217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Hydrosol, Inc.
Attn: Edward S. Piszynski
8407 South 77th Avenue
Bridgeview, Illinois 60455

Application No.: 96030192
I.D. No.: 031027AAX
Applicant's Designation:
Date Received: March 11, 1996
Operation of: Aerosol Can Filling
Date Issued: November 1, 2000
Expiration Date[2]: November 1, 2005
Source Location: 8407 South 77th Avenue, Bridgeview, Cook County
Responsible Official: Mr. Edward S. Piszynski, Vice President, Laboratory Services

This permit is hereby granted to the above-designated Permittee to OPERATE a chemical preparation and aerosol can filling source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact David Hulskotter at 217/782-2113.

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

DES:DWH:psj

cc: Illinois EPA, FOS, Region 1

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Hydrosol, Inc.
8407 South 77th Avenue
Bridgeview, Illinois 60455
708/598-7100

I.D. No.: 031027AAX
Standard Industrial Classification: 7389, Aerosol Can Filling

1.2 Owner/Parent Company

Hydrosol, Inc.
8407 South 77th Avenue
Bridgeview, Illinois 60455

1.3 Operator

Hydrosol, Inc.
8407 South 77th Avenue
Bridgeview, Illinois 60455

Edward S. Piszynski
708/598-7100

1.4 General Source Description

Hydrosol, Inc. is a manufacturer of consumer aerosol products. The source includes paint and chemical compounding operations, aerosol can filling lines and associated booster pumps, storage tanks and boilers for steam production.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
C	Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
cm	centimeter
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
F	Fahrenheit
Ft^3	cubic foot
gal	Gallon
HAP	Hazardous Air Pollutant
Hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
in	inches
Kg	Kilogram
kPa	kilopascal
Kw	kilowatts
Lb	pound
Mg	Megagram
mmBtu	Million British thermal units
mo	Month
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
OM	Organic Material
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
ppmv	Parts per million volume
PSD	Prevention of Significant Deterioration
psi	pounds per square inch
psia	pounds per square inch absolute
scf	Standard cubic feet
SIP	State Implementation Plan

SO_2	Sulfur Dioxide
SOCMI	Synthetic Organic Chemical Manufacturing Industry
T	Ton
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TANKS	USEPA TANKS Program
TOC	Total Organic Carbon
TTV	Through-The-Valve
VOL	Volatile Organic Liquid
UTC	Under-The-Cup
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Underground storage tanks

Aboveground storage tanks

Underground mixing tanks

Liquid filling lines used for non-aerosol product filling

Aerosol can recovery unit, used to puncture damaged and defective filled aerosol cans to recover the contained liquids and propellants.

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Waterbath and conveyor fans

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit’s process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Emission Control Equipment
Group 1 – Aerosol Can Filling Lines	Through-The-Valve and Enhanced Under-The-Cup	Vapor Recovery Unit
Group 2 – Compounding Process	Compounding of Various Paint and Chemical Formulations	Dust Collector
Group 3 – Storage Tank	Fixed Roof Methylene Chloride Storage Tank	None
Group 4 - Boilers	Boiler 4	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VARIABLE emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

iii. All normal traffic pattern roads and parking facilities located at this source 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 [35 IAC 212.306].

c. 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 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

a. This stationary source, as defined in 40 CFR Section 68.3, is subject to 40 CFR Part 68, the Accidental Release Prevention regulations [40 CFR 68.215(a)(1)].

b. The owner or operator of a stationary source shall revise and update the RMP submitted, as specified in 40 CFR 68.190.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or

demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

N/A

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	85.39
Sulfur Dioxide (SO_2)	--
Particulate Matter (PM)	0.29
Nitrogen Oxides (NO_x)	1.97
HAP, not included in VOM or PM	3.63
TOTAL	91.28

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 including HAP emissions (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year, including HAP emissions.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VARIABLE Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a “cap and trade” market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold “allotment trading units” (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources’ CAAPP permits. These allotments are established from historical VOM emissions or “baseline emissions” lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account’s balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources’ transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the “Alternative Compliance Market Account” (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit. This limitation is established at the request of the

source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 IAC 205.205.

6.3 Recordkeeping and Reporting

a. The Permittee shall maintain the following records to determine compliance with the above limitation:

i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;

ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and

iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.

b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by November 30 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 35 IAC 205.300.

c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1 Aerosol Can Filling Lines

7.1.1 Description

The Permittee operates aerosol can filling lines that fill aerosol cans by either the through-the-valve method (TTV) or the under-the-cup (UTC) method with vapor recovery.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed
Aerosol Can Fillers	AFL-1: TTV* fill (Nalbach Liquid filler LF-1 and Nalbach Propellant filler PF-1)	1966
	AFL-2: TTV* fill (Nalbach Liquid filler LF-2 and Nalbach Propellant filler PF-2)	1966
	AFL-3: UTC* fill (Kartridge Pak Liquid filler LF-3, Kartridge Pak Propellant filler PF-3 and Aerofill zero emission Booster pump BP-3-1) controlled by Hydrosol vapor recovery unit VR-1	1973
	AFL-4: TTV* and UTC* fill (Kartridge Pak Liquid fillers LF-4-1 and LF-4-2, Kartridge Pak Propellant fillers PF-4-1 and PF-4-2 and Wheatley Booster pump BP-4-1) controlled by Hydrosol vapor recovery unit VR-1	1988
	AFL-5: Enhanced UTC* fill (MRM Elgin Liquid filler LF-5-1 and Kartridge Pak Liquid filler LF-5-2, Kartridge Pak Propellant filler PF-5 and Wheatley Booster Pump BP-4-2) controlled by Hydrosol vapor recovery unit VR-1	2000
	AFL-6: Enhanced UTC* fill (Kartridge Pak Liquid fillers LF-6-1 and LF-6-2, Kartridge Pak Propellant fillers PF-6 and Aerofill zero emission Booster pump BP-6-1) controlled by Hydrosol vapor recovery unit VR-1	1989

* TTV: Through-the-Valve
UTC: Under-the-Cup

7.1.3 Applicability Provisions and Applicable Regulations

a. An “affected aerosol can filling line” for the purpose of these unit-specific conditions, is an aerosol can filler and associated booster pump, used to fill aerosol cans with active ingredients and propellant. The booster pump associated with each aerosol can filler is used to provide high pressure insertion of propellant into each aerosol can. Each affected aerosol can filling line is identified in Condition 7.1.2.

b. Each affected aerosol can filling line is subject to 218.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, with the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.

c. An affected aerosol can filling line is subject to 35 IAC 218 Subpart DD: Aerosol Can Filling, because it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from process emission units that:

   i. Are not required by Subparts B, E, F (excluding 35 IAC 218.204(l)), H (excluding 35 IAC 218.405), Q, R, S, T (excluding 35 IAC 218.486), V, X, Y, Z, or BB, or

   ii. Are not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, wood furniture, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.

d. Each affected aerosol can filling line at the source is subject to 35 IAC 212.321, which provides that:

   i. 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, either alone or in combination with the emission of particulate matter from all other similar process emission units from 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 IAC 212.321 [35 IAC 212.321(a)].

ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected aerosol can filling lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

Where:

P = process weight rate; and,
E = allowable emission rate; and,

1. For process weight rates up to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

2. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

7.1.4 Non-Applicability of Regulations of Concern

N/A

7.1.5 Operational and Production Limits and Work Practices

a. Every owner or operator of an aerosol can filling line is subject to 35 IAC Part 218, Subpart DD, which provides that each affected aerosol can filling line shall comply with the following requirements:

i. Emission capture and control techniques which achieve an overall reduction in uncontrolled VOM emissions of at least 81% from the propellant filling area, also known as the gas house, on each line; or

ii. As an alternative to compliance with (i), the owner or operator of an aerosol can filling line shall comply with the following requirements:

A. Fill all cans, other than trial runs of cans to verify product quality, using through-the-valve fill or enhanced under-the-cup fill to minimize loss of VOM propellant; or use a reclamation system to recover surplus VOM propellant; or use another system approved in a federally enforceable permit which achieves at least 75% reduction of the emissions of under-the-cup fill;

B. Fill on a monthly basis at least 90% of cans filled on such aerosol can filling lines that are capable of being filled by through-the-valve method with through-the-valve fill. All cans shall be considered capable of being filled by the through-the-valve method unless, as demonstrated by the records required by 35 IAC 218.692(b)(2), the valve assembly is not adaptable to the through-the-valve fill; through-the-valve fill cannot be accomplished with at least 85% of the under-the-cup operating rate in cans per minute of filling; or performance, that is the discharge of the can's contents to accomplish its intended function, is negatively affected by through-the-valve fill considering factors such as propellant solubility in the can's contents and the amount of turbulence which the contents may experience during propellant filling; and

C. Verify proper filling of cans with a VOM monitoring system in the gas house. The system may monitor VOM concentration as a percentage of the lower explosive limit.

b. Every owner or operator of a propellant booster pump associated with an aerosol can filling line subject to 35 IAC Part 218, Subpart DD, which provides that each affected aerosol can filling line shall comply with one of the following requirements:

i. Emission capture and control techniques which achieve an overall reduction in uncontrolled VOM emissions of at least 81% from each pump. If the pumps are located in the gas house of a

filling line, compliance with this reduction may be achieved by the combination of the pumps located in the gas house and the propellant filling area; or

ii. Work practices to prevent leaks from a pump, meaning a loss of VOM from pump above background levels. Work practices shall include changing seals every four (4) weeks and plungers every 16 weeks unless a pump monitoring procedure approved in a federally enforceable permit establishes otherwise.

c. Production of VOC propelled cans shall not exceed the following limits:

Number of Cans Filled All Lines (Cans/Yr)
88,000,000

The above limitations were established in Permit 92080005, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

d. The enhanced under-the-cup method of filling shall be conducted only when the vapor recovery unit is in operation.

7.1.6 Emission Limitations

Emissions of VOM from the liquid fillers (LF), propellant fillers (PF) and booster pumps (BP) for each affected aerosol can filling line shall not exceed the following limits:

Emission Unit	Operating Hours (Hr/Yr)	VOM Emissions (Lb/Hr)	VOM Emissions (Ton/Yr)
LF-1	8,736	0.09	0.39
LF-2	8,736	0.09	0.39
LF-3	8,736	0.10	0.44
LF-4-1	8,736	0.05	0.25
LF-4-2	8,736	0.05	0.22
LF-6-1	8,736	0.05	0.22
LF-6-2	8,736	0.05	0.22
PF-1	8,736	0.07	0.31
PF-2	8,736	0.07	0.31
PF-3	8,736	1.48	6.46

Emission Unit	Operating Hours (Hr/Yr)	VOM Emissions (Lb/Hr)	(Ton/Yr)
PF-4-1	8,736	1.48	6.46
PF-4-2	8,736	0.10	0.44
PF-6	8,736	0.59	2.58
BP-3	8,736	1.50	6.55
BP-4-1	8,736	1.50	6.55
BP-4-2	8,736	1.50	6.55
BP-6	8,736	1.50	6.55
LF-5-1	6,600	0.05	0.17
LF-5-2	6,600	0.05	0.22
PF-5	6,600	0.58	1.94
		Total	47.16

The above limitations were established in Permits 92080005 and 00070077, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.1.7 Testing Requirements

Upon request by the Illinois EPA and/or USEPA, the VOM emissions from an affected aerosol can filling line shall be determined in accordance with Reference Method 25 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105.

7.1.8 Monitoring Requirements

N/A

7.1.9 Recordkeeping Requirements

a. In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected aerosol can filling line to demonstrate compliance with Conditions 5.5 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

i. A. Total number of cans filled by the through-the-valve method;

B. Total number of cans filled by the under-the-cup method;

C. Operating hours, in hr/mo;

D. Typical process weight rate, in lb/hr; and

E. VOM emissions.

ii. For those products not filled by the through-the-valve method which is to be relied upon by the Permittee to demonstrate that a product is not capable of being filled by through-the-valve method (Note: Each formulation in a particular type of can with a particular type of valve assembly shall be addressed separately as a unique product considering the range of models of cans and valve assemblies, e.g., suppliers, sizes and weights of the type used for such product):

A. Identifying information for the product type, including identification and description of the cans' contents, type and models of cans, type and models of valve assembly, and type of propellant and nominal propellant charge;

B. Whether the valve assembly is able to be through-the-valve filled;

C. For products not filled by use of through-the-valve method under-the-cup operating rate and projected through-the-valve fill operating rate;

D. Information addressing the impact of through-the-valve fill on performance;

E. Other supporting data; and

F. Whether the product is deemed capable of being filled by the through-the-valve method.

iii. The Permittee shall collect and record all of the following information each day for each line and maintain the information at the source for a period of three years:

A. Operating data for the line and fill systems;

B. Reclamation system monitoring data; and

C. Number of cans filled which are capable of being filled by means of through-the-valve fill, determined in accordance with the records kept pursuant to 35 IAC 218.692(b)(2) and percentage of such cans

actually filled using through-the-valve fill.

b. The Permittee shall maintain daily records of the following items for the booster pump on each affected aerosol can filling line complying by means of work practices:

i. Operating data for each pump, including date and time a leak in a pump is detected, date and time a leaking pump is removed from service and action taken to repair a pump [35 IAC 218.692(c)(2)(A)]; and

ii. A maintenance log for the pump, detailing all routing and nonroutine maintenance performed including dates and duration of any outages [35 IAC 218.692(c)(2)(B)].

c. The Permittee shall maintain records of the most recent stack test report for each affected aerosol can filling line.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of each affected aerosol can filling line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Notification within 30 days following the occurrence of a violation of any affected aerosol can filling line with the limitations of this section, as determined from the records required by Condition 7.1.9, with a copy of such record for each incident; and

b. At least 30 calendar days before changing the method of compliance with 35 IAC 218, Subpart DD, from the methods of filling cans to the use of capture systems and control devices, the owner or operator shall comply with the requirements of 35 IAC 218.692(a)(1). Upon changing the method of compliance with 35 IAC 218, Subpart DD, the owner or operator shall comply with all requirements of 35 IAC 218.692(a).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.5.1, 7.1.3(b) and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the formulas listed below:

a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation, maintenance and work-practices inherent in operation of an affected aerosol can filling line.

b. To determine compliance with Condition 7.1.3(b), the non-photochemical reactivity of VOM emissions from each affected aerosol can filling line shall be demonstrated through the use of VOM-containing materials whose volumetric portion of VOM within the material does not exceed the volumetric percentage thresholds which would render their VOM emissions photochemically reactive, pursuant to 35 IAC 211.4690.

c. To determine compliance with Conditions 5.5.1 and 7.1.6, VOM emissions from all affected aerosol can filling lines shall be calculated based on the following:

Emission Unit	Emission Factor	
LF-1	0.0785	Lb VOM/hr
LF-2	0.0785	Lb VOM/hr
LF-3	0.0698	Lb VOM/hr
LF-4-1	0.0235	Lb VOM/hr
LF-4-2	0.0236	Lb VOM/hr
LF-6-2	0.0236	Lb VOM/hr
LF-6-1	0.0260	Lb VOM/hr
PF-1	3.5×10^{-5}	Lb VOM/can
PF-2	3.5×10^{-5}	Lb VOM/can
PF-4-2	2.34×10^{-5}	Lb VOM/can
PF-3	3.39×10^{-3}	Lb VOM/can
PF-4-1	3.39×10^{-3}	Lb VOM/can
PF-6	1.75×10^{-3}	Lb VOM/can
BP-3	1	Lb VOM/hr
BP-4-1	1	Lb VOM/hr
BP-4-2	1	Lb VOM/hr
BP-6	1	Lb VOM/hr
LF-5-1	0.05	Lb VOM/hr
LF-5-2	0.05	Lb VOM/hr
PF-5	1.75×10^{-4}	Lb VOM/can

7.2 Group 2 Compounding Process

7.2.1 Description

Paint and non-paint compounding are being performed in the mixing tanks. Chemical raw materials are mixed and blended to produce intermediates for aerosol and non-aerosol can filling.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Description	Emission Control Equipment	Construction Dates
Compounding		
Building 6: Mixing Tanks K-01, K-02, K-03, K-09 and K-10; Sand Mill, K-D Mill, 8 Drum Mixing Stations and 4 Bin/Tank Mixing Stations	Dust Collector DC-1	K-01 1978 K-02 1978 K-03 1978 K-09 1981 K-10 1984 Drum Mixing 1978 Bin Mixing 1978
Building 223: Mixing Tanks K-12, K-13, K-14, K-15, K-16, K-17 and K-18; 100 Gallon Transfer Tank	None	K-12 & K-13 1988 K-14 & K-15 1988 K-16 & K-17 1991 K-18 1997 Transfer Tank 1991

7.2.3 Applicability Provisions and Applicable Regulations

a. The affected mixing tanks are subject to 35 IAC 218 Subpart AA: Paint and Ink Manufacturing because it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate.

b. 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 plant or premises, exceeds the allowable emission rates specified in the following equation [35 IAC 212.321]:

$$E = A(P)^B$$

Where:

P = process weight rate; and,
E = allowable emission rate; and,

For process weight rates up to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

7.2.4 Non-Applicability of Regulations of Concern

An affected mixing tank is not subject to 35 IAC 218.301 because this process is exempted as per 35 IAC 218.304.

7.2.5 Control Requirements

a. The owner or operator shall equip tanks storing VOL with a vapor pressure greater than 10 kPa (1.5 psi) at 20°C (68°F) with pressure/vacuum conservation vents set as a minimum at +/-0.2 kPa (0.029 psi). These controls shall be operated at all times. An alternative air pollution control system may be used if it results in a greater emission reduction than these controls. Any alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.

b. Stationary VOL storage containers with a capacity greater than 946 liter (250 gal) shall be equipped with a submerged-fill pipe or bottom fill. These controls shall be operated at all times. An alternative control system can be allowed only if approved by the Illinois EPA and approved by the USEPA as a SIP revision.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected paint manufacturing operation is subject to the following:

Emissions from all paint manufacturing and non-paint manufacturing compounding operations shall not exceed the following limits:

Emission Unit	VOM Emissions (Lb/Hr)	VOM Emissions (T/Yr)
(1) 3,000 gal Mixing Tank (K-15)	0.71	1.56
(6) 10,000 gal Mixing Tanks (K-12, K-13, K-14, K-16, K-17 & K-18)	25.58	56.28

Compliance with annual limits shall be determined from a running total of 12 months data.

The above limitations were established in Permit 78010005, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. This permit is based on negligible emissions of volatile organic material from mixing tank K-18. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

The above limitations were established in Permit 97040062, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.2.7 Operating Requirements

a. Open-Top Mills, Tanks, Vats, or Vessels [35 IAC 218.624]:

No person shall operate an open-top mill, tank, vat, or vessel with a volume of more than 45 liter (12 gal) for the production of paint or ink unless:

i. The mill, tank, vat, or vessel is equipped with a cover which completely covers the mill, tank, vat, or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1.27 cm (0.5 in.) beyond the outer rim of the opening or be attached to the rim.

ii. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.

iii. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.

b. Grinding Mills [35 IAC 218.625]:

i. No person shall operate a grinding mill for the production of paint or ink which is not maintained in accordance with the manufacturer's specifications.

ii. No person shall operate a grinding mill fabricated or modified after the effective date of this Subpart which is not equipped with fully enclosed screens.

iii. The manufacturer's specifications shall be kept on file at the plant by the owner or operator of the grinding mill and be made available to any person upon verbal or written request during business hours.

c. Clean Up [35 IAC 218.630]:

i. No person shall clean paint or ink manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.

ii. No person shall store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere.

7.2.8 Monitoring Requirements

Leaks [35 IAC 218.628]:

The owner or operator of a paint or ink manufacturing source shall, for the purpose of detecting leaks, conduct an equipment monitoring program as set forth below [35 IAC 218.628]:

a. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.

b. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent VOM by weight which appears to be leaking on the basis of sight, smell or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.

c. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.

d. When a leak is detected, the owner or operator shall record the date of detection and repair and the record shall be retained at the source for at least two years from the date of each detection or each repair attempt. The record shall be made available to any person upon verbal or written request during business hours.

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected compounding operations, pursuant to Section 39.5(7)(b) of the Act:

a. Solvent usage [Solvent purchased + solvent in beginning inventory - solvent in ending inventory], in gal/yr.

b. Beginning inventory, in gal.

c. Ending inventory, in gal.

d. Solvent purchased, in gal.

e. Density of each solvent used, in lb/gal.

f. MSDS of each solvent and any other VOM containing raw material used.

g. VOM emissions (ton/yr).

h. Record indicating compliance with 35 IAC 218.624.

i. The manufacturer’s specifications for the grinding mills and record indicating compliance with 35 IAC 218.625.

j. Vapor pressure of all VOL in kPa or psi at 68°F or 20°C and MSDS of all VOL stored in the tanks and record indicating compliance with 35 IAC 218.626.

k. Records indicating an equipment monitoring program for detection of leaks is in place and all the record indicating compliance with 35 IAC 218.628.

l. Records indicating compliance with 35 IAC 218.630.

m. Records of maximum process weight rate (lb/hr).

n. Records of HAP emissions (ton/yr).

7.2.10 Reporting Requirements

a. The owner or operator of a subject process shall promptly notify the Illinois EPA, Compliance Section, of noncompliance with the control and operating requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act.

i. Annual Emissions Report

Annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous year.

iii. Report Deviation

A. Report of any deviation from the applicable permit requirements of Condition 5.2.2 shall be reported to the Illinois EPA within 30 days of such occurrence. The report shall include the identity of the requirements for which a deviation occurred, a description of the deviation, its probable cause, and any corrective actions or preventive measures taken [39.5(7)(f)(ii) of the Act].

B. Report of any violation of the requirements of 35 IAC 218 Subpart AA by sending a copy of any record showing a violation to the Illinois EPA, Compliance Section, within 30 days following the occurrence of the violation [35 IAC 218.990(a)(3)].

b. At least 30 calendar days before changing the method of compliance for an affected paint manufacturing operation, the applicable emission determination method indicated in Condition 7.2.12, the Permittee shall certify to the Illinois EPA that the paint

manufacturing operation will be in compliance with the applicable limitation of this permit consistent with the requirements of compliance certification reports of Condition 9.8.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected paint manufacturing operation without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of any solvent, without exceeding the permitted emissions of Conditions 5.5.1 and 7.2.6.

7.2.12 Compliance Procedures

The recordkeeping requirements in Condition 7.2.9 and the emission calculation methodology described below shall be used to determine emissions:

a. Emissions from Paint Manufacturing:

VOM Emission (lb/yr) = Solvent Usage (gal/yr) * Solvent Density (lb/gal) * 0.015.

The emission factor of 0.015 for paint manufacturing is from Table 5.10-1, AP-42, Volume I, Supplement F, October, 1996.

b. Maximum particulate emission (lb/hr) shall be determined by using the equation of Condition 7.2.3(b) and the recordkeeping requirements of Condition 7.2.9.

c. Emissions for non-paint product compounding:

VOM Emission (lb/yr) = Solvent Usage (gal/yr) * Solvent Density (lb/gal) * 0.0075.

Because energy requirements and mixing times are considerably reduced for non-paint product compounding, a reduced emission factor is applied.

d. For mixing tanks utilizing closed containers, pressure relief valves and relatively non-fluctuating temperature conditions:

For the purposes of estimating VOM emissions the current version of the TANKS Program is acceptable.

7.3 Group 3 Storage Tanks
Fixed roof storage tanks

7.3.1 Description

The Permittee utilizes a 10,000 gallon fixed roof storage tank to store methylene chloride (dichloromethane). Permanent submerged loading must be used on this tank, minimizing turbulence and evaporation of OM during loading.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Date of Construction	Description	Emission Control Equipment
Tank 47	1998	Fixed roof tank used for storing methylene chloride	Permanent submerged loading pipe

7.3.3 Applicability Provisions and Applicable Regulations

An “affected tank” for the purpose of these unit-specific conditions, is a storage tank that is only subject to 35 IAC 218.122(b). A storage tank is subject to the requirements of 35 IAC 218.122(b) if the tank has a capacity greater than 250 gallons and is used to store an organic material with a vapor pressure of 2.5 psia or greater at 70°F.

7.3.4 Non-Applicability of Regulations of Concern

N/A

7.3.5 Control Requirements

Each affected tank shall be equipped and operated with a permanent submerged loading pipe, pursuant to 35 IAC 218.122(b). (The Illinois EPA has not approved use of other equivalent equipment in lieu of a permanent submerged loading pipe.)

7.3.6 Emission Limitations

N/A

7.3.7 Operating Requirements

None

7.3.8 Inspection Requirements

None

7.3.9 Recordkeeping Requirements

a. In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected tank to demonstrate compliance with Condition 7.3.5, pursuant to Section 39.5(7)(b) of the Act:

   i. Design information for the tank showing the presence of a permanent submerged loading pipe; and

   ii. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe.

b. The Permittee shall maintain records of the following items on a monthly basis for the previous month:

   i. The throughput of each organic liquid through the affected tank;

   ii. The organic material (OM) emissions attributable to each organic liquid stored at the source, tons/month, with supporting calculations, calculated utilizing an approved USEPA methodology, such as the TANKS program; and

   iii. Total emissions of each individual HAP, and combined HAPs, tons/month, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance with the control and operating requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act:

Any storage of organic material in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.4.5, e.g., no “permanent submerged loading pipe,” within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7 and the use of USEPA approved emissions estimating guidance.

For the purpose of estimating organic material emissions from the storage tank, the current version of the TANKS Program is acceptable.

7.4 Group 4 Boilers

7.4.1 Description

A Cleaver-Brooks boiler is fired by natural gas and is rated at 4.5 million Btu per hour. It is used only during the heating season.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed
B4	Boiler 4	1997

7.4.3 Applicable Regulations

a. An affected boiler for the purpose of these unit specific conditions is boiler listed in Condition 7.2.2.

b. An affected boiler is subject to the opacity limits identified in Condition 5.2.2(c).

7.4.4 Non-Applicability of Regulations of Concern

a. The affected boiler is not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).

b. The boiler is not subject to 35 IAC 216.121, emissions of CO from existing fuel combustion emission units, because the actual heat input of each affected boiler is less than 2.9 MW (10 mmBtu/hr).

c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.4.5 Operational and Production Limits and Work Practices

The affected boiler shall only be operated with natural gas as the fuel.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the affected boilers are subject to the following:

Emissions and operation of Boiler 4 shall not exceed the following limits:

	Firing Rate (10^6 Btu/Hr)	Nitrogen Oxides Emissions (Lb/Hr)	(Ton/Yr)
Boiler 4	4.5	0.45	1.68

These limits are based on maximum firing rte, operating hours (7,488 hr/yr), and standard emission factors for natural gas. Compliance with annual limits shall be determined from running total of 12 months of data.

The above limitations were established in Permit 97040062, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. Total natural gas usage for the affected boiler (ft^3/year); and

b. Annual aggregate NO_x, PM, SO_2, and VOM emissions from the affected boiler, based on fuel consumption and the applicable emission factors.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

a. Notification within 60 days of operation of an affected boiler that may not have been in compliance with the opacity limitations in Condition 5.2.2(b), with a copy of such record for each incident.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

a. Compliance with the emission limits in Conditions 5.5.1 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

i. Emissions from the affected boilers burning natural gas shall be calculated based on the following emission factors:

Pollutant	Emission Factor ($lb/10^6\ ft^3$)
PM	1.9
SO_2	0.6
VOM	5.5
NO_x	100

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 MBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, March 1998.

Boiler Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after September 1, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (“Title I provisions”) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

DWH:psj

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Hydrosol, Inc. is a manufacturer of consumer aerosol products. The source includes paint and chemical compounding operations, aerosol can filling lines and associated booster pumps, storage tanks and boilers for steam production.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Emission Control Equipment
Group 1 – Aerosol Can Filling Lines	Through-The-Valve and Enhanced Under-The-Cup	Vapor Recovery Unit
Group 2 – Compounding Process	Compounding of Various Paint and Chemical Formulations	Dust Collector
Group 3 – Storage Tank	Fixed Roof Methylene Chloride Storage Tank	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	85.38
Sulfur Dioxide (SO_2)	--
Particulate Matter (PM)	--
Nitrogen Oxides (NO_x)	5.0
HAP, not included in VOM or PM	3.63
TOTAL	89.01

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP

application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board’s emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source’s permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

DWH:psj