

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	10
5.0 OVERALL SOURCE CONDITIONS	12
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 EMISSION REDUCTION MARKETING SYSTEM	17
6.1 Description of ERMS	
6.2 Applicability	
6.3 Obligation to Hold Allotment Trading Units	
6.4 Market Transaction	
6.5 Emission Excursion Compensation	
6.6 Quantification of Seasonal VOM Emissions	
6.7 Annual Account Reporting	
6.8 Allotment of ATUs to the Source	
6.9 Recordkeeping for ERMS	

		<u>PAGE</u>
	6.10 Federal Enforceability	
	6.11 Exclusions from Further Reductions	
7.0	UNIT SPECIFIC CONDITIONS	25
	7.1 Unit 01 Reactors and Thindown Tanks Control Scrubbers/Condensers	
	7.2 Unit 02 Portable and Fixed Tank Coating Production Control Dust Collectors/Conservation Vents	
8.0	GENERAL PERMIT CONDITIONS	45
	8.1 Permit Shield	
	8.2 Applicability of Title IV Requirements	
	8.3 Emissions Trading Programs	
	8.4 Operational Flexibility/Anticipated Operating Scenarios	
	8.5 Testing Procedures	
	8.6 Reporting Requirements	
	8.7 Obligation to Comply with Title I Requirements	
9.0	STANDARD PERMIT CONDITIONS	50
	9.1 Effect of Permit	
	9.2 General Obligations of Permittee	
	9.3 Obligation to Allow Illinois EPA Surveillance	
	9.4 Obligation to Comply with Other Requirements	
	9.5 Liability	
	9.6 Recordkeeping	
	9.7 Annual Emissions Report	
	9.8 Requirements for Compliance Certification	
	9.9 Certification	
	9.10 Defense to Enforcement Actions	
	9.11 Permanent Shutdown	
	9.12 Reopening And Reissuing Permit For Cause	
	9.13 Severability Clause	
	9.14 Permit Expiration and Renewal	
10.0	ATTACHMENTS	
	10.1 Attachment 1 - Process Weight Rate	1-1
	10.2 Attachment 2 - Example Certification by a Responsible Official	2-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Dexter Corporation
One East Water Street
Waukegan, Illinois 60085
847/623-4200

I.D. No.: 097190AAE
Standard Industrial Classification: 2851 (Paints, varnishes,
lacquers, enamels, allied
products and plastic
materials, synthetic resins,
and nonvulcanizable
elastomers).
2821 (Resin production)

1.2 Owner/Parent Company

Dexter Corporation
One Elm Street
Windsor Locks, Connecticut 06096

1.3 Operator

Dexter Corporation
One East Water Street
Waukegan, Illinois 60085

Hugh A. Flack Jr./Director, Health, Safety, and Environmental
847/625-3370

1.4 General Source Description

Dexter Corporation is located at One East Water Street, Waukegan.
The source manufactures a variety of different coatings: Paints,
varnishes, lacquers, enamels, synthetic resins, and nonvulcanized
elastomers.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
Agency	Illinois Environmental Protection Agency
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
ATU	Allotment Trading Unit
BAT	Best Available Technology
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	Emission Reduction Marketing System
°F	Fahrenheit
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification number of source, assigned by the Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
in	inch
KPa	Kilopascal
Kg	Kilogram
KW	Kilowatts
l	Liter
LAER	Lowest Achievable Emission Rate
lb	pound
LEL	Lower Explosive Limit
m ³	Cubic meter
MACT	Maximum Achievable Control Technology
Mbtu	Million Btu
Mg	Megagram
min	Minute
mmBtu	Million British thermal units
mmft ³	Million cubic feet
mmscf	Million standard cubic foot
mo	month

FINAL DRAFT CAAPP PERMIT
Dexter Corporation
I.D. No.: 097190AAE
Application No.: 96030174
November 5, 1999

MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PAL	Plant wide Applicability Limit
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
psi	Pound per square inch
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
T1	Title I - Identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - Identifies Title I conditions that are being established in this permit
T1R	Title I Revision - Identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
T	Ton
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
VOL	Volatile Organic Liquid
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:

Mini batch agitation stations
Pre-batch area
Tank HSO2 (aboveground)
Tanks W01 (aboveground), W02 (aboveground), and W03 (aboveground)
Horizontal mills
Tank DST 5000 (aboveground)
Tanks ST11, ST12 (aboveground)
Underground storage tanks and apertures

- T101-S12 Horizontal Tank
- T102-S36 Horizontal Tank
- T103-S191 Horizontal Tank
- T104-S52 Horizontal Tank
- T105-S16 Horizontal Tank
- T106-S91 Horizontal Tank
- T107-S118 Horizontal Tank
- T108-S194 Horizontal Tank
- T109-S17 Horizontal Tank
- T110-S57 Horizontal Tank
- T111-S240 Horizontal Tank
- T112-S23 Horizontal Tank
- T113-S67 Horizontal Tank
- T114-S6 Horizontal Tank
- T115-S48 Horizontal Tank
- T116-S104 Horizontal Tank
- T117-S34 Horizontal Tank

Tank ST03 (aboveground)
East and west wash tanks (aboveground)
Tanks T-131, T-132, and T-133 (aboveground)
Intermix system
Solvent storage tanker truck
Solvent distillation unit

- 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:

None

- 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 provided the tank is not used for the storage of gasoline or any listed hazardous air pollutant pursuant to section 112(b) of the clean air act.

- 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	Date Constructed	Emission Control Equipment
01	Reactor (RK4)(120 Gal)	1950	Scrubber/Condenser
	Natural gas heated (2.05 mmBtu/Hr) pressure/vacuum reactor (RK5) (2200 gal)	1950	Scrubber/Condenser
	Natural gas heated (2.05 mmBtu/Hr) hot oil boiler to heat pressure/vacuum reactor (RK10) (2200 gal)	1977	Scrubber/Condenser
	4400 gal thindown tank (RT5)	1964	Condenser
	4400 gal thindown tank (RT6)	1967	Condenser
	3500 gal thindown tank (RT10)	1964	N/A
	6000 gal thindown tank (RT11)	1986	Condenser
02	High Speed Dispersers (mixers) - Bldg P HSD 001	1994	Dust Collector
	High Speed Dispersers (mixer) - Bldg Q HSD601, HSD603, HSD605-617, HSD619-620	1994	Dust Collector
	Dispersion Tanks - Bldg P T201, T202, T204, T205, T206, T207, T332	1994	Bag Dump Stations Conservation Vents
	Thindown Tanks - Bldg P T301, T302, T303, T305-T308, T310, T311, T313	1994	Conservation Vents
	Blend Tanks - Bldg Q T325-T331, T355, T356, T358, T359, T453	1994	Conservation Vents
	Blend Tanks - Bldg S ST1-ST10, ST13-18	1973	Dust Collector
	Dispersion Tanks - Bldg S SM1-SM6	1973	Dust Collector
	Kettles - Bldg S SK1-2	1973	Condenser

FINAL DRAFT CAAPP PERMIT
 Dexter Corporation
 I.D. No.: 097190AAE
 Application No.: 96030174
 November 5, 1999

Emission Unit	Description	Date Constructed	Emission Control Equipment
	High Speed Dispersers (mixers) - Bldg S SH1-SH12, SH14-SH26, SA1, SA2	1973	Dust Collector
	High Speed Dispersers (mixer) - Bldg S SFH1, SFH2, SWH1	1973	N/A
	Portable tank washer	1995	Condenser
	Hand Washing		N/A
	Baking Soda Cleaner	1999	Dust Collection Booth
Fugitive VOM and Particulate Emission	-VOM equipment leaks and solvent cleanup -Parking lot and driveway particulates	-	

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 VOM emissions.

5.1.2 This permit is issued based on the source being a major source of HAPs.

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. 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.

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 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

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:

N/A

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)	99.3
Sulfur Dioxide (SO ₂)	0.1
Particulate Matter (PM)	9.0
Nitrogen Oxides (NO _x)	14.6
HAP, not included in VOM or PM	0.0
TOTAL	123.0

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 (Unit Specific Conditions) of this permit.

5.6.5 Records for Operating Scenarios

N/A

5.6.6 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 noncompliance 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.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating 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 EMISSION 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 further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, 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 during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An 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 account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its 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 emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 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 (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

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).

- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for

such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover

the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This

report shall include the following information [35 IAC 205.300]:

- i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 325 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 36.9269 tons.

- A. This determination includes the use of 1992 and 1993 as baseline seasons. This determination includes use of the 1992 and 1993 season as a substitute for the 1994, 1995, and 1996 season due to non-representative conditions in this season as allowed by 35 IAC 205.320(a).
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units
- Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

FINAL DRAFT CAAPP PERMIT
Dexter Corporation
I.D. No.: 097190AAE
Application No.: 96030174
November 5, 1999

None

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Resin Manufacturing Line

7.1.1 Description

The Permittee operates three reactors with associated controls which aid in the production of various types of resins and other intermediates used in the formulation of batch coatings. Other associated processing equipment includes thindown tanks which, in addition to resin production, are also utilized for clear coat production.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Reactor (RK4) (120 Gal)	1950	Scrubber/Condenser
	Natural gas heated (2.05 mmBtu/Hr) pressure/vacuum reactor (RK5) (2200 gal)	1950	Scrubber/Condenser
	Natural gas heated (2.05 mmBtu/Hr) hot oil boiler to heat pressure/vacuum reactor (RK10) (2200 gal)	1977	Scrubber/Condenser
	4400 gal thindown tank (RT5)	1964	Condenser
	4400 gal thindown tank (RT6)	1967	Condenser
	3500 gal thindown tank (RT10)	1964	N/A
	6000 gal thindown tank (RT11)	1986	Condenser

7.1.3 Applicability Provisions and Applicable Regulations

- a. Reactors RK4, RK5, RK10, and thindown tanks RT5, RT6, RT10, and RT11 are "affected reactor trains" for the purpose of these unit-specific conditions.

- b. For purposes of coating production, thindown tanks RT5, RT6, RT10, and RT11 are "affected thindown tanks".
- c. The affected reactor trains are subject to 35 IAC 218 Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes when the reactor trains are used to manufacture resins. Pursuant to 35 IAC 218.966(a), every owner or operator of a miscellaneous organic chemical manufacturing process emission unit subject to 35 IAC 218 Subpart RR shall employ emission capture and control techniques which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit. [35 IAC 218.966(a)]
- d. The Permittee shall implement the following control measures for leaks from components subject to the control requirements of Section 218.966 shall be subject to:
 - i. Repair any component from which a leak of VOL can be observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found, unless the leaking component cannot be repaired until the process unit is shut down, in which case the leaking component must be repaired before the unit is restarted.
 - ii. For any leak which cannot be readily repaired within one hour after detection, the following records, as set forth in this subsection, shall be kept. These records shall be maintained by the owner or operator for a minimum of two years after the date on which they are made. Copies of the records shall be made available to the Illinois EPA or USEPA upon verbal or written request.
 - A. The name and identification of the leaking component;
 - B. The date and time the leak is detected;
 - C. The action taken to repair the leak; and

- D. The date and time the leak is repaired.
- e. The affected reactor trains are subject to 35 IAC 218 Subpart G, Use of Organic Material, which provides that:
 - i. 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. [35 IAC 218.301]
- f. The affected thindown tanks are subject to 35 IAC 218 Subpart AA, Paint and Ink Manufacturing, when used to manufacture coatings, which provides that no person shall operate an open-top mill, tank, vat or vessel with a volume of more than 45 l (12 gal) for the production of paint 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.
- g. 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. [35 IAC 218.630]

- h. 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. [35 IAC 218.630]
- i. The affected reactor trains are subject to the identified in Condition 5.2.2.
- j. Except as further provided, 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 IAC 212.321. [35 IAC 212.321]
- k. Except as further provided, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322. [35 IAC 212.322]

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected reactor trains are not subject to the NESHAP for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, 40 CFR 63, Subpart F, because the source does not manufacture as a primary product one or more of the chemicals listed in table 1 of 40 CFR 63 Subpart F.
- b. The affected reactor trains are not subject to the requirements of 35 IAC 218 Subpart Q, Leaks from

Synthetic Organic Chemical and Polymer Manufacturing Plants, pursuant to 35 IAC 218.421 because these components are not used to manufacture the synthetic organic chemicals or polymers listed in Appendix A of 35 IAC Part 218.

- c. The affected reactor trains are not subject to the NESHAP for Amino/phenolic Resin manufacture, because the raw materials used are not phenol or formaldehyde, but rather bis phenol A and para-formaldehyde which makes the manufactured product succinctly different than identified in 40 CFR Part 63 Subpart 000.

7.1.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel fired for the affected reactors.
- b. The Permittee shall follow good operating practices for the condensers, including periodic inspection, routine maintenance and prompt repair of defects.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected reactor trains are subject to the following:

N/A

7.1.7 Testing Requirements

Pursuant to 35 IAC 218.968(a), when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with Condition 7.1.3(b) (see also 35 IAC 218.966), the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart RR shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105, as follows:

- a. For control device efficiency testing and monitoring, the control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow

rates in accordance with the gas phase test methods specified in Condition 7.1.7(c) (see also 35 IAC 218.105(f)) [35 IAC 218.105(d)(1)].

- b. The overall efficiency of the emission control system shall be determined as the product of the capture system efficiency and the control device efficiency or by the liquid/liquid test protocol as specified in 40 CFR 60.433 for each solvent recovery system. In those cases in which the overall efficiency is being determined for an entire line, the capture efficiency used to calculate the product of the capture and control efficiency is the total capture efficiency over the entire line [35 IAC 218.105(e)(1)].
- c. Volatile Organic Material Gas Phase Source Test Methods: The methods in 40 CFR Part 60, Appendix A, delineated below shall be used to determine control device efficiencies:
 - i. 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 min, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times [35 IAC 218.105(e)(1)];
 - ii. 40 CFR Part 60, Appendix A, Method 1 or 1A, shall be used for sample and velocity traverses [35 IAC 218.105(e)(2)];
 - iii. 40 CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D, shall be used for velocity and volumetric flow rates [35 IAC 218.105(e)(3)];
 - iv. 40 CFR Part 60, Appendix A, Method 3, shall be used for gas analysis [35 IAC 218.105(e)(4)];

- v. 40 CFR Part 60, Appendix A, Method 4, shall be used for stack gas moisture [35 IAC 218.105(e)(5)];
- vi. 40 CFR Part 60, Appendix A, Methods 2, 2A, 2C, 2D, 3 and 4, shall be performed, as applicable, at least twice during each test run [35 IAC 218.105(e)(6)]; and
- vii. Use of an adaptation to any of the test methods specified in Conditions 7.1.7(c)(i), (ii) (iii), (iv), (v), and (vi) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) may not be used unless approved by the Illinois EPA and the USEPA on a case by case basis. An owner or operator must submit sufficient documentation for the Illinois EPA and the USEPA to find that the test methods specified in Conditions 7.1.7(c)(i), (ii) (iii), (iv), (v), and (vi) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) will yield inaccurate results and that the proposed adaptation is appropriate [35 IAC 218.105(e)(7)].

7.1.8 Monitoring Requirements

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

- iii. 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.
- iv. 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.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected reactor train to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of the efficiency of each capture system and control device pursuant to Condition 7.1.7, which include the following [Section 39.5(7)(e) of the Act]:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and

- vi. The operating conditions as existing at the time of sampling or measurement.
- b. Records of the following information each day, for each capture and control system associated with an affected reactor train and maintain the information at the source for a period of three years: [35 IAC 218.991(a)(2)]
 - i. Control device monitoring data [35 IAC 218.991(a)(2)(A)];
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission unit [35 IAC 218.991(a)(2)(B)]; and
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages [35 IAC 218.991(a)(2)(C)].
- c. For any leak of a component which cannot be readily repaired within one hour after detection, the following records: [35 IAC 218.966(c)(2)]
 - i. The name and identification of the leaking component [35 IAC 218.966(c)(2)(A)];
 - ii. The date and time the leak is detected [35 IAC 218.966(c)(2)(B)];
 - iii. The action taken to repair the leak [35 IAC 218.966(c)(2)(C)]; and
 - iv. The date and time the leak is repaired [35 IAC 218.966(c)(2)(D)].
- d. Records on the condensers:
 - i. Records for periodic inspection of the condensers with date, individual performing the inspection, and nature of inspection; and

- ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. The following Production records
- i. Monthly and annual records of the pounds of resin products produced from the affected reactor trains to verify compliance with Condition 5.5.1.
 - ii. Monthly and annual records of the gallons of coatings produced in the thindown tanks to verify compliance with Condition 5.5.1.
 - iii. Aggregate monthly and annual VOM and PM emissions from each affected reactor train based on the pounds of resin, gallon of coatings, and the custom emission factors found in Condition 7.1.12 to verify compliance with Condition 5.5.1.
 - iv. Monthly and annual records of solid material handled (e.g. pigment) in ton/mo and ton/yr to verify compliance with Condition 5.5.1.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected reactor trains 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 the affected reactor trains with the conditions of this section with a copy of such record for each incident.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.1.3(e) is assumed by proper operation of the condensers and scrubber, as addressed by Condition 7.1.5(b).
- b. To determine compliance with Conditions 5.5.1, VOM emissions from the affected reactor trains shall be calculated based on the following:

VOM Calculations For Resin Production:

$$\text{VOM (ton/mo)} = [(\text{Lb resin/mo}) \times (.0085 \text{ Lb VOM/Lb resin})] / 2000 \text{ Lb/ton}$$

The facility shall use the allowable emission factor of 0.0085 Lb VOM/Lb resin as established in permit 93110003 for VOM emission calculations for resin manufacturing.

VOM Calculations For Coating Production:

$$\text{VOM (ton/mo)} = [(\text{gal coating/mo}) \times (.0042 \text{ Lb VOM/Gal coating})] / 2000 \text{ Lb/ton}$$

Compliance with annual limits 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).

PM Emissions Calculations:

$$\text{Particulate Emissions (ton/mo)} = [\text{Solid Material handled (ton/mo)} \times (.005 \times (1 - \text{control device efficiency}(\%)))]$$

* Emission factor for PM is equal to 0.5% of weight of solid material handled established in section 6.4, AP-42, Fifth Edition.

7.2 General Paint Production

7.2.1 Description

The Permittee manufactures paints and coatings utilizing a variety of mixers, kettles, and tanks. A new coating production department was added to the source in 1994 pursuant to construction permit 93110003.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Installation Date	Emission Control Equipment
02	High Speed Dispersers (mixer) - Bldg P HSD 001	1994	Dust Collector
	High Speed Dispersers (mixer) - Bldg Q HSD601, HSD603, HSD 605-617, HSD 619-620	1994	Dust Collector
	Dispersion Tanks - Bldg P T-201, T-202, T-204, T-205, T-206, T-207, T-332	1994	Bag Dump Stations Conservation Vents
	Thindown Tanks - Bldg P T-301, T-302, T-303, T-305, T-308, T-310, T-311, T-313	1994	Conservation Vents
	Blend Tanks - Bldg Q T-325-T-331, T-355, T-356, T-358, T-359, T-453	1994	Conservation Vents
	Blend Tanks - Bldg S ST-1-ST-10, ST-13-ST-18	1973	Dust Collector
	Dispersion Tanks - Bldg S SM-1-SM-6	1973	Dust Collector
	Kettles - Bldg. S SK-1, SK-2	1973	Condenser
	High Speed Dispersers (mixer) - Bldg S SH-1-SH-12, SH-14-SH-26, SA-1, SA-2	1973	Dust Collector
	High Speed Dispersers (mixer) - Bldg S, First Floor SFH-1, SFH-2, SWH-1	1973	N/A
	Portable Tank Washer	1995	Condenser
	Hand Washing		N/A

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected paint manufacturing operation" for the purpose of these unit-specific conditions, is each operation described in Condition 7.2.2.
- b. The affected paint manufacturing operations is subject to the emission limits identified in Condition 5.2.2.
- c. The affected paint manufacturing operations are subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because the source has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate. These requirements are described in Condition 7.1.5.
- d. The affected paint manufacturing operations is subject to 35 IAC Section 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.
- e. The affected paint manufacturing operations are subject to 35 IAC 212.321(b)(1), which provides that:

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 IAC 212.321 and Section 10 attachment A.

7.2.4 Non-Applicability of Regulations of Concern

The affected paint manufacturing operation is not subject to 35 IAC, Subpart TT, Other Emission Units because the affected paint manufacturing operation is subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing.

7.2.5 Operational and Production Limits and Work Practices

Pursuant to 35 IAC Part 218, Subpart AA, the Permittee shall comply with the following requirements for the affected paint manufacturing operation:

- a. Open-top mills, tanks, vats or vessels [35 IAC 218.624]
 - i. Each mill, tank, vat or vessel shall be 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 shall remain closed except when production, sampling, maintenance or inspection procedures require access.
 - iii. The cover shall be maintained in good condition such that, when in place, it maintains contact the rim of the opening for at least 90 percent of the circumference of the rim.
- b. Leaks [35 IAC 218.628]
 - i. 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.
 - ii. 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.

- iii. 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.
 - iv. When a leak is detected, the Permittee 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.
- c. Grinding Mill [35 IAC 218.625]
- i. A grinding mill shall not be operated for the production of paint or ink if it is not maintained in accordance with the manufacturer's specifications.
 - ii. Shall be equipped with fully enclosed screens.
 - iii. The manufacturer's specifications shall be kept on file at the plant and be made available to any person upon verbal or written request during business hours [35 IAC 218.625].
- d. Clean Up [35 IAC 218.630]
- i. Paint or ink manufacturing equipment shall not be cleaned 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. Organic wash solvent shall not be stored 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.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected paint manufacturing operations are subject to the following:

- a. Emissions and operation of affected paint manufacturing operations shall not exceed the following limits:

VOM Emissions (ton/mo)	VOM Emissions (ton/yr)
8.03	64.23

The above limitations revise limitations originally established in Construction Permit 93110003. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21. These limits continue to ensure that the construction and/or modification addressed in these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in these construction permits and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the above emission limitations are based on the average actual

emissions from the coating production operation in 1992 and 1993 of 39.33 tons of VOM, as documented in this permit application, and the allowed increase in VOM emissions of 24.9 tons per contemporaneous period from 1994 to 1998 pursuant to 35 IAC Part 203, Major Stationary Sources Construction and Modification. The aerospace and automotive coatings are no longer segregated, and are manufactured in both the 1994 and 1973 production equipment.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the proceeding 11 months (running 12 month total) [T1R].

7.2.7 Testing Requirements

Upon request of the Illinois EPA or USEPA, the VOM emissions from an affected paint manufacturing line shall be determined in accordance with Reference Method 25 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105.

7.2.8 Monitoring Requirements

N/A

7.2.9 Recordkeeping Requirements

The Permittee shall maintain monthly and annual records of the following items for an affected paint manufacturing operation to demonstrate compliance with Conditions 5.5.1 and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Total production of fixed tank coatings in gal/mo and gal/yr.
- b. Total production of portable tank coatings in gal/mo and gal/yr.
- c. Number of tanks (tanks/mo) cleaned in the portable tank washing equipment.
- d. Number of tanks (tanks/mo) cleaned by hand.

- e. Total VOM emissions from the affected paint manufacturing operations based on the recordkeeping in Conditions 7.2.9(a), (b), (c), and (d) and the emission factors and formulas in Condition 7.2.12.
- f. Solid material handled (e.g. pigment), ton/mo and ton/yr.
- g. Total PM emissions calculated based on the compliance procedures in Condition 7.2.12 and recordkeeping in Condition 7.2.10(f).
- h. Sum of hours of operation per month for the paint manufacturing operations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected paint manufacturing operation 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 the affected paint manufacturing operation with the conditions of this section with a copy of such record for each incident.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.5.1 and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and the formulas listed below:

- a. Compliance with the particulate matter limitations in Condition 7.2.3 (e) is assured and achieved by the proper operation, maintenance and work-practices inherent in operation of an affected paint manufacturing operation and associated dust collectors.

b. Compliance with the emission limitations in Condition 7.2.3 (d) shall be based on the recordkeeping requirements in Condition 7.1.9 and by use of the formula listed below:

i. If no odor complaints are registered with the State or local authorities, photochemically reactive VOM emissions from the affected paint manufacturing operations (ton/mo)/sum of the hours of operation per month of each paint manufacturing operation that month/2000 lb/ton or in mathematical notation:

$$\text{VOM (lb/hr)} = \frac{\text{Total VOM Emissions (ton/mo)}}{\frac{\text{Hours of Operation (hr/mo)}}{2,000 \text{ lb/ton}}}$$

If odor complaints are registered with the State or local authorities, total VOM will be used in the above calculation for the period of time the complaint is registered.

c. Compliance with emission limitations in Conditions 5.5.1 and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of the formulas and emission factors listed below:

Portable Tank VOM Emissions

VOM emissions from portable tank manufacturing (ton/mo) = [(coating produced (gal/mo)) x (.0526 Lb VOM/gal coating)]/2000 Lb/gal

Fixed Tank VOM Emissions

VOM emissions from fixed tank manufacturing (ton/mo) = [(coating produced (gal/mo)) x (.0042 Lb VOM/gal coating)]/2000 Lb/ton

These are custom emission factors generated by the sources consultant that uses both engineering estimates and mass balance calculations.

FINAL DRAFT CAAPP PERMIT
Dexter Corporation
I.D. No.: 097190AAE
Application No.: 96030174
November 5, 1999

Portable Tank Washer VOM Emissions

VOM emissions from portable tank washer (ton/mo) =
[(Number of portable tanks cleaned (tanks/mo)) x
(2.731 Lb VOM/tank cleaned)]/2000 Lb/ton

Hand Tank Washing VOM Emissions

VOM emissions from hand cleaning (ton/mo) = [(Number
of portable tanks cleaned (tanks/mo)) x (1.24 Lb
VOM/tank cleaned)]/2000 Lb/ton

Tank and hand cleaning emission factors are generated
by the sources consultant during field observation
tests and are on file with the IEPA.

PM Emissions From Paint Manufacturing

Particulate emissions from paint manufacturing
(ton/mo) = [Solid Material handled (ton/mo)(.005*)(1-
control device efficiency(%))]

* PM Emissions are equal to 0.5% of weight of
solid material handled pursuant to Section
6.4, AP-42, Fifth Edition.

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 _____ **{insert public notice start date}** (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 without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and 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 [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. 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;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. 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

A report summarizing required monitoring 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]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
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:

FINAL DRAFT CAAPP PERMIT
Dexter Corporation
I.D. No.: 097190AAE
Application No.: 96030174
November 5, 1999

- 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

 - i. Illinois EPA - Air Regional Field Office

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

 - iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
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)(p)(ii) of the Act]:

- 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; 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.

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, reVOMation, 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 reVOMation 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].

FINAL DRAFT CAAPP PERMIT
Dexter Corporation
I.D. No.: 097190AAE
Application No.: 96030174
November 5, 1999

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 A Summary of Process Weight Rate
 35 IAC 212.321

Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:
 Emissions Equation

where:

P = Process weight rate; and
 E = Allowable emission rate; and,

a. Up to process weight rates of 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

b. For process weight rate greater than or equal to 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

c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972.

FINAL DRAFT CAAPP PERMIT
Dexter Corporation
I.D. No.: 097190AAE
Application No.: 96030174
November 5, 1999

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.15
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

FINAL DRAFT CAAPP PERMIT
Dexter Corporation
I.D. No.: 097190AAE
Application No.: 96030174
November 5, 1999

10.2 Attachment 2 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: _____

MJK:psj