50% butane (Tank Farm number: #21), two 8,000-gallon tanks containing surfactant material in the Batch Area and Warehouse (Tank numbers #1 and #2), and two non-aerosol, liquid filling lines are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(c), (n) (1), (n) (2) and (ff), respectively.

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

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

DES:RBS:jar

cc: Region 3
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the aerosol products 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 handling 4,563 tpy of raw material, filling 36,720,000 units and using 912,500 gallons of clean-up solvent per year. The resulting maximum emissions are below the levels, (e.g., 100 tpy of VOM, 25 of combined HAPs and 10 tpy of each single HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Equipment/Process</u>	<u>VOM (Tons/Year)</u>	<u>HAPs (Tons/Year)</u>	<u>NO_x (Tons/Year)</u>	<u>Single HAP (Tons/Year)</u>	<u>CO (Tons/Year)</u>
3 Boilers	0.1		2.5		2.1
All Storage Tanks	3.6				
Non-Propellant Formulations	54.8				
2 Undercup Filling Lines	29.8				
Through Valve Filling Line	1.75				
Clean-Up	<u>5.2</u>				
Totals:	95.3	< 25	2.5	< 10	2.1

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