

217/782-2113

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

PERMITTEE

Venture Franklin Park, LLC
Attn: Tom Martin
600 North Dairy Ashford Road
Houston, TX 77079

<u>Application No.:</u> 73040175	<u>I.D. No.:</u> 031096AFC
<u>Applicant's Designation:</u>	<u>Date Received:</u> April 25, 2005
<u>Subject:</u> Bulk Oil Storage and Blending	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 9101 West Fullerton Avenue, Franklin Park, Cook County, 60131	

This Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of sixty-four (64) tanks (37 outside above-ground, 22 inside, and 5 blending kettles (86, 98, 99, MX-1, and MX-2)), two (2) loading/unloading systems, one (1) oil/water separator, and natural gas fuel combustion as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
- 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) and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirements 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 for VOM to less than 25 tons per year so that the source is not subject to the

requirements of 35 Ill. Adm. Code 218 Subpart AA (Paint and Ink Manufacturing) and 35 Ill. Adm. Code Part 218 Subpart QQ (Miscellaneous Formulation Manufacturing Process).

- 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. The ink blending operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Paints and Allied Products Manufacturing, 40 CFR 63 Subparts A and CCCCCC. The Illinois EPA is administering the NESHAP in Illinois on behalf of the USEPA under a delegation agreement.
- b. Pursuant to 40 CFR 63.11599(a), you are subject to 40 CFR 63 Subpart CCCCCC if you own or operate a facility that performs paints and allied products manufacturing that is an area source of hazardous air pollutant (HAP) emissions and processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607.
- c. Pursuant to 40 CFR 63.11600(a), if you own or operate an existing affected source, you must achieve compliance with the applicable provisions in 40 CFR 63 Subpart CCCCCC by December 3, 2012.
- d. Pursuant to 40 CFR 63.11601(a), for each new and existing affected source, you must comply with the requirements in 40 CFR 63.11601(a)(1) through (6). These requirements apply at all times.
 - i. You must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.
 - ii. You must capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form.
 - iii. You must:
 - A. Capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel; or

- B. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel only in paste, slurry, or liquid form.
- iv. You must:
 - A. Capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or
 - B. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form.
- v. You must:
 - A. Capture particulate emissions and route them to a particulate control device meeting the requirements of 40 CFR 63.11601(a)(6) during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel;
 - B. Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
 - C. Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
- vi. The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere.
- e. Pursuant to 40 CFR 63.11601(b), For each new and existing affected source, you must comply with the requirements in 40 CFR 63.11601(b)(1) through (5).
 - i. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the requirements of 40 CFR 63.11601(b)(1)(i) through (iii).
 - A. The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process.

- B. The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent.
 - C. The covers or lids must be maintained in good condition.
- ii. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft.
 - iii. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if:
 - A. All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and
 - B. No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel.
 - iv. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection.
 - v. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
 - b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute

period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- c. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 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 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 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.
- 5a. 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).
- b. This permit is issued based on the ink blending operation not being subject to 35 Ill. Adm. Code 218 Subpart AA (Paint and Ink Manufacturing). This is a result of the conditions in this permit which constrain maximum theoretical emissions to less than 100 tons per

year VOM, the potential to emit to less than 25 tons per year, and because the source produces paint or ink formulations which contain 10 percent or more (by weight) water or inks containing Magie oil and glycol as the primary solvent.

- c. This permit is issued based upon the operations of this plant not being subject to the requirements of VOM control in 35 Ill. Adm. Code 218, Subpart QQ (Miscellaneous Formulation Manufacturing Process). This is a result of the conditions in this permit which constrain maximum theoretical emissions to less than 100 tons per year VOM and potential to emit to less than 25 tons per year.
- 6a. Pursuant to 40 CFR 63.6(e)(1)(i), at all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in 40 CFR 63(e)(3)), review of operation and maintenance records, and inspection of the source.
- b. Pursuant to 40 CFR 63.6(e)(1)(ii), malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a startup, shutdown, or malfunction, an owner or operator must comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with safety and good air pollution control practices.
 - c. Pursuant to 40 CFR 63.6(e)(1)(iii), operation and maintenance requirements established pursuant to Section 112 of the Clean Air Act are enforceable independent of emissions limitations or other requirements in relevant standards.
7. In the event that the operation of these emission units result 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.

8a. Total throughputs for loading, mixing and storage and the maximum vapor pressure at the standard conditions of the materials used at this facility shall not exceed the following limits:

i. Throughput and material vapor pressure:

<u>Material</u>	<u>Vapor Pressure (psia)</u>	<u>Throughputs (Gallons/Month)</u>	<u>Throughputs (Gallons/Year)</u>
Oils and Solvents	0.04	2,000,000	24,000,000
Light Inkols	0.03	2,250,000	27,000,000
Medium Inkols	0.003	1,360,000	16,320,000
Heavy Inkols	0.003	1,250,000	15,000,000

ii. VOM emissions:

<u>Activity</u>	<u>Volatile Organic Material Emissions</u>	
	<u>(lb/Month)</u>	<u>(Tons/Year)</u>
Loading Operations	1,384	8.3
Mixing and Storing Operations	1,034	6.2
Other Fugitive Sources	84	0.5

This table defines the potential emissions based upon the maximum throughput and vapor pressure as limited in Condition 3 and the standard emission factors and formulas (Section 5.2.2.1.1, AP-42, Fifth Edition, Volume I, June 2008 for the loading losses and Section 7.1, AP-42, Fifth Edition, Volume I, November 2006 or TANKS Emissions Estimation Software, Version 4.09D, October 5, 2006 for breathing and working losses from the storage tanks).

b. Emissions and operation from natural gas combustion shall not exceed the following limits:

i. Natural Gas Usage: 7.5 mmscf/month, 75 mmscf/year.

ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor (Lbs/mmscf)</u>	<u>Emissions</u>	
		<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84.0	0.32	3.2
Nitrogen Oxides (NO _x)	100.0	0.38	3.8
Particulate Matter (PM)	7.6	0.03	0.3
Sulfur Dioxide (SO ₂)	0.6	0.01	0.03
Volatile Organic Material (VOM)	5.5	0.02	0.21

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

- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 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.
- d. 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).
- 9a. Pursuant to 40 CFR 63.6(f)(2)(i), the Illinois EPA or USEPA will determine compliance with nonopacity emission standards in 40 CFR Part 63 based on the results of performance tests conducted according to the procedures in 40 CFR 63.7, unless otherwise specified in an applicable subpart of 40 CFR Part 63.
- b. Pursuant to 40 CFR 63.6(f)(2)(ii), the Illinois EPA or USEPA will determine compliance with nonopacity emission standards in 40 CFR Part 63 by evaluation of an owner or operator's conformance with operation and maintenance requirements, including the evaluation of monitoring data, as specified in 40 CFR 63.6(e) and applicable subparts of 40 CFR Part 63.
- c. Pursuant to 40 CFR 63.6(f)(2)(iii), if an affected source conducts performance testing at startup to obtain an operating permit in the State in which the source is located, the results of such testing may be used to demonstrate compliance with a relevant standard if:
 - i. The performance test was conducted within a reasonable amount of time before an initial performance test is required to be conducted under the relevant standard;
 - ii. The performance test was conducted under representative operating conditions for the source;
 - iii. The performance test was conducted and the resulting data were reduced using EPA-approved test methods and procedures, as specified in 40 CFR 63.7(e); and
 - iv. The performance test was appropriately quality-assured, as specified in 40 CFR 63.7(c).
- d. Pursuant to 40 CFR 63.6(f)(2)(iv), the Illinois EPA or USEPA will determine compliance with design, equipment, work practice, or operational emission standards in 40 CFR Part 63 by review of records, inspection of the source, and other procedures specified in applicable subparts of 40 CFR Part 63.

- e. Pursuant to 40 CFR 63.6(f)(2)(v), the Illinois EPA or USEPA will determine compliance with design, equipment, work practice, or operational emission standards in 40 CFR Part 63 by evaluation of an owner or operator's conformance with operation and maintenance requirements, as specified in 40 CFR 63.6(e) and applicable subparts of 40 CFR Part 63.
- 10a. Pursuant to 40 CFR 63.7(a)(2), except as provided in 40 CFR 63.7(a)(4), if required to do performance testing by a relevant standard, and unless a waiver of performance testing is obtained under 40 CFR 63.7 or the conditions of 40 CFR 63.7(c)(3)(ii)(B) apply, the owner or operator of the affected source must perform such tests within 180 days of the compliance date for such source.
- b. Pursuant to 63.7(e)(1), performance tests shall be conducted under such conditions as the Illinois EPA or USEPA specifies to the owner or operator based on representative performance (i.e., performance based on normal operating conditions) of the affected source. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test, nor shall emissions in excess of the level of the relevant standard during periods of startup, shutdown, and malfunction be considered a violation of the relevant standard unless otherwise specified in the relevant standard or a determination of noncompliance is made under 40 CFR 63.6(e). Upon request, the owner or operator shall make available to the Illinois EPA or USEPA such records as may be necessary to determine the conditions of performance tests.
- c. Pursuant to 40 CFR 63.7(e)(2), performance tests shall be conducted and data shall be reduced in accordance with the test methods and procedures set forth in 40 CFR 63.7, in each relevant standard, and, if required, in applicable appendices of 40 CFR Parts 51, 60, 61, and 63 unless the Illinois EPA or USEPA:
 - i. Specifies or approves, in specific cases, the use of a test method with minor changes in methodology (see definition in 40 CFR 63.90(a)). Such changes may be approved in conjunction with approval of the site-specific test plan (see 40 CFR 63.7(c)); or
 - ii. Approves the use of an intermediate or major change or alternative to a test method (see definitions in 40 CFR 63.90(a)), the results of which the Illinois EPA or USEPA has determined to be adequate for indicating whether a specific affected source is in compliance; or
 - iii. Approves shorter sampling times or smaller sample volumes when necessitated by process variables or other factors; or
 - iv. Waives the requirement for performance tests because the owner or operator of an affected source has demonstrated by other means to the Illinois EPA's or USEPA's satisfaction that the affected source is in compliance with the relevant standard.

- d. Pursuant to 40 CFR 63.7(e)(3), unless otherwise specified in a relevant standard or test method, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the relevant standard. For the purpose of determining compliance with a relevant standard, the arithmetic mean of the results of the three runs shall apply. Upon receiving approval from the Illinois EPA or USEPA, results of a test run may be replaced with results of an additional test run in the event that:
 - i. A sample is accidentally lost after the testing team leaves the site; or
 - ii. Conditions occur in which one of the three runs must be discontinued because of forced shutdown; or
 - iii. Extreme meteorological conditions occur; or
 - iv. Other circumstances occur that are beyond the owner or operator's control.
- e. Pursuant to 40 CFR 63.7(e)(4), nothing in 40 CFR 63.7(e)(1) through (e)(3) shall be construed to abrogate the Illinois EPA's or USEPA's authority to require testing under Section 114 of the Clean Air Act.
- 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide,

without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

- b. Testing required by Condition 12 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
12. 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.
- 13a. Pursuant to 40 CFR 63.11602(a), for each new and existing affected source, you must demonstrate initial compliance by conducting the inspection and monitoring activities in 40 CFR 63.11602(a)(1) and ongoing compliance by conducting the inspection and testing activities in 40 CFR 63.11602(a)(2).
- b. Pursuant to 40 CFR 63.11602(a)(1), you must conduct an initial inspection of each particulate control device according to the requirements in 40 CFR 63.11602(a)(1)(i) through (iii) and perform a visible emissions test according to the requirements of 40 CFR 63.11602(a)(1)(iv). You must record the results of each inspection and test according to 40 CFR 63.11602(b) and perform corrective action where necessary. You must conduct each inspection no later than 180 days after your applicable compliance date for each control device which has been operated within 60 days following the compliance date. For a control device which has not been installed or operated within 60 days following the compliance date, you must conduct an initial inspection prior to startup of the control device.
 - i. For each wet particulate control system, you must verify the presence of water flow to the control equipment. You must also visually inspect the system ductwork and control equipment for leaks and inspect the interior of the control equipment (if applicable) for structural integrity and the condition of the control system.
 - ii. For each dry particulate control system, you must visually inspect the system ductwork and dry particulate control unit for leaks. You must also inspect the inside of each dry particulate control unit for structural integrity and condition.
 - iii. An initial inspection of the internal components of a wet or dry particulate control system is not required if there is a record that an inspection meeting the requirements of this subsection

has been performed within the past 12 months and any maintenance actions have been resolved.

- iv. For each particulate control device, you must conduct a visible emission test consisting of three 1-minute test runs using Method 203C (40 CFR Part 51, appendix M). The visible emission test runs must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If the average test results of the visible emissions test runs indicate an opacity greater than the applicable limitation in 40 CFR 63.11601(a), you must take corrective action and retest within 15 days.
- c. Pursuant to 40 CFR 63.11602(a)(2), following the initial inspections, you must perform periodic inspections of each PM control device according to the requirements in 40 CFR 63.11602(a)(2)(i) or (ii). You must record the results of each inspection according to 40 CFR 63.11602(b) and perform corrective action where necessary. You must also conduct tests according to the requirements in 40 CFR 63.11602(a)(2)(iii) and record the results according to 40 CFR 63.11602(b).
 - i. You must inspect and maintain each wet particulate control system according to the requirements in 40 CFR 63.11602(a)(2)(i)(A) through (C).
 - A. You must conduct a daily inspection to verify the presence of water flow to the wet particulate control system.
 - B. You must conduct weekly visual inspections of any flexible ductwork for leaks.
 - C. You must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the wet control system (if applicable) to determine the structural integrity and condition of the control equipment every 12 months.
 - ii. You must inspect and maintain each dry particulate control unit according to the requirements in 40 CFR 63.11602(a)(2)(ii)(A) and (B).
 - A. You must conduct weekly visual inspections of any flexible ductwork for leaks.
 - B. You must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.

- iii. For each particulate control device, you must conduct a 5- minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR Part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, you must conduct a Method 203C (40 CFR Part 51, Appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicates an opacity greater than the limitation in 40 CFR 63.11601(a)(4), you must comply with the requirements in 40 CFR 63.11602(a)(2)(iii)(A) through (C).
 - A. You must take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. You must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in 40 CFR 63.11601(a)(6).
 - B. You must prepare a deviation report in accordance with 40 CFR 63.11603(b)(3) for each instance in which the Method 203C opacity results were greater than the limitation in § 63.11601(a)(6).
 - C. You must resume the visible determinations of emissions from the particulate control device in accordance with 40 CFR 63.11602(a)(2)(iii) 3 months after the previous visible determination.
- 14a. Pursuant to 40 CFR 63.10(b)(1), the owner or operator of an affected source subject to the provisions of 40 CFR Part 63 shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

- b. 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.

- 15a. Pursuant to 40 CFR 63.11602(b), you must record the information specified in 40 CFR 63.11602(b)(1) through (6) for each inspection and testing activity.
 - i. The date, place, and time;
 - ii. Person conducting the activity;
 - iii. Technique or method used;
 - iv. Operating conditions during the activity;
 - v. Results; and
 - vi. Description of correction actions taken.

- b. Pursuant to 40 CFR 63.11603(c), you must maintain the records specified in 40 CFR 63.11603(c)(1) through (4) in accordance with 40 CFR 63.11603(c)(5) through (7), for five years after the date of each recorded action.

- i. As required in 40 CFR 63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted in accordance with 40 CFR 63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted.
 - ii. You must keep a copy of each Annual Compliance Certification Report prepared in accordance with 40 CFR 63.11603(b).
 - iii. You must keep records of all inspections and tests as required by 40 CFR 63.11602(b).
 - iv. Your records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).
 - v. As specified in 40 CFR 63.10(b)(1), you must keep each record for 5 years following the date of each recorded action.
 - vi. You must keep each record onsite for at least 2 years after the date of each recorded action according to 40 CFR 63.10(b)(1). You may keep the records offsite for the remaining 3 years.
16. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
17. 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.
- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Calculated representative vapor pressure of each type (solvent, inkols) of material stored, loaded and blended (psia);
 - ii. Throughputs of each material stored, loaded and blended (gallons/month and gallons/year);
 - iii. Natural gas usage (scf/month and scf/year); and
 - iv. Monthly and annual emissions of CO, NO_x, PM, SO₂, 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.
- 19a. Pursuant to 40 CFR 63.9(b)(2), the owner or operator of an affected source that has an initial startup before the effective date of a relevant standard under 40 CFR Part 63 shall notify the Illinois EPA or USEPA in writing that the source is subject to the relevant standard. The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:
- i. The name and address of the owner or operator;
 - ii. The address (i.e., physical location) of the affected source;
 - iii. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;
 - iv. A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and
 - v. A statement of whether the affected source is a major source or an area source.
- b. Pursuant to 40 CFR 63.9(d), an owner or operator of a new source that is subject to special compliance requirements as specified in 40 CFR 63.6(b)(3) and 40 CFR 63.6(b)(4) shall notify the Illinois EPA or USEPA of his/her compliance obligations not later than the notification dates established in 40 CFR 63.9(b) for new sources that are not subject to the special provisions.
- c. Pursuant to 40 CFR 63.10(d)(1), notwithstanding the requirements in this paragraph or 40 CFR 63.10(e), and except as provided in 40 CFR 63.16, the owner or operator of an affected source subject to reporting requirements under 40 CFR Part 63 shall submit reports to the Illinois EPA or USEPA in accordance with the reporting requirements in the relevant standard(s).
- 20a. Pursuant to 40 CFR 63.11603(a), You must submit the notifications identified in 40 CFR 63.11603(a)(1) and (2).

- i. Initial Notification of Applicability. If you own or operate an existing affected source, you must submit an initial notification of applicability required by 40 CFR 63.9(b)(2) no later than June 1, 2010. If you own or operate a new affected source, you must submit an initial notification of applicability required by 40 CFR 63.9(b)(2) no later than 180 days after initial start-up of the operations or June 1, 2010, whichever is later. The notification of applicability must include the information specified in 40 CFR 63.11603(a)(1)(i) through (iii).
 - A. The name and address of the owner or operator;
 - B. The address (i.e., physical location) of the affected source; and
 - C. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date.
 - ii. If you own or operate an existing affected source, you must submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h) of the General Provisions by June 3, 2013. If you own or operate a new affected source, you must submit a Notification of Compliance Status within 180 days after initial start-up, or by June 1, 2010, whichever is later. If you own or operate an affected source that becomes an affected source in accordance with 40 CFR 63.11599(b)(3) after the applicable compliance date in 40 CFR 63.11600 (a) or (b), you must submit a Notification of Compliance Status within 180 days of the date that you commence processing, using, or generating materials containing HAP, as defined in 40 CFR 63.11607. This Notification of Compliance Status must include the information specified in 40 CFR 63.11603(a)(2)(i) and (ii).
 - A. Your company's name and address;
 - B. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart CCCCCC.
- b. Pursuant to 40 CFR 63.11603(b), you must prepare an annual compliance certification report according to the requirements in 40 CFR 63.11603(b)(1) through (b)(3). This report does not need to be submitted unless a deviation from the requirements of 40 CFR 63 Subpart CCCCCC has occurred. When a deviation from the requirements of 40 CFR 63 Subpart CCCCCC has occurred, the annual compliance certification report must be submitted along with the deviation report.

- i. You must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in 40 CFR 63.11603(b)(1)(i) through (iii).
 - A. The first annual compliance certification report must cover the first annual reporting period which begins the day of the compliance date and ends on December 31.
 - B. Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.
 - C. Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.
 - ii. The annual compliance certification report must contain the information specified in 40 CFR 63.11603(b)(2)(i) through (iii).
 - A. Company name and address;
 - B. A statement in accordance with 40 CFR 63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart CCCCCC; and
 - C. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
 - iii. If a deviation has occurred during the reporting period, you must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by 40 CFR 63.11603(b)(1)(iii).
- c. Pursuant to 40 CFR 63.11603(e), if you no longer process, use, or generate materials containing HAP after December 3, 2009, you must submit a Notification in accordance with 40 CFR 63.11599(d), which must include the information specified in 40 CFR 63.11603(e)(1) and (2).
- i. Your company's name and address;

- ii. A statement by a responsible official indicating that the facility no longer processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607, and that there are no plans to process, use or generate such materials in the future. This statement should also include the date by which the company ceased using materials containing HAP, as defined in 40 CFR 63.11607, and the responsible official's name, title, phone number, e-mail address and signature.
- 21. 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.
- 22. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 23a. 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

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

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

Date Signed: _____

ECB:GMK:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from this storage and blending 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. The resulting maximum emissions are below the levels (e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for any combination of such HAP) at which this source would be considered a major source for purposes 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, lower vapor pressures 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)					Single	Total
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Loading Operations					8.30		
Mixing and Storing Operations					6.20		
Other Fugitive Sources					0.50		
Fuel Combustion	<u>3.2</u>	<u>3.8</u>	<u>0.3</u>	<u>0.03</u>	<u>0.21</u>	-----	-----
Totals	3.2	3.8	0.3	0.03	15.21	9.0	22.5

ECB:GMK:psj