

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE -- RENEWAL

PERMITTEE

EMCO Chemical Distributors, Inc.
Attn: Carl Raycroft
2100 Commonwealth Avenue
North Chicago, Illinois 60064

Application No.: 76100054

I.D. No.: 097125ABI

Applicant's Designation:

Date Received: September 2, 2008

Subject: Chemical Packaging Plant

Date Issued: December 19, 2013

Expiration Date: December 19, 2023

Location: 2100 Commonwealth Avenue, North Chicago, Lake County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of tank farm (82 storage tanks \leq 10,000 gallons, each), direct filling operation, twenty (20) blending tanks and container filling operations, truck filling operation, truck cleaning operation, wastewater treatment plant, boilers/space heaters and inorganic chemicals filling operations controlled by acid/caustic scrubber 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., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP), and 25 tons/year for any combination of such 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. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. 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 permit(s) for this location.
- 2a. This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing Area Sources, 40 CFR 63 Subparts A and VVVVVV. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

- b. Pursuant to 40 CFR 63.11494(a), except as specified in 40 CFR 63.11494(c), you are subject to 40 CFR 63 Subpart VVVVVV if you own or operate a chemical manufacturing process unit (CMPU) that meets the conditions specified in 40 CFR 63.11494(a)(1) through (3).
 - i. The CMPU uses as feedstocks, generates as byproducts, or produces as products any of the hazardous air pollutants (HAP) listed in Table 1 to 40 CFR Subpart VVVVVV (Table 1 HAP).
 - ii. The CMPU is located at an area source of HAP emissions.
 - iii. Table 1 HAP are present in feedstocks, or Table 1 HAP are generated or produced in the CMPU and are present in process fluid, at concentrations greater than 0.1 percent for carcinogens, as defined by the Occupational Safety and Health Administration at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. To determine the Table 1 HAP content of feedstocks, you may rely on formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet (MSDS) for the material. If the concentration in an MSDS is presented as a range, use the upper bound of the range.
- c. Pursuant to 40 CFR 63.11494(b), a CMPU includes all process vessels, equipment, and activities necessary to operate a chemical manufacturing process that produces a material or a family of materials described by North American Industry Classification System (NAICS) code 325. A CMPU consists of one or more unit operations and any associated recovery devices. A CMPU also includes each storage tank, transfer operation, surge control vessel, and bottoms receiver associated with the production of such NAICS code 325 materials.
- d. Pursuant to 40 CFR 63.11494(f), if you own or operate an existing affected source, you must achieve compliance with the applicable provisions in 40 CFR 63 Subpart VVVVVV no later than October 29, 2012.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- 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 35 Ill. Adm. Code 212.321(c).
- 4. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 5a. Pursuant to 35 Ill. Adm. Code 218.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gallons/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes 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, and further processed consistent with 35 Ill. Adm. Code 218.108.
- b. Pursuant to 35 Ill. Adm. Code 218.122(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 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe 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 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
- c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.
- 6. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Chemical Preparations Industry, 40 CFR 63 Subpart BBBBBBBB because the chemical preparations facility does not have any chemical preparations operation in target HAP service (as defined in 40 CFR 63.11588, "What definitions apply to this subpart?").
- 7. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average

or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

- 8a. This permit is issued based on the storage tanks at this source not being subject to 35 Ill. Adm. Code 218.120, Control Requirements for Storage Containers for VOL. Pursuant to 35 Ill. Adm. Code 218.119(f), the limitations of 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL) shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gallons) capacity or greater, except to vessels with storage capacity less than 40,000 gallons must comply with 35 Ill. Adm. Code 218.129(f).
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 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 (70°F).
- c. Pursuant to 35 Ill. Adm. Code 218.500(c), the following single unit operations and batch process trains are subject to 35 Ill. Adm. Code 218 Subpart V but are considered to be de minimis and are, therefore, exempt from the control requirements of 35 Ill. Adm. Code 218.501. However, the recordkeeping and reporting requirements in 35 Ill. Adm. Code 218.505 shall apply to such de minimis single unit operations and batch process trains:
- i. Within a batch operation, any single unit operation with uncontrolled total annual mass emissions of less than or equal to 500 lbs/year of VOM. Such single unit operations are also excluded from the calculation of the total annual mass emissions for a batch process train. If the uncontrolled total annual mass emissions from such exempt single unit operation exceed 500 lbs/year of VOM in any subsequent year, the source shall calculate applicability in accordance with 35 Ill. Adm. Code 218.500(d) for both the individual single unit operation and the batch process train containing the single unit operation; and
- ii. Any batch process train containing process vents that have, in the aggregate, uncontrolled total annual mass emissions, as determined in accordance with 35 Ill. Adm. Code 218.502(a), of less than 30,000 lbs/year of VOM for all products manufactured in such batch process train.
- d. This permit is issued based on the source not being subject to the control requirements for 35 Ill. Adm. Code 218 Subpart RR (Miscellaneous Organic Chemical Manufacturing Processes). This is a result of the federally enforceable production and operating

limitations, which restrict the potential to emit for VOM to less than 25 tons per year.

9. Pursuant to 40 CFR 63.11501(a), you must meet the requirements of the General Provisions in 40 CFR Part 63, Subpart A, as shown in Table 9 to 40 CFR 63 Subpart VVVVVV (see Attachment B). The General Provisions in other parts do not apply except when a requirement in an overlapping standard, which you determined is at least as stringent as 40 CFR 63 Subpart VVVVVV and with which you have opted to comply, requires compliance with general provisions in another part.
- 10a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property 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 required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;

- vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 11a. 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.
- b. The boilers and space heaters shall only be operated with natural gas as the fuel. The use of any other fuel in the boilers or space heaters requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 12a. Emissions and operation of the organic chemical processing operations shall not exceed the following limits:

<u>Operation</u>	<u>Throughput</u>		<u>VOM Emissions</u>	
	<u>(10³ Gal/Mo)</u>	<u>(10³ Gal/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Organic Liquid Storage Tanks	3,200	31,200	0.3	3.0
Truck and Drum Filling	2,200	21,800	0.8	8.2
Blending Tank Filling & Mixing	1,000	9,400	1.0	6.3
			Total:	17.5

These limits are based on the maximum equipment operation and VOM emissions calculated using equations given by standard emission formulas and factors (Organic liquids storage tank operations: Section 7.1, AP-42 5th edition, Volume I, November 2006 and utilized in the TANKS Program Version 4.09D; Truck and drum filling operations: Section 5.2, AP-42 5th edition, Volume I, July 2008; Blending tank filling and mixing operations: EIIP Volume 2: Chapter 16, Methods for Estimating Air Emissions from Chemical Manufacturing Facilities, August 2007).

- b. Emissions and operation of the tank truck cleaning operations shall not exceed the following limits:

<u>Trucks Cleaned</u>		<u>Emission Factor</u> <u>(Lbs/Truck)</u>	<u>VOM Emissions</u>	
<u>(Trucks/Mo)</u>	<u>(Trucks/Yr)</u>		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
460	4,550	0.7	0.2	1.6

These limits are based on the maximum equipment operation and VOM emissions calculated using standard emission factors (Table 4.8-2, AP-42, 5th edition, Volume I, February 1980).

- c. This permit is issued based on negligible emission of volatile organic materials from wastewater treatment plant. For this purpose emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- d. Fugitive VOM emissions from the facility operations shall not exceed 0.3 ton/month and 2.7 tons/year. It shall be calculated using USEPA SOCMF factors (EPA-453/R-95-017).
- e. Operation and emissions of the boilers and heaters at this source (combined) shall not exceed the following limits:
 - i. Natural Gas Usage: 9.0 mmscf/month, 72 mmscf/year
 - ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor (lbs/mmscf)</u>	<u>Emissions</u>	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84	0.38	3.02
Nitrogen Oxides (NO _x)	100	0.45	3.60
Particulate Matter (PM)	7.6	0.03	0.27
Sulfur Dioxide (SO ₂)	0.6	0.01	0.02
Volatile Organic Materials (VOM)	5.5	0.02	0.20

These limits are based on the maximum fuel use and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- f. This permit is issued based on negligible emission of particulate matter from inorganic chemicals filling operations. For this purpose emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- g. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 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 project not triggering the requirements of Section 112(g) of the Clean Air Act.
- h. 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).

13. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
14. Pursuant to 35 Ill. Adm. Code 212.110(c), 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.
15. 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.

16. 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.
- 17a. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- b. Pursuant to 35 Ill. Adm. Code 218.503(d), the owner or operator of a batch operation that is exempt from the control requirements of 35 Ill. Adm. Code 218.501 shall demonstrate, upon the Illinois EPA's request, the absence of oversized gas moving equipment in any manifold. Gas moving equipment shall be considered oversized if it exceeds the maximum requirements of the exhaust flow rate by more than 30 percent.
- c. Pursuant to 35 Ill. Adm. Code 218.505(a), every owner or operator of a de minimis single unit operation or batch process train exempt under 35 Ill. Adm. Code 218.500(c)(1) or (c)(2) shall keep records of the uncontrolled total annual mass emissions for any de minimis single unit operation or batch process train, as applicable, and documentation verifying these values or measurements. The documentation shall include the engineering calculations, any measurements made in accordance with 35 Ill. Adm. Code 218.503, and the potential or

permitted number of batch cycles per year, or, in the alternative, total production as represented in the source's operating permit.

- d. Pursuant to 35 Ill. Adm. Code 218.505(b), every owner or operator of a single unit operation exempt under 35 Ill. Adm. Code 218.500(b)(3) or (d) shall keep the following records:
 - i. The uncontrolled total annual mass emissions and documentation verifying these values or measurements. The documentation shall include any engineering calculations, any measurements made in accordance with 35 Ill. Adm. Code 218.503, and the potential or permitted number of batch cycles per year, or, in the alternative, total production as represented in the source's operating permit.
 - ii. The average flow rate in scfm and documentation verifying this value.
 - e. Pursuant to 35 Ill. Adm. Code 218.505(d), every owner or operator of a single unit operation claiming a vent stream concentration exemption level, as set forth in 35 Ill. Adm. Code 218.500(d)(1), shall maintain records to indicate the vent stream concentration is less than or equal to 500 ppmv.
 - f. Pursuant to 35 Ill. Adm. Code 218.505(h), every owner or operator of a batch operation required to keep records under 35 Ill. Adm. Code 218.505 shall maintain such records at the source for a minimum period of three years and shall make all such records available to the Illinois EPA upon request.
- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Names and throughput of all materials in storage tanks (gallons/month and gallons/year);
 - ii. Names and throughput of all materials in truck and drum filling operations (gallons/month and gallons/year);
 - iii. Name of the product, names and throughput of all materials in each batch of blending and mixing operations (gallons/month and gallons/year);
 - iv. Natural gas usage (mmscf/month and mmscf/year); and
 - v. Monthly and annual emissions of NO_x, CO, PM, VOM and HAP from the source with supporting calculations (tons/month and tons/year). VOM and HAP emissions from blending and mixing operation shall be calculated on per batch bases. For the small batches less than 100 gallons and for batches of products run no more than 12 times per year VOM and HAP emissions may be calculated using emission factors developed for the similar in composition regular batches.

- b. 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 storage device) 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.
- 19a. Pursuant to 40 CFR 63.11501(b), Your Notification of Compliance Status (NOCS) required by 40 CFR 63.9(h) must include the following additional information as applicable:
- i. This certification of compliance, signed by a responsible official:
 - A. "This facility complies with the management practices in 40 CFR 63.11495."
 - B. "This facility complies with the requirements in 40 CFR 63.11496 for HAP emissions from process vents."
 - C. "This facility complies with the requirements in 40 CFR 63.11496 and 40 CFR 63.11497 for surge control vessels, bottoms receivers, and storage tanks."
 - D. "This facility complies with the requirements in 40 CFR 63.11498 to treat wastewater streams."
 - E. "This facility complies with the requirements in 40 CFR 63.11499 for heat exchange systems."
 - ii. If you comply with the alternative standard as specified in Table 2 to 40 CFR Subpart VVVVVV or Table 3 to 40 CFR Subpart VVVVVV, include the information specified in 40 CFR 63.1258(b)(5), as applicable.
 - iii. If you establish an operating limit for a parameter that will not be monitored continuously in accordance with 40 CFR 63.11496(g)(4) and 63.2450(k)(6), provide the information as specified in 40 CFR 63.11496(g)(4) and 63.2450(k)(6).
 - iv. A list of all transferred liquids that are reactive or resinous materials, as defined in 40 CFR 63.11502(b).
 - v. If you comply with provisions in an overlapping rule in accordance with 40 CFR 63.11500, identify the affected CMPU, heat exchange system, and/or wastewater system; provide a list of the specific provisions with which you will comply; and demonstrate that the provisions with which you will comply are at least as stringent as the otherwise applicable requirements, including

monitoring, recordkeeping, and reporting requirements, in 40 CFR 63 Subpart VVVVVV.

20. 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.
- 21a. Pursuant to 35 Ill. Adm. Code 218.505(d), every owner or operator of a single unit operation claiming a vent stream concentration exemption level, as set forth in 35 Ill. Adm. Code 218.500(d)(1), shall notify the Illinois EPA in writing if the vent stream concentration at any time equals or exceeds 500 ppmv, within 60 days after such event. Such notification shall include a copy of all records of such event.
- b. Pursuant to 35 Ill. Adm. Code 218.505(g), the owner or operator of a de minimis single unit operation or batch process train exempt from the control requirements of 35 Ill. Adm. Code 218.500(c) shall notify the Illinois EPA in writing if the uncontrolled total annual mass emissions from such de minimis single unit operation or batch process train exceed the threshold in 35 Ill. Adm. Code 218.500(c)(1) or (c)(2), respectively, within 60 days after the event occurs. Such notification shall include a copy of all records of such event.
- c. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 22a. 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 or 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 exceedances or deviation and efforts to reduce emissions and future occurrences.
- b. 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 - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this permit, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:VJB:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the chemical packaging 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 a throughput of 31.2 million gallons of liquid organic chemicals per year. The resulting maximum emissions are well below the levels (e.g., 100 tons/year for VOM, 10 tons per year for a single HAP, and 25 tons per year for any combination of such HAP), at which this source would be considered a major source for purposes 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>Emission Unit</u>	E M I S S I O N S (Tons/Year)						<u>Single HAP</u>	<u>Total HAPs</u>
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>			
Organic Liquid Storage Tanks					3.00			
Truck and Drum Filling Blending Tank Filling & Mixing			0.44		8.20			
Tank Truck Cleaning					6.30			
Wastewater Treatment Plant					1.60			
Fugitive Emissions	--	--			0.44			
Boilers and Heaters	--	--			2.70			
Total:	<u>3.02</u>	<u>3.60</u>	<u>0.27</u>	<u>0.02</u>	<u>0.20</u>	----	----	
	3.02	3.60	0.71	0.02	22.44	7.90	19.90	

VJB:psj

Attachment B -- Table 9 to Subpart VVVVVV of Part 63 --Applicability of
General Provisions to Subpart VVVVVV

As required in 40 CFR 63.11501(a), you must comply with the requirements of the NESHAP General Provisions (40 CFR Part 63, Subpart A) as shown in the following table.

Citation	Subject	Applies to Subpart VVVVVV?	Explanation
63.1(a)(1), (a)(2), (a)(3), (a)(4), (a)(6), (a)(10)-(a)(12) (b)(1), (b)(3), (c)(1), (c)(2), (c)(5), (e)	Applicability	Yes	
63.1(a)(5), (a)(7)-(a)(9), (b)(2), (c)(3), (c)(4), (d)	Reserved	No	
63.2	Definitions	Yes	
63.3	Units and Abbreviations	Yes	
63.4	Prohibited Activities and Circumvention	Yes	
63.5	Preconstruction Review and Notification Requirements	Yes	
63.6(a), (b)(1)-(b)(5), (b)(7), (c)(1), (c)(2), (c)(5), (e)(1)(iii), (g), (i), (j)	Compliance with Standards and Maintenance Requirements	Yes	
63.6(b)(6), (c)(3), (c)(4), (d), (h)(3), (h)(5)(iv)	Reserved	No	
63.6 (e)(1)(i) and (ii), (e)(3), and (f)(1)	SSM Requirements	No	
63.6(h)(1)-(h)(4), (h)(5)(i)-(h)(5)(iii), (h)(6)-(h)(9)		No	Subpart VVVVVV does not include opacity or visible emissions (VE) standards or require a continuous opacity monitoring system (COMS).
63.7(a)(1), (a)(3), (a)(4), (c), (e)(4), and (f)-(h)	Performance Testing Requirements	Yes	

Citation	Subject	Applies to Subpart VVVVVV?	Explanation
63.7(a)(2), (b), (d), (e)(1)-(3)	Performance Testing Schedule, Notification of Performance Test, Performance Testing Facilities, and Conduct of Performance Tests	Yes/No	Requirements apply if conducting test for metal HAP control; requirements in §§ 63.997(c)(1), (d), (e), and 63.999(a)(1) apply, as referenced in § 63.11496(g), if conducting test for organic HAP or hydrogen halide and halogen HAP control device.
63.8(a)(1), (a)(4), (b), (c)(1)-(c)(3), (f)(1)-(5)	Monitoring Requirements	Yes	References to SSM in § 63.8(c) do not apply.
63.8(a)(2)	Monitoring Requirements	No	
63.8(a)(3)	Reserved	No	
63.8(c)(4)		No	Continuous parameter monitoring system (CPMS) requirements in 40 CFR Part 63, subparts SS and FFFF are referenced from § 63.11496.
63.8(c)(5)		No	Subpart VVVVVV does not require COMS.
63.8(c)(6)-(c)(8), (d), (e), (f)(6)		Yes	Requirements apply only if you use a continuous emission monitoring system (CEMS) to demonstrate compliance with the alternative standard in § 63.11496(e). References to SSM in § 63.8(d) do not apply.

Citation	Subject	Applies to Subpart VVVVVV?	Explanation
63.8(g)(1)-(g)(4)		Yes	Data reduction requirements apply only if you use CEMS to demonstrate compliance with alternative standard in § 63.11496(e). COMS requirements do not apply. Requirement in § 63.8(g)(2) does not apply because data reduction for CEMS are specified in 40 CFR Part 63, Subpart FFFF.
63.8(g)(5)		No	Data reduction requirements for CEMS are specified in 40 CFR Part 63, Subpart FFFF, as referenced from § 63.11496. CPMS requirements are specified in 40 CFR Part 63, Subparts SS and FFFF, as referenced from § 63.11496.
63.9(a), (b)(1), (b)(2), (b)(4), (b)(5), (c), (d), (e), (i)	Notification Requirements	Yes	
63.9(b)(3), (h)(4)	Reserved	No	
63.9(f)		No	Subpart VVVVVV does not contain opacity or VE limits.
63.9(g)		Yes	Additional notification requirement applies only if you use CEMS to demonstrate compliance with alternative standard in § 63.11496(e).
63.9(h)(1)-(h)(3), (h)(5)-(h)(6)		Yes	Except Subpart VVVVVV does not contain opacity or VE limits.

Citation	Subject	Applies to Subpart VVVVVV?	Explanation
63.9(j)	Change in Information Already Provided	No	Notification of process changes that affect a compliance determination are required in § 63.11501(d)(4).
63.10(a)	Recordkeeping Requirements	Yes	
63.10(b)(1)		Yes	
63.10(b)(2)(i)- (b)(2)(v)		Yes	Any references to SSM do not apply.
63.10(b)(2)(vi), (x), (xi), (xiii)		Yes	Apply only if you use CEMS to demonstrate compliance with alternative standard in § 63.11496(e).
63.10(b)(2)(vii)- (b)(2)(ix), (b)(2)(xii), (b)(2)(xiv)		Yes	
63.10(b)(3)		Yes	
63.10(c)(1), (c)(5)- (c)(6), (c)(13)- (c)(14)		Yes	Apply only if you use CEMS to demonstrate compliance with alternative standard in § 63.11496(e).
63.10(c)(7)-(c)(8), (c)(10)-(c)(12), (c)(15)		Yes	Any reference to SSM does not apply.
63.10(c)(2)-(c)(4), (c)(9)	Reserved	No	
63.10(d)(1), (d)(2), (d)(4), (e)(1), (e)(2), (f)	Reporting Requirements	Yes	
63.10(d)(3)		No	Subpart VVVVVV does not include opacity or VE limits.
63.10(d)(5)		No	
63.10(e)(1)-(e)(2)		Yes	Apply only if you use CEMS to demonstrate compliance with alternative standard in § 63.11496(e).
63.10(e)(3)		Yes	
63.10(e)(4)		No	Subpart VVVVVV does not include opacity or VE limits.
63.11	Control Device Requirements	Yes	
63.12	State Authorities and Delegations	Yes	

Citation	Subject	Applies to Subpart VVVVVV?	Explanation
63.13	Addresses	Yes	
63.14	Incorporations by Reference	Yes	
63.15	Availability of Information and Confidentiality	Yes	
63.16	Performance Track Provisions	Yes	

VJB:psj