

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Carbit Paint Company  
Attn: David Westerman  
927 West Blackhawk Street  
Chicago, Illinois 60622-2519

Application No.: 72100266

I.D. No.: 031600BGE

Applicant's Designation:

Date Received: June 5, 2008

Subject: Paint Manufacturing

Date Issued: November 27, 2012

Expiration Date: November 27, 2022

Location: 927 West Blackhawk Street, Chicago, Cook County 60622

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of twelve (12) paint dispersion mills and eleven (11) paint mixers controlled by dust collectors, one (1) 14 mmBtu/hour natural gas-fired boiler, product test spray booth, solvent recovery unit and two solvent storage tanks (one (1) 18,000 gallons and one (1) 14,000 gallons capacity) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing, 40 CFR 63, Subpart HHHHH.
  - iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.

- iv. To establish federally enforceable production and operating limitations, which restrict the potential to emit of VOM to less than 25 tons per year and paint production to less than 500,000 gallons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code 218 Subpart AA (Paint and Ink Manufacturing).
  - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
  - c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the emission source.
  - d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
3. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air.
- 4a. Pursuant to 35 Ill. Adm. Code 218.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere during the loading of any organic material

from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gallons/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with 35 Ill. Adm. Code 218.108.

- b. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
- c. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations which use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- d. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b)(1), (b)(2), or (b)(3). No owner or operator of a source that manufactures coatings, inks, adhesives, or resins shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in at least one of the following: 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5):
  - i. The VOM content of the as-used cleaning solutions does not exceed the following emissions limitations:

|  | <u>kg/l</u> | <u>lb/gal</u> |
|--|-------------|---------------|
| A. Cleaning of equipment used in the manufacture of coatings, inks, adhesives, or resins | 0.20        | 1.67          |

|  | <u>kg/l</u> | <u>lb/gal</u> |
|--|-------------|---------------|
| B. All other cleaning operations not subject to a specific limitation in 35 Ill. Adm. Code 218.187(b)(1)(A) through (b)(1)(C)  | 0.050       | 0.42          |
| ii. The composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);  |             |               |
| iii. For sources that manufacture coatings, inks, adhesives, or resins, the owner or operator complies with the following work practices:  |             |               |
| A. Equipment being cleaned is maintained leak-free;  |             |               |
| B. VOM-containing cleaning materials are drained from the cleaned equipment upon completion of cleaning;   |             |               |
| C. VOM-containing cleaning materials, including waste solvent, are not stored or disposed of in such a manner that will cause or allow evaporation into the atmosphere; and  |             |               |
| D. VOM-containing cleaning materials are stored in closed containers;  |             |               |
| iv. Sources that manufacture coatings, inks, adhesives, or resins may utilize solvents that do not comply with 35 Ill. Adm. Code 218.187(b)(1) or (b)(2) provided that all of the following requirements are met:  |             |               |
| A. No more than 228 l (60 gal) of fresh solvent is used per calendar month. Solvent that is reused or recycled, either onsite or offsite, for further use in equipment cleaning or in the manufacture of coatings, inks, adhesives, or resins, shall not be included in this limit;  |             |               |
| B. Solvents, including cleanup solvents, are collected and stored in closed containers; and  |             |               |
| C. Records are maintained in accordance with 35 Ill. Adm. Code 218.187(e)(6).  |             |               |
| e. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material. |             |               |
| 5a. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for   |             |               |

Miscellaneous Coating Manufacturing, 40 CFR 63, Subpart HHHHH. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Paints and Allied Products Manufacturing, 40 CFR 63 Subpart CCCCCC because the source does not process, use, or generate materials containing HAP, as defined in 40 CFR 63.11607.
- 6. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 7a. This permit is issued based on the storage tanks at this source not being subject to 35 Ill. Adm. Code 218.120, Control Requirements for Storage Containers for VOL. Pursuant to 35 Ill. Adm. Code 218.119(f), the limitations of 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL) shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gal) capacity or greater, except to vessels with storage capacity less than 40,000 gallons must comply with 35 Ill. Adm. Code 218.129(f).
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- c. This permit is issued based on the paint dispersion mills and paint mixers at this source not being subject to 35 Ill. Adm. Code 218 Subpart AA (Paint and Ink Manufacturing). Pursuant to 35 Ill. Adm. Code 218.620(b), 35 Ill. Adm. Code 218 Subpart AA shall also apply to all paint and ink manufacturing sources which:
  - i. Have the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate, from process emission units that are not regulated by 35 Ill. Adm. Code 218 Subparts B, E, F, H, Q, R, S, T (excluding 35 Ill. Adm. Code 218.486), V, X, Y, Z, or BB, or
  - ii. Produce more than 1,892,705 liters (500,000 gallons) per calendar year of paint or ink formulations which contain less than 10% (by

weight) water, and ink formulations not containing as the primary solvents water, Magie oil or glycol.

- 8a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with

35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.

- 9a. Pursuant to 35 Ill. Adm. Code 218.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 218.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.187(e).
- b. Pursuant to 35 Ill. Adm. Code 218.187(d), the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.187 shall comply with the following for each subject cleaning operation. Such requirements are in addition to work practices set forth in 35 Ill. Adm. Code 218.187(b)(4) and (b)(5), as applicable:
  - i. Cover open containers and properly cover and store applicators used to apply cleaning solvents;
  - ii. Minimize air circulation around the cleaning operation;
  - iii. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
  - iv. Utilize equipment practices that minimize emissions; and
  - v. When using cleaning solvent for wipe cleaning, sources that manufacture coatings, inks, adhesives, or resins shall:
    - A. Cover open containers used for the storage of spent or fresh organic compounds used for cleanup or coating, ink, adhesive, or resin removal; and
    - B. Cover open containers used for the storage or disposal of cloth or paper impregnated with organic compounds that are used for cleanup or coating, ink, adhesive, or resin removal.
- c. Pursuant to 35 Ill. Adm. Code 218.208(a), the limitations of 35 Ill. Adm. Code 218 Subpart F (Coating Operations) shall not apply to coating lines within a source, that otherwise would be subject to the same subsection of 35 Ill. Adm. Code 218.204 (because they belong to the same coating category, e.g., can coating), provided that combined actual emissions of VOM from all lines at the source subject to that subsection never exceed 6.8 kg/day [15 lbs/day] before the application of capture systems and control devices. (For example, can coating lines within a source would not be subject to the limitations of 35 Ill. Adm. Code 218.204(b) if the combined actual emissions of VOM from the can coating lines never exceed 6.8 kg/day (15 lbs/day) before the application of capture systems and control devices.) Prior to May 1, 2012, volatile organic material emissions from heavy off-highway vehicle products coating lines must be combined with VOM emissions from miscellaneous metal parts and products coating lines to determine

applicability. On and after May 1, 2012, VOM emissions from heavy off-highway vehicle products coating lines shall be combined with VOM emissions from miscellaneous metal parts and products coating lines and plastic parts and products coating lines to determine applicability. Any owner or operator of a coating source shall comply with the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(a) if total VOM emissions from the subject coating lines are always less than or equal to 6.8 kg/day (15 lbs/day) before the application of capture systems and control devices and, therefore, are not subject to the limitations of 35 Ill. Adm. Code 218.204. Once a category of coating lines at a source is subject to the limitations in 35 Ill. Adm. Code 218.204 the coating lines are always subject to the limitations in 35 Ill. Adm. Code 218.204.

- 10a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the dust collectors associated with the paint dispersion mills and paint mixers such that the dust collectors are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- c. The paint dispersion mills and paint mixers at this source shall not be operated with a material containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight, as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. The use of any a material containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight, as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material in the water based in production plant requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 11a. Raw materials usage and plant-wide VOM emissions from the paint manufacturing operations shall not exceed the following limits:

| VOM Usage    |             | Emission Factor<br>(Weight %) | VOM Emissions |             |
|--------------|-------------|-------------------------------|---------------|-------------|
| (Tons/Month) | (Tons/Year) |                               | (Tons/Month)  | (Tons/Year) |
| 80           | 600         | 3.4                           | 2.7           | 20.4        |

These limits are based on the maximum production rate and standard emission factor given by "Emission Inventory Improvement System (EIIP),

Volume II, Chapter 8: Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", February 2005.

- b. This permit is issued based on negligible emissions of particulate matter and volatile organic material from the product test spray booth. For this purpose emissions of each pollutant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- c. Emissions of volatile organic materials from the solvent recovery unit shall not exceed 0.2 lb/hour and 0.6 ton/year. These limits are based on the maximum process rate (4.4 lbs/hour and 12.0 tons/year) and determined as a difference between the amount of dirty solvent introduced in the unit and the amount of recovered solvent.
- d. This permit is issued based on negligible emissions of volatile organic material from two solvent storage tanks. For this purpose emissions from each tank shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- e. Operation and emissions of the boiler shall not exceed the following limits:
  - i. Natural Gas Usage: 2.5 mmscf/month, 20 mmscf/year
  - ii. Emissions from the combustion of natural gas:

| <u>Pollutant</u>                   | <u>Emission Factor</u><br><u>(lbs/mmscf)</u> | <u>Emissions</u><br><u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
|------------------------------------|--|--------------------------------------|------------------|
| Carbon Monoxide (CO)               | 84.0   | 0.11                                 | 0.84             |
| Nitrogen Oxides (NO <sub>x</sub> ) | 100.0  | 0.13                                 | 1.00             |
| Particulate Matter (PM)            | 7.6  | 0.01                                 | 0.08             |
| Sulfur Dioxide (SO <sub>2</sub> )  | 0.6  | 0.01                                 | 0.01             |
| Volatile Organic Material (VOM)    | 5.5  | 0.01                                 | 0.06             |

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

- f. Operations and particulate matter emission from pigment handling and mixing shall not exceed the following limits:

| <u>Pigment Usage</u> |                  | <u>Emission</u> | <u>Control</u>    | <u>PM Emissions</u> |                  |
|----------------------|------------------|-----------------|-------------------|---------------------|------------------|
| <u>(Tons/Mo)</u>     | <u>(Tons/Yr)</u> | <u>Factor</u>   | <u>Efficiency</u> | <u>(Tons/Mo)</u>    | <u>(Tons/Yr)</u> |
|                      |                  | <u>(Wt. %)</u>  | <u>(%)</u>        |                     |                  |
| 100                  | 800              | 1               | 90                | 0.1                 | 0.8              |

These limits are based on the maximum production rate and standard emission factors for pigment handling (Table 6.4-1, AP-42, Fifth Edition, Volume I, May 1983).

- g. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.24 tons/month and 22.38 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Miscellaneous Coating Manufacturing, 40 CFR 63 Subpart HHHHH.
  - h. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 12a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Conditions 13 and 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
13. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or

visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

- 14a. Pursuant to 35 Ill. Adm. Code 218.187(g)(1), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.187 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218.187. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during the testing;
  - b. Pursuant to 35 Ill. Adm. Code 218.187(g)(2), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.187(b)(1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:
    - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used, provided, however, Method 24 shall be used to demonstrate compliance; or
    - ii. The manufacturer's specifications for VOM content for cleaning solvents may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a), however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern.
  - c. Pursuant to 35 Ill. Adm. Code 218.187(g)(3), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
  - d. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 of this Part to establish the records required under 35 Ill. Adm. Code 218.211.
15. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential

to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

16. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 IAC Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 17a. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- b. Pursuant to 35 Ill. Adm. Code 218.182(d)(2), all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c)(2)(B) , (c)(2)(B), and (c)(3)(B) must maintain records which include for each purchase:
  - i. The name and address of the solvent supplier;
  - ii. The date of purchase;
  - iii. The type of solvent; and
  - iv. The vapor pressure of the solvent measured in mmHg at 20°C (68°F); and
  - v. For any mixture of solvents, the vapor pressure of the mixture, as used, measured in mmHg at 20°C (68°F).

- c. Pursuant to 35 Ill. Adm. Code 218.182(e), all records required by 35 Ill. Adm. Code 218.182(d) shall be retained for three years and shall be made available to the Illinois EPA upon request.
- d. Pursuant to 35 Ill. Adm. Code 218.187(e)(3), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(1) shall collect and record the following information for each cleaning solution used:
  - i. For each cleaning solution which is prepared at the source with automatic equipment:
    - A. The name and identification of each cleaning solution;
    - B. The VOM content of each cleaning solvent in the cleaning solution;
    - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
    - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
    - E. The VOM content of the as-used cleaning solution with supporting calculations; and
    - F. A calibration log for the automatic equipment, detailing periodic checks.
  - ii. For each batch of cleaning solution which is not prepared at the source with automatic equipment:
    - A. The name and identification of each cleaning solution;
    - B. Date, time of preparation, and each subsequent modification of the batch;
    - C. The VOM content of each cleaning solvent in the cleaning solution;
    - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
    - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results

of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a).

- e. Pursuant to 35 Ill. Adm. Code 218.187(e)(4), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(2) shall collect and record the following information for each cleaning solution used:
  - i. The name and identification of each cleaning solution;
  - ii. Date, time of preparation, and each subsequent modification of the batch;
  - iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
  - iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
  - v. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110.
- f. Pursuant to 35 Ill. Adm. Code 218.187(e)(6), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(5) shall collect and record monthly the following information for each cleaning operation subject to the requirements of 35 Ill. Adm. Code 218.187(b)(5):
  - i. The name, identification, and volume of each VOM-containing cleaning solution as applied in each cleaning operation;
  - ii. The volume of each fresh cleaning solvent used for cleaning coating, ink, adhesive, or resin manufacturing equipment;
  - iii. The volume of cleaning solvent recovered for either offsite or onsite reuse or recycling for further use in the cleaning of coating, ink, adhesive, or resin manufacturing equipment.
- g. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- h. Pursuant to 35 Ill. Adm. Code 218.211(b)(3), any owner or operator of a coating line that is exempted from the limitations of 35 Ill. Adm. Code 218.204 because of 35 Ill. Adm. Code 218.208(a) or (b) shall comply with the following: For sources exempt under 35 Ill. Adm. Code 218.208(a), on and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a coating line or group of coating

lines referenced in 35 Ill. Adm. Code 218.211(b) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

- i. The name and identification number of each coating as applied on each coating line; and
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
- 18a. The Permittee shall maintain monthly records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the dust collectors associated with the paint dispersion mills and paint mixers:
    - A. Records for periodic inspection of the dust collectors associated with the paint dispersion mills and paint mixers with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. Names and amount of solvents used (tons/month and tons/year);
  - iii. VOM and HAP content of the solvents (weight %);
  - iv. Amount of dirty solvent processed in solvent recovery unit and amount of recovered solvent (tons/month and tons/year);
  - v. Natural gas usage for the boiler (mmscf/month and mmscf/year); and
  - vi. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM, and HAPs from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

19. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 20a. Pursuant to 35 Ill. Adm. Code 218.182(d)(6), all persons subject to the requirements of 35 Ill. Adm. Code 218.182(b) or (c) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.182(b) or (c) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.
  - b. Pursuant to 35 Ill. Adm. Code 218.187(e)(2)(B), all sources subject to the requirements of 35 Ill. Adm. Code 218.187 shall at least 30 calendar days before changing the method of compliance between 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(4), or (b)(5) and 35 Ill. Adm. Code 218.187(b)(3), notify the Illinois EPA in writing of such change. Such notification shall include a demonstration of compliance with the newly applicable subsection;
  - c. Pursuant to 35 Ill. Adm. Code 218.187(e)(9), all sources subject to the requirements of 35 Ill. Adm. Code 218.187(b) and (d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.187(b) or (d) by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
  - d. Pursuant to 35 Ill. Adm. Code 218.211(b)(5), any owner or operator of a coating line that is exempted from the limitations of 35 Ill. Adm. Code 218.204 because of 35 Ill. Adm. Code 218.208(a) or (b) shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a coating line or group of coating lines exempted from the limitations of 35 Ill. Adm. Code 218.204 because of 35 Ill. Adm. Code 218.208(a) shall notify the Illinois EPA of any record showing that total VOM emissions from the coating line or group of coating lines exceed 6.8 kg (15 lbs) in any day before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.
  - e. Pursuant to 35 Ill. Adm. Code 218.637(a), upon request by the Illinois EPA, the owner or operator of an emission source which claims to be exempt from the requirements of 35 Ill. Adm. Code 218 Subpart AA shall submit records to the Illinois EPA within 30 calendar days from the date of the request which document that the emission source is in fact exempt from 35 Ill. Adm. Code 218 Subpart AA. These records shall include (but are not limited to) the percent water (by weight) in the paint or ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced.

21a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications shall be sent to:

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

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

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

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:VJB:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the paint manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is usage of 600 tons of solvents per year. The resulting maximum emissions are well below the levels, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less paint is produced and control measures are more effective than required in this permit.

| <u>Emission Unit</u>           | E M I S S I O N S (Tons/Year) |                       |             |                       |              |            | <u>Single<br/>HAP</u> | <u>Combined<br/>HAPs</u> |
|--------------------------------|-------------------------------|-----------------------|-------------|-----------------------|--------------|------------|-----------------------|--------------------------|
|                                | <u>CO</u>                     | <u>NO<sub>x</sub></u> | <u>PM</u>   | <u>SO<sub>2</sub></u> | <u>VOM</u>   |            |                       |                          |
| Paint<br>Manufacturing         |                               |                       |             |                       | 20.40        |            |                       |                          |
| Product Test Spray<br>Booth    |                               |                       | 0.44        |                       | 0.44         |            |                       |                          |
| Solvent Recovery<br>Unit       |                               |                       |             |                       | 0.60         |            |                       |                          |
| Storage Tanks                  |                               |                       |             |                       | 0.88         |            |                       |                          |
| Boiler                         | 0.84                          | 1.00                  | 0.08        | 0.01                  | 0.06         |            |                       |                          |
| Pigment Handling<br>and Mixing |                               |                       | 0.80        |                       |              |            |                       |                          |
| Totals                         | <u>0.84</u>                   | <u>1.00</u>           | <u>1.32</u> | <u>0.01</u>           | <u>22.38</u> | <u>9.0</u> | <u>22.38</u>          |                          |

VJB:psj