

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Morton International, Inc.  
Attn: David Miklos - Environmental Manager  
2701 East 170th Street  
Lansing, Illinois 60438

<u>Application No.:</u> 96030188	<u>I.D. No.:</u> 031159AAQ
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 11, 1996
<u>Operation of:</u> Paint Manufacturing	
<u>Date Issued:</u> August 22, 2000	<u>Expiration Date</u> <sup>2</sup> : August 22, 2005
<u>Source Location:</u> 2701 and 3000 East 170th Street, Lansing, Cook County	
<u>Responsible Official:</u> Reginold Horne, Business Director, Automotive Coatings	

This permit is hereby granted to the above-designated Permittee to OPERATE a paint manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:YY:psj

cc: Illinois EPA, FOS, Region 1  
USEPA

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

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	10
5.0 OVERALL SOURCE CONDITIONS	11
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)	16
6.1 Description of ERMS	
6.2 Applicability	
6.3 Obligation to Hold Allotment Trading Units (ATUs)	
6.4 Market Transaction	
6.5 Emission Excursion Compensation	
6.6 Quantification of Seasonal VOM Emissions	
6.7 Annual Account Reporting	
6.8 Allotment of ATUs to the Source	
6.9 Recordkeeping for ERMS	
6.10 Federal Enforceability	
6.11 Exclusions from Further Reductions	
7.0 UNIT SPECIFIC CONDITIONS	22
7.1 Coating/intermediate and dispersion production, solvent	

clean up operation, bulk storage tanks, and water-based  
facility

7.2 Resin Production



1.0 SOURCE IDENTIFICATION

1.1 Source

Morton International, Inc.  
2701 and 3000 East 170th Street  
Lansing, Illinois 60438  
847/868-7258

I.D. No.: 031159AAQ  
Standard Industrial Classification: 2891, Paint Manufacturing

1.2 Owner/Parent Company

Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, Pennsylvania 19106-2399

1.3 Operator

Morton International, Inc.  
2701 East 170th Street  
Lansing, Illinois 60438

David Miklos - Environmental Manager  
708/868-7258

1.4 General Source Description

Morton International, Inc. is located at 2701 and 3000 East 170th Street, Lansing in Cook County. The source conducts operations for the manufacturing of paints for the automotive industry. Production is conducted on a batch basis. The materials used in the manufacturing of the paints generally include resin, organic solvent, and solid raw materials such as pigments. The operations at the plant are divided according to source categories and/or process operations. These operations are batchmaking, dispersion, resin manufacturing, storage tanks and solvent cleaning. Batchmaking is a process for the production of finished paint and intermediate coatings. Pigment dispersion involves the grinding (milling) of pigments from its aggregate state into dispersed particle sizes. The plant also manufactures its own resin, both for internal and external use.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
cm	Centimeter
CO	Carbon monoxide
°C	Degree Centigrade
°F	Degree Fahrenheit
ft <sup>3</sup>	cubic foot
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	Kilogram
kPa	Kilo Pascals
kW	Kilo Watt
l	Liter
lb	pound
m	meter
mcf	Million Cubic Feet
mmBtu	Million British thermal units
mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
Mg	Mega gram
PM	Particulate Matter
ppm	parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
psi	pounds per square inch
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
T	Tons
T1	Title I - identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - identifies Title I conditions that are being established in this permit

T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VHAP	Volatile hazardous air pollutant
VOC	Volatile Organic Compound
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
%	Percent
wt. %	Weight Percent
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

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

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

Seventy four storage tanks capacities ranging from 1,000 gallons to 10,000 gallons

Roll-On Gluing Operation for Labeling

One 3.09 mmBtu/hr natural gas fired boiler

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

PIAB vacuum system

One baking soda blaster

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

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

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

Coating operations (excluding powder, architectural and industrial maintenance coating) with aggregate VOM usage that never exceeds 15 lbs/day from all coating lines at

the source, including VOM from coating, dilutents, and cleaning materials [35 IAC 201.210(a)(13)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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

### 3.2 Compliance with Applicable Requirements

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

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

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

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that

organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coating/ Intermediate Production	Large Batchmaking  Small Batchmaking Filling Operation	Before 1970	Baghouse BH1 Baghouse BH3
Dispersion Production	Green Room East Green Room West	1993 pre-1970, 1989, 1992, 1994, 1999	Baghouse BH2
Solvent Clean Up Operation	Pot Washer, Bucket Washer, Walk-In Loading Station, Slop Collection Unit	1985, 1986, 1994	Thermal Oxidizer
Bulk Storage Tanks	Outdoor Tanks  Indoor Tanks	pre-1970, 1996 pre-1970, 1985, 1986, 1994, 1998	Thermal Oxidizer
Water-Base Facility	Water-Based Paint Manufacturing	1991, 1993, 1994, 1996, 2000	Baghouse BH4
Resin Production	Polyester and Acrylic Resin Production	1982, 1985, 1986, 1990, 1992, 1999	Condensers and Thermal Oxidizer
Alar Unit	Alar Filtering Unit	1992	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

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

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b.
  - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
  - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
  - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied

on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

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

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

## 5.5 Source-Wide Emission Limitations

### 5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	183.00
Sulfur Dioxide (SO <sub>2</sub> )	----
Particulate Matter (PM)	1.96
Nitrogen Oxides (NO <sub>x</sub> )	----
HAP, not included in VOM or PM	----
TOTAL	184.96

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is

readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

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

## 5.7 General Reporting Requirements

### 5.7.1 General Source-Wide Reporting Requirements

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

### 5.7.2 Annual Emissions Report

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

## 5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

## 5.9 General Compliance Procedures

### 5.9.1 General Procedures for Calculating Emissions

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

## 6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

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

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

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

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

### 6.2 Applicability

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

### 6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
  - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

### 6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

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

#### 6.5 Emission Excursion Compensation

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

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

#### 6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance

with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

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

#### 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
  - i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
  - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
  - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit

compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

#### 6.8 Allotment of ATUs to the Source

- a. i. The allotment of ATUs to this source is 210 ATUs per seasonal allotment period.
- ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 23.765 tons.
- iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
- iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period during issuance and, if not retired in this season, the next seasonal allotment period.
- v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period during the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

#### 6.9 Recordkeeping for ERMS

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

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

#### 6.10 Federal Enforceability

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

#### 6.11 Exclusions from Further Reductions

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

- iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

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

None

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

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Coating/intermediate and dispersion production, solvent clean up operation, bulk storage tanks, and water-based facility

7.1.1 Description

The Permittee is a manufacturer of industrial coatings (paint). The coatings are produced on a batch basis (large batchmaking and small batchmaking). The batchmaking operation involves the production of finished and intermediate coatings based on the size of the batch. The large batchmaking is batch sizes ranging from approximately 500 to 4000 gallons while the small batchmaking is batch sizes ranging from approximately 10 to 500 gallons. Liquid solvents and resins plus solid materials are charged to the mixing tanks in an order specific to the formula for each batch. The batchmaking process involves steps of material charging, mixing and dispensing. The dispersion production involves milling of pigment in a solvent and additives to achieve a desired mill consistency. Milling is conducted in closed head horizontal mills. Each mill is associated with a pair of tanks (premix and catch) allowing multiple passes to achieve desired particle size consistency. The water-based paint manufacturing plant manufactures water-based coatings or paints for the automotive industry.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Large Batchmaking Green Room East (3) 2000 gal mixing tanks (7) 1000 gal mixing tanks (3) 3000 gal mixing (base) tanks - tanks for intermediate coatings  Green Room West (3) 4000 gal mixing tanks (6) 2000 gal mixing tanks (6) 500 gal mixing tanks (1) 1600 gal mixing tank	#11-13 #14-20 B1, B2, B3 (A/K/A Tanks #41, 42, 43)  #21-23 #24-29 #31-36 #37	Baghouse BH1
Small Batchmaking  Small Paint Plant 68 mixers & associated portable pots	#50-116	Baghouse BH3

Homogenizer mixer		
Filling Operation		
9 paint filling stations equipped with: air mixers and hydraulic mixers	#1-9	None

Dispersion Production		
Green Room East 8 Mills (7-16 Gal) and Associated Mixing Tanks and Portable Pots	#1-8	
Green Room West 18 Mills and Associated Mixing Tanks Portable Pots Floor Mixers High-Speed Disperser Turbomill	#10-27	Baghouse BH2
Solvent Clean Up Operation		Thermal Oxidizer (TOC)
Renzman Washing Machine Potwasher Walk-In Load Station Paint Slop Collection Area Solvent Still	Bucketwasher #1	
Outdoor Tanks		
North Tank Farm 19 Bulk Storage Tanks	ST 1-3, 4, 6, 8, 9, 16-17, 19-22, 24-28, 39	TOC
6 Bulk Storage Tanks	ST 23, 23a, 50, 51, 52, 53	
Northeast Tank Farm 5 Product Storage Tanks	ST 32, 33, 55, 56, 78	TOC (78 Only)
1 Product Storage Tank	ST 37	
South Tank Farm 3 Bulk Storage Tanks (Clean Up Solvent) 2 Bulk Storage Tanks	ST 42, 43, 44  ST 45, 47	TOC
Indoor Tanks		
V Room 3 Product Storage Tanks 2 Product Storage Tanks 2 Product Storage Tanks 3 Intermediate Storage Tanks	ST 62, 63, 64 ST 65, 66 ST 73, 74 ST 70, 71, 72	None
Green Room East 8 Product Storage Tanks	ST 31, 34,	None

1 Raw Material Tank  1 Cleaning Solvent Tank  Green Room West 4 Product Storage Tanks	35, 36, 57, 58, 59, 60  ST 81 (RA86342 Hold Tank)  ST 61  ST 29, 30, 40, 41	None
Indoor Tanks  Building 3 Still Bottom Waste Tank Still Pre-Tank Potwasher Holding Tank Bucketwasher Holding Tank  Secondary Distillation System (Hydro-Tek)  (2) 250 Gal Pre-Storage Tanks	   ST 49 ST 44a ST 80 ST 79   ST 77a, 77b	TOC      TOC
Water-Base Facility  11 Process Tanks 15 Floor Mixers 2 Storage Tanks 4 Floor Mixers	WB T-1 To T-11  WB ST 1 & 2	Baghouse BH4
Resin Production  Alar Filter Unit & Associated Tanks - Filter Tank, Receiver Tank, and Recirculation Tank  Emulsifier System - Process and Feed Tanks	Alar Unit   Emulsifier	None   TOC

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected mixer" for the purpose of these unit specific conditions is any mixer used for production of paints (large or small batchmaking or water-based paint manufacturing) and dispersion. As of the "date issued" as shown on page 1 of this permit, the affected mixers are identified in Condition 7.1.2.

- b. An "affected grinding mill" for the purpose of these unit specific conditions is a grinding mill used for milling in the dispersion production process. As of the "date issued" as shown on page 1 of this permit, the affected grinding mills are identified in Condition 7.1.2.
- c. An "affected storage tank" for the purpose of these unit specific conditions is a storage tank used for bulk material and product storage. As of the "date issued" as shown on page 1 of this permit, the affected storage tanks are identified in Condition 7.1.2.
- d. An "affected filling station" for the purpose of these unit specific conditions is a filling line for product filling. As of the "date issued" as shown on page 1 of this permit, the affected filling stations are identified in Condition 7.1.2.
- e. An "affected ALAR filter unit" for the purpose of these unit-specific conditions is a filter unit with associated tanks. As of the "date issued" as shown on page 1 of this permit, the affected ALAR filter unit is identified in Condition 7.1.2.
- f. An "affected emulsifier system" for the purpose of these unit-specific conditions is a process tank with associated mixer that receives raw material from a feed tank and used to manufacture water-base emulsions used to produce automotive coatings. As of the "date issued" as shown on page 1 of this permit, the affected emulsifier system is identified in Condition 7.1.2.
- g. Each affected mixer, grinding mill, storage tank, filling station, ALAR filter unit, and emulsifier system are subject to the limits identified in Condition 5.2.2.
- h. Each affected mixer (except mixers in line with grinding mills used in dispersion production) and filling station at the source is subject to 35 IAC 212.322(a), which requires that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which

construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

- ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected mixers, grinding mills, filling stations and ALAR filter unit shall not exceed the allowable emission rates specified in the following equation

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

Where:

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

- 1. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534
C	0.0	0.0

- 2. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16
C	-18.4	-40.0

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.322].

- i. Each affected grinding mill, mixers used in dispersion production, and ALAR filter unit at the

source are subject to 35 IAC 212.321(a), which requires that:

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected grinding mills, mixers used in dispersion production, and ALAR filter unit shall not exceed the following emission rates specified in the following equation

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

Where:

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

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

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

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

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

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms  
or pounds per hour [35 IAC 212.321].

- j. Pursuant to 35 IAC 218.624, the Permittee shall not operate an affected open-top grinding mill and affected mixers with a volume of more than 45 liter (12 gal) for the production of paint unless:
  - i. The mill(s) and mixer(s) are equipped with a cover which completely covers the mill or mixer opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such covers shall extend at least 1.27 cm (0.5 inch) beyond the outer rim of the opening or be attached to the rim.
  - ii. The cover remains closed except when production, sampling, maintenance, or inspection procedures require access.
  - iii. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.
- k. Pursuant to 35 IAC 218.625, the affected grinding mills shall comply with the following:
  - i. The Permittee shall not operate a grinding mill for the production of paint which is not maintained in accordance with the manufacturer's specifications.
  - ii. The Permittee shall not operate a grinding mill which is not equipped with fully enclosed screens.
  - iii. The Permittee shall keep manufacturer's specifications for the grinding mills, and be made available upon request during business hours.
- l. Pursuant to 35 IAC 218.626, the storage tanks (even storage tanks considered to be insignificant based on their emissions) used in line with the paint production operation shall comply with the following:
  - i. The Permittee shall equip tanks storing VOL with a vapor pressure greater than 10 kPa (1.5 psi) at 20°C (68°F) with pressure/vacuum

conservation vents set as a minimum at  $\pm 0.2$  kPa (0.029 psi). These controls shall be operated at all times.

- ii. Stationary VOL storage containers with a capacity greater than 946 liter (250 gal) shall be equipped with a submerged-fill pipe or bottom fill. These controls shall be operated at all times.
- m. For the affected storage tanks, the Permittee shall maintain readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel [25 IAC 218.129 (f)].
- n. Pursuant to 35 IAC 218.628, the Permittee of a paint manufacturing source shall, for the purpose of detecting leaks, conduct an equipment monitoring program as set forth below:
  - i. Each pump shall be checked by visual inspection each calendar week for indications of leaks, that is, liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, the pump shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
  - ii. Any pump, valve, pressure relief valve, sampling connection, open-ended valve and flange or connector containing a fluid which is at least 10 percent VOM by weight which appears to be leaking on the basis of sight, smell, or sound shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.
  - iii. A weather proof, readily visible tag, in bright colors such as red or yellow, bearing an identification number and the date on which the leak was detected shall be attached to leaking equipment. The tag may be removed upon repair, that is, when the equipment is adjusted or otherwise altered to allow operation without leaking.
  - iv. When a leak is detected, the Permittee shall record the date of detection and repair and the record shall be retained at the source for at least two years from the date of each

detection or each repair attempt. The record shall be made available to any person upon verbal or written request during business hours.

- o. Pursuant to 35 IAC 218.630, the cleanup operation of the paint manufacturing equipment shall comply with the following:
  - i. The Permittee shall not clean paint manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.
  - ii. The Permittee shall not store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere.
- p. The affected mixers, grinding mills, filling stations, storage tanks, ALAR filter unit, and emulsifier at the source are subject to 35 IAC 218.301 which requires that:

The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.

#### 7.1.4 Non-Applicability of Regulations of Concern

None

#### 7.1.5 Operational and Production Limits and Work Practices

- a. The amount of coatings produced at the source shall not exceed the following limits:

	<u>(gal/mo)</u>	<u>(gal/yr)</u>
Large Batchmaking	590,000	5,900,000
Small Batchmaking	250,000	2,500,000

- b. The amount of dispersion production at the source shall not exceed the following limits:

	<u>(gal/mo)</u>	<u>(gal/yr)</u>
Dispersion Production	160,000	1,600,000

#### 7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the dispersion production operation are subject to the following:

- a. Emissions of VOM from the 26 mills (#1 thru #8 and #10 through #27) and their associated mixing tanks used in dispersion production shall not exceed the following limits:

VOM Emissions		
	<u>(T/mo)</u>	<u>(T/yr)</u>
All units combined	1.1	10.9
Each individual mill and it's associated mixing tanks	0.1	0.5

The above limitations in Conditions 7.1.6 (a) are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the 26 mills with associated mixers such that the addition of new equipment would not constitute a new major source or major modification over any 5 year contemporaneous time period [T1N].

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

- b. Emissions from the High Speed Dispenser shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.02	0.13

These limits are based on throughput and emissions information supplied by the source.

The above limitations contain revisions to previously issued Construction Permit 99020072. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits were reduced. [T1R].

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

- c. Emissions from the Bucketwasher #1 and Storage Tank ST-79 shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.92	9.2

These limits are based on throughput and emissions information supplied by the source.

The above limitations were established in Construction Permit 86120013, pursuant to 35 IAC Part

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

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

- d. Emissions from the ALAR filter unit and associated tanks shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.2	1.68

These limits are based on throughput and emissions information supplied by the source.

The above limitations contain revisions to previously issued Construction Permit 92070049. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours per year and pounds per hour limits were changed to tons per month. [T1R].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

- e. Emissions from the new Dispersion Mill #2 shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.25	2.5

These limits are based on throughput and emissions information supplied by the source.

The above limitations were established in Construction Permit 99060079, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

- f. Emissions from the Water-Base Plant shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.62	6.15

These limits are based on throughput and emissions information supplied by the source.

The above limitations contain revisions to previously issued Permits 90100097 and 96020036. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the

primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits were reduced [T1R].

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

- g. Emissions from the pot washer, walk-in load station, paint sloop collection area, and Storage Tank ST-80 shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.6	5.85

These limits are based on throughput and emissions information supplied by the source.

The above limitations contain revisions to previously issued Permit 93090022. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits were reduced [T1R].

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

- h. Emissions from the following emission units or groups of emission units are considered to have negligible emissions. This means that each group as listed is limited to 0.44 T/yr of VOM emissions.

Solvent Still and Storage Tank ST-44A  
Storage Tanks ST-77A, 77B, and 78  
(3) 50 horsepower and (2) 30 horsepower floor mixers  
Emulsifier

The above limitations contain revisions to previously issued Permits 85050035, 98070046, 93050081, 94080070, and 96120075. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits were reduced, and, for the solvent recovery still, other emission, throughput, hours of operation, and types of solvents limitations have been eliminated. [T1R].

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

#### 7.1.7 Testing Requirements

Testing for VOM emissions from the mixers and grinding mills shall be performed as follows [40 CFR 60, Appendix A, Method 24]

- a. Upon reasonable request by the Illinois EPA, the VOM emissions from the operation of the affected mixers and grinding mills (from representative mixer(s) and grinding mill(s) for typical production operation)

shall be determined according to USEPA Reference Methods 24 of 40 CFR 60 Appendix A.

- b. Upon reasonable request by the Illinois EPA, the VOM content of the cleanup solvents used shall be determined according to USEPA Reference Methods 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

#### 7.1.8 Monitoring Requirements

The Permittee shall conduct an equipment monitoring program for equipment used in the production of paints, as required by Condition 7.1.3(1).

#### 7.1.9 Recordkeeping Requirements

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

- a. Amount and type of coating(s) produced in gallons per month and gallons per year.
- b. Amount of dispersion production in gallons per month and gallons per year. Separate records should be maintained for 26 mills (#1 thru #8 and #10 through #27).
- c. VOM emissions from the coating and dispersion production (emissions from the 26 mills should be maintained separately) and cleanup operation. These should be calculated using procedures addressed in Condition 7.1.12.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of any affected unit listed in Condition 7.1.2 with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected tanks

without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the conditions of this permit.
- b. Use non-VOM containing cleaning solvents, such as acetone, in operating the bucketwasher and potwasher if the thermal oxidizer is shut down or for cleaning purposes in other equipment when needed, provided the equipment continues to comply with the conditions of this permit.
- c. Transfer a portion of solvent-based production into the water-based facility in the event of an unforeseen event in the solvent-based facility that would temporarily shut down solvent-based production, provided the equipment continues to comply with the conditions of this permit.

#### 7.1.12 Compliance Procedures

- a. Emissions of VOM from the Large and Small Batchmaking (e.g., charging, dispensing, mixing/heating, and cleaning) are based on engineering methods based on fundamental vapor/liquid equilibrium relationships, such as Raoult's law and/or Dalton's law, and assuming ideal gas behavior. The emissions shall be generated for each production sequence and then assigned to either Large or Small Batchmaking production. Cleaning emissions shall be calculated using engineering estimates based on vapor displacement and heating equations.
- b. Emissions of VOM from Dispersion Production (e.g., mixing/heating and cleaning) are based on engineering methods based on fundamental vapor/liquid equilibrium relationships, such as Raoult's law and/or Dalton's law, assuming ideal gas behavior, and accounting for batch recirculation. Cleaning emissions shall be calculated using engineering estimates based on vapor displacement and heating equations.
- c. Emissions of VOM from the Solvent Clean Up emission unit, shall be calculated based on emission factors on a per-batch basis derived from emission testing

data on the actual process equipment or similar equipment. Actual emission estimates are based on the emissions being controlled by a thermal oxidizer achieving an overall reduction in uncontrolled VOM emissions of at least 99.82 percent based on sampling data.

- d. Emissions of VOM from the Bulk Storage Tanks shall be based on the current version of the TANKS program.
- e. Emissions of VOM from the Water-Based Facility operations are based on fundamental vapor/liquid equilibrium relationships, such as Raoult's law and/or Dalton's law, and assuming ideal gas behavior. Cleaning emissions shall be calculated using engineering estimates based on vapor displacement, heating equations, and mass balance estimates.
- f. Compliance provisions addressing particulate matter limitations in this section are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the mixers and grinding mills.

## 7.2 Resin Production

### 7.2.1 Description

The reactor systems are used to manufacture acrylic resins and polyester resins. All reactors have condensers and their own holding tank. Each reactor is associated with an initiator tank and a monomer tank, except for reactor system (R3). The reactor, monomer, initiator and holding tanks are closed units with appropriate vents that discharge to condensers, scrubbers or receiving containers which ultimately are vented to the thermal oxidizer. Some vent lines which discharge into condensers have return lines where condensate is either collected in drums or returned into the reactors. Therefore, vapor emissions generated and released in the vent lines either condensate out and are collected or returned to reactors, or exit as vapor controlled by the thermal oxidizer.

### 7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Acrylic Resin Production Resin Reactor Systems R-2	R-2, MT-2, IT-2, HT-2	Condensers and Thermal oxidizer (TOC)
Acrylic Resin Production Resin Reactor Systems R-4	R-4, MT-4, IT-4, HT-4	Condensers and Thermal oxidizer (TOC)
Acrylic Resin Production Resin Reactor Systems R-6	R-6, MT-6, IT-6, HT-6	Condensers and Thermal oxidizer (TOC)
Polyester Resin Production Resin Reactor System R-3	R-3, HT-3	Condenser and Thermal oxidizer (TOC)
Acrylic or Polyester Resin Production Resin Reactor System R-5	R-5, MT-5, IT-5, HT-5	Condenser and Thermal oxidizer (TOC)

Note: Each resin reactor system has a reactor (R); reflux condenser; a holding tank (HT); and each system except #3 has a monomer tank (MT) and an initiator tank (IT)

### 7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected reactor system" for the purpose of these unit-specific conditions is any reactor and associated equipment used for the production of resins. As of the "date issued" as shown on page 1 of this permit, the affected reactor systems are identified in Condition 7.2.2.
- b. The affected reactor systems are subject to 35 IAC 218 Subpart G, Use of Organic Material, which provides that:
  - i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.2.3(b)(ii) (see also 35 IAC 218.302) and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 218.301].
  - ii. Emissions of organic material in excess of those permitted by Condition 7.2.3(b)(i) (see also 35 IAC 218.301) are allowable if such emissions are controlled by a thermal oxidizer that reduces at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere [35 IAC 218.302(b)].
- c. The affected reactor systems are subject to 35 IAC 218 Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes. Pursuant to 35 IAC 218.966(a), every owner or operator of a miscellaneous organic chemical manufacturing process emission unit subject to 35 IAC 218 Subpart RR shall employ emission capture and control techniques which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit.
- d. Each affected reactor system at the source is subject to 35 IAC 212.322(a), which requires that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which

construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

- ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected reactor system shall not exceed the allowable emission rates specified in the following equation

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

Where:

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

1. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534
C	0.0	0.0

2. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16
C	-18.4	-40.0

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.322].

#### 7.2.4 Non-Applicability of Regulations of Concern

- a. The affected reactor systems are not subject to the NESHAP for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, 40 CFR 63, Subpart F, because the source does not manufacture as a primary product one or more of the chemicals listed in table 1 of 40 CFR 63 Subpart F.
- b. The affected reactor systems are not subject to the requirements of 35 IAC 218 Subpart Q, Leaks from Synthetic Organic Chemical and Polymer Manufacturing Plants, pursuant to 35 IAC 218.421 because these components are not used to manufacture the synthetic organic chemicals or polymers listed in Appendix A of 35 IAC Part 218.

- c. The affected reactor systems used in the manufacturing of polyester resin are not subject to the requirements of 35 IAC 218 Subpart CC, Polyester Resin Product Manufacturing Process, because these reactor systems are not polyester resin products manufacturing processes as that term is defined in 35 IAC 211.4850.
- d. The affected reactor systems are not subject to the requirements of 35 IAC 218 Subpart V, Batch Operations, pursuant to 35 IAC 218.500 because this source does not have a standard industrial classification (SIC) code listed in 35 IAC 218.500(a)(1).

7.2.5 Operational and Production Limits and Work Practices

- a. For any leaks from components subject to the control requirements of 35 IAC 218 Subpart RR, the owner or operator shall repair any component from which a leak of VOL can be observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found, unless the leaking component cannot be repaired until the process unit is shut down, in which case the leaking component must be repaired before the unit is restarted [35 IAC 218.966(c)(1)].
- b. The Permittee shall follow good operating practices for the condensers, including periodic inspection, routine maintenance and prompt repair of defects.

7.2.6 Emission Limitations

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

- a. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Number of Batches (Batches/yr)</u>	<u>VOM Emissions (lb/mo)</u>	<u>(Ton/yr)</u>
Reactor System (R-2)	600	126	0.63
Reactor System (R-4)	584	116	0.58
Reactor System (R-6)	963	238	1.19

These limits are based on throughput and emissions information supplied by the source.

The above limitations contain revisions to previously issued Permits 82020073, 86100061, and 99020072. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits were reorganized [T1R].

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

- b. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Number of Batches (Batches/yr)</u>	<u>VOM Emissions (lb/mo)</u>	<u>(Ton/yr)</u>
Reactor System (R-3)	364	65	0.32

These limits are based on throughput and emissions information supplied by the source.

The above limitations contain revisions to previously issued Permit 85050053. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits

continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits were reduced [T1R].

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

- c. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Number of Batches (Batches/yr)</u>	<u>VOM Emissions</u>	
		<u>(lb/mo)</u>	<u>(Ton/yr)</u>
Reactor System (R-5)	427	64	0.32

These limits are based on throughput and emissions information supplied by the source.

The above limitations contain revisions to previously issued Permit 90090032. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits were reduced [T1R].

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

#### 7.2.7 Testing Requirements

Pursuant to 35 IAC 218.968(a), when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with Condition 7.2.3(c). The owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart RR shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105 and 218.112 as follows:

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

rates in accordance with the gas phase test methods specified in Condition 7.2.7(c) (see also 35 IAC 218.105(f)) [35 IAC 218.105(d)(1)].

- b. The overall efficiency of the emission control system shall be determined as the product of the capture system efficiency and the control device efficiency or by the liquid/liquid test protocol as specified in 40 CFR 60.433 for each solvent recovery system. In those cases in which the overall efficiency is being determined for an entire line, the capture efficiency used to calculate the product of the capture and control efficiency is the total capture efficiency over the entire line [35 IAC 218.105(e)(1)].
- c. Volatile Organic Material Gas Phase Source Test Methods: The methods in 40 CFR Part 60, Appendix A, delineated below shall be used to determine control device efficiencies:
  - i. 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 min, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times [35 IAC 218.105(e)(1)].
  - ii. CFR Part 60, Appendix A, Method 1 or 1A, shall be used for sample and velocity traverses [35 IAC 218.105(e)(2)];
  - iii. CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D, shall be used for velocity and volumetric flow rates [35 IAC 218.105(e)(3)];
  - iv. CFR Part 60, Appendix A, Method 3, shall be used for gas analysis [35 IAC 218.105(e)(4)];
  - v. CFR Part 60, Appendix A, Method 4, shall be used for stack gas moisture [35 IAC 218.105(e)(5)];
  - vi. CFR Part 60, Appendix A, Methods 2, 2A, 2C, 2D, 3 and 4, shall be performed, as

applicable, at least twice during each test run [35 IAC 218.105(e)(6)]; and

- vii. Use of an adaptation to any of the test methods specified in Conditions 7.2.7(c)(i), (ii) (iii), (iv), (v), and (vi) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) may not be used unless approved by the Illinois EPA and the USEPA on a case by case basis. An owner or operator must submit sufficient documentation for the Illinois EPA and the USEPA to find that the test methods specified in Conditions 7.2.7(c)(i), (ii) (iii), (iv), (v), and (vi) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) will yield inaccurate results and that the proposed adaptation is appropriate [35 IAC 218.105(e)(7)].

#### 7.2.8 Monitoring Requirements

Pursuant to 35 IAC 218.105(g), leak detection methods for volatile organic material owners or operators required by 35 IAC Part 218 to carry out a leak detection monitoring program shall comply with the following requirements:

- a. Leak Detection Monitoring:
  - i. Monitoring shall comply with 40 CFR 60, Appendix A, Method 21 [35 IAC 218.105(g)(1)(A)];
  - ii. The detection instrument shall meet the performance criteria of Method 21 [35 IAC 218.105(g)(1)(B)];
  - iii. The instrument shall be calibrated before use on each day of its use by the methods specified in Method 21 [35 IAC 218.105(g)(1)(C)];
  - iv. Calibration gases shall be:
    - A. Zero air (less than 10 ppm of hydrocarbon in air) [35 IAC 218.105(g)(1)(D)(i)]; and
    - B. A mixture of methane or n-hexane and air at a concentration of approximately, but no less than, 10,000 ppm methane or n-hexane [35 IAC 218.105(g)(1)(D)(ii)].

- v. The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21 [35 IAC 218.105(g)(1)(E)].
- b. Pursuant to 35 IAC 218.105(g)(2), when equipment is tested for compliance with no detectable emissions as required, the test shall comply with the following requirements:
  - i. The requirements of Conditions 7.2.8(a)(i) through (a)(v) (see also 35 IAC 218.105(g)(1)(A) through (g)(1)(E)) of this Section above shall apply [35 IAC 218.105(g)(2)(A)]; and
  - ii. The background level shall be determined as set forth in Method 21 [35 IAC 218.105(g)(2)(B)].
- c. Pursuant to 35 IAC 218.105(g)(3), leak detection tests shall be performed consistent with:
  - i. "APTI Course SI 417 controlling Volatile Organic Compound Emissions from Leaking Process Equipment", EPA-450/2-82-015 [35 IAC 218.105(g)(3)(A)];
  - ii. "Portable Instrument User's Manual for Monitoring VOC Sources", EPA-340/1-86-015 [35 IAC 218.105(g)(3)(B)];
  - iii. "Protocols for Generating Unit-Specific Emission Estimates for Equipment Leaks of VOC and VHAP", EPA-450/3-88-010 [35 IAC 218.105(g)(3)(C)]; and/or
  - iv. "Petroleum Refinery Enforcement Manual", EPA-340/1-80-008 [35 IAC 218.105(g)(3)(D)].

#### 7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected reactor systems to demonstrate compliance with Conditions 5.5.1, 7.2.3, 7.2.5, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of the efficiency of each capture system and control device pursuant to

Condition 7.2.7, which include the following [Section 39.5(7)(e) of the Act]:

- i. The date, place and time of sampling or measurements;
  - ii. The date(s) analyses were performed;
  - iii. The company or entity that performed the analyses;
  - iv. The analytical techniques or methods used;
  - v. The results of such analyses; and
  - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Records of the leak detecting monitoring pursuant to Condition 7.2.8, which include the following [Section 39.5(7)(e) of the Act]:
- i. The date, place and time of sampling or measurements;
  - ii. The date(s) analyses were performed;
  - iii. The company or entity that performed the analyses;
  - iv. The analytical techniques or methods used;
  - v. The results of such analyses; and
  - vi. The operating conditions as existing at the time of sampling or measurement.
- c. Pursuant to 35 IAC 218.991(a)(2), any owner or operator of a VOM emission unit which is subject to the requirements of 35 IAC 218 Subpart RR and complying by the use of emission capture and control equipment shall collect and record all of the following information each day and maintain the information at the source for a period of three years:
- i. Control device monitoring data [35 IAC 218.991(a)(2)(A)];
  - ii. A log of operating time for the capture system, control device, monitoring equipment

and the associated emission unit [35 IAC 218.991(a)(2)(B)]; and

- iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages [35 IAC 218.991(a)(2)(C)].
- d. Pursuant to 35 IAC 218.966(c)(2), For any leak which cannot be readily repaired within one hour after detection, the following records shall be kept. These records shall be maintained by the owner or operator for a minimum of two years after the date on which they are made. Copies of the records shall be made available to the Illinois EPA or USEPA upon verbal or written request.
  - i. The name and identification of the leaking component [35 IAC 218.966(c)(2)(A)];
  - ii. The date and time the leak is detected [35 IAC 218.966(c)(2)(B)];
  - iii. The action taken to repair the leak [35 IAC 218.966(c)(2)(C)]; and
  - iv. The date and time the leak is repaired [35 IAC 218.966(c)(2)(D)].
- e. Records addressing use of good operating practices for the thermal oxidizer:
  - i. Records for periodic inspection of the thermal oxidizer with date, individual performing the inspection, and nature of inspection; and
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- f. Types and quantities of products produced for each affected reactor system, lb/batch, lb/mo, and ton/yr;
- g. The number of batches begun in each affected reactor system; and
- h. The aggregate monthly and annual VOM emissions from the affected reactor system based on the material and

solvent usage and thermal oxidizer efficiency, with supporting calculations.

- i. Name and identification of each cleanup solvent used.

#### 7.2.10 Reporting Requirements

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

- a. The owner or operator of a subject VOM emission unit shall notify the Illinois EPA of any violation of the requirements of Condition 7.2.3(c) (see also 35 IAC 218 Subpart RR) by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.991(a)(3)(A)].
- b. Emissions of VOM in excess of the limits in Conditions 7.2.3(b) and/or 7.2.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.2.12 Compliance Procedures

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

- a. Emissions of VOM from Resin Production (e.g., monomer and initiator preparation, charging, cooking, holding, filling, and cleaning) are based on engineering methods based on fundamental vapor/liquid equilibrium relationships, such as Raoult's law and/or Dalton's law, and assuming ideal gas behavior. Cooking emissions shall use USEPA-approved methodology to modify heating equations. Cleaning emissions shall be calculated using vapor displacement and heating equations based on the above engineering methods and engineering estimates. Actual emission estimates are based on the emissions being controlled by a thermal oxidizer achieving an

overall reduction in VOM emissions of 99.82 percent based on sampling data.

- b. Compliance provisions addressing particulate matter limitations in this section are not set by this permit as compliance is assumed to be achieved by the normal work-practices and maintenance activities inherent in operation of the affected reactor systems.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after April 30, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA,

emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

## 8.5 Testing Procedures

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

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

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

Monitoring Period

Report Due Date

January - June

September 1

July - December

March 1

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

#### 8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion

of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

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

- i. Illinois EPA - Air Compliance Section

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

- ii. Illinois EPA - Air Regional Field Office

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

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

- Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section

P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

#### 9.2.2 Duty to Maintain Equipment

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

#### 9.2.3 Duty to Cease Operation

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

#### 9.2.4 Disposal Operations

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

#### 9.2.5 Duty to Pay Fees

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

### 9.3 Obligation to Allow Illinois EPA Surveillance

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

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

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

#### 9.4 Obligation to Comply With Other Requirements

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

#### 9.5 Liability

##### 9.5.1 Title

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

##### 9.5.2 Liability of Permittee

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

##### 9.5.3 Structural Stability

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

#### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

#### 9.5.5 Property Rights

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

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

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

#### 9.6.2 Records of Changes in Operation

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

#### 9.6.3 Retention of Records

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

### 9.7 Annual Emissions Report

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

#### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certifications shall include descriptions of means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

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

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain

compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

#### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

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

removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

## 9.12 Reopening and Reissuing Permit for Cause

### 9.12.1 Permit Actions

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

### 9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

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

#### 9.12.4 Duty to Provide Information

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

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Equipment

TABLE 1-1

Emission Unit	Description	Date Installed
<p>Large Batchmaking</p> <p>Green Room East            (3) 2000 Gal Mixing Tanks            (7) 1000 Gal Mixing Tanks            (3) 3000 Gal Mixing (Base) Tanks            - Tanks For Intermediate Coatings</p> <p>Green Room West            (3) 4000 Gal Mixing Tanks            (6) 2000 Gal Mixing Tanks            (6) 500 Gal Mixing Tanks            (1) 1600 Gal Mixing Tank</p>	<p>#11-13            #14-20            B1, B2, B3            (A/K/A Tanks #41, 42, 43)</p> <p>#21-23            #24-29            #31-36            #37</p>	<p>Pre-1970            Pre-1970            Pre-1970</p> <p>Pre-1970            Pre-1970            Pre-1970            Pre-1970</p>
<p>Small Batchmaking</p> <p>Small Paint Plant            68 Mixers &amp; Associated Portable Pots</p> <p>1 Homogenizer Mixer</p>	<p>#50-116</p>	<p>Pre-1970</p> <p>Not Available</p>
<p>Filling Operation</p> <p>9 Paint Filling Stations Equipped With Air Mixers and Hydraulic Mixers</p>	<p>#1-9</p>	<p>Pre-1970</p>
<p>Dispersion Production</p> <p>Green Room East            8 Mills (7-16 Gal) and Associated Mixing Tanks and Portable Pots</p>	<p>#1-8</p>	<p>April 1993</p>
<p>Green Room West            18 Mills and Associated Mixing Tanks and Portable Pots</p> <p>9 Floor Mixers</p>	<p>#10-27</p>	<p>#10 and #14 To #24, Sept. 1992            #11 To #13, Feb. 1994            #25 To #26 - 1989</p> <p>Pre-1970</p>

High-Speed Disperser Turbomill		1999
--------------------------------	--	------

Solvent Clean Up Operation		
Renzman Washing Machine	Bucketwasher #1	1986
Potwasher		1994
Walk-In Load Station		1994
Paint Slop Collection Area		1994
Solvent Still		1985
Outdoor Tanks		
North Tank Farm 19 Bulk Storage Tanks	ST 1-3, 4, 6, 8, 9, 16-17, 19-22, 24-28, 39	Pre-1970
6 Bulk Storage Tanks	ST 23, 23A, 50, 51 52, 53	Pre-1970
Northeast Tank Farm 5 Product Storage Tanks	ST 32, 33, 55, 56, 78	Pre-1970
1 Product Storage Tank	ST 37	1996
South Tank Farm 3 Bulk Storage Tanks (Clean Up Solvent)	ST 42, 43, 44	Pre-1970
2 Bulk Storage Tanks	ST 45, 47	Pre-1970
Indoor Tanks		
V Room 3 Product Storage Tanks	ST 62, 63 ,64	Pre-1970
2 Product Storage Tanks	ST 65, 66	Pre-1970
2 Product Storage Tanks	ST 73, 74	Pre-1970
3 Intermediate Storage Tanks	ST 71, 72, 73	
Green Room East 8 Product Storage Tanks	ST 31, 34, 35, 36, 57, 58, 59, 60	Pre-1970
1 Raw Material Tank	ST 81(RA86342 Hold Tank)	Not Available
1 Clean-Up Solvent Tank	ST 61	Pre-1970
Green Room West 4 Product Storage Tanks	ST 29, 30, 40, 41	Pre-1970
Building 3 Still Bottom Waste Tank	ST 49	Pre-1970

Still Pre-Tank	ST 44A	1985
Potwasher Holding Tank	ST 80	1994
Bucketwasher Holding Tank	ST 79	1986
Secondary Distillation System (Hydro-Tek) (2) 250 Gal Pre-Storage Tanks	ST 77A, 77B	1998
Water-Base Facility		
11 Process Tanks	WB T-1 To T-11	1991, 1996
15 Floor Mixers		1991, 1993
		1994
2 Storage Tanks	WB ST 1 & 2	1996
4 Floor Mixers		2000
Resin Production		
ALAR Filter Unit & Associated Tanks - Filter Tank, Receiver Tank, and Recirculation Tank	Alar Unit	1992
Emulsifier System	Emulsifier with Associated Tanks	1997
Acrylic Resin Production		
Resin Reactor Systems R-2, R-4, and R-6	R-2, MT-2, IT-2, HT-2	1989
	R-4, MT-4, IT-4, HT-4	1986
	R-6, MT-6, IT-6, HT-6	1999
Polyester Resin Production		
Resin Reactor System R-3	R-3, HT-3	1985
Acrylic Or Polyester Resin Production Resin Reactor System R-5	R-5, MT-5, IT-5, HT-5	1990

10.2 Attachment 2 Example Certification by a Responsible Official

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

Signature \_\_\_\_\_

Name \_\_\_\_\_

Official Title \_\_\_\_\_

Telephone No. \_\_\_\_\_

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

YY:psj

10.3 Attachment 3 - Preliminary Baseline Emissions Summary

Seasonal VOM emissions from units subject to further reduction, in TPS:

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>	<u>Notes</u>
Large Batchmaking	3.146	3.146	1
Small Batchmaking	0.569	0.569	1
Dispersions	4.087	4.087	1
Cleaning Operations		8.193	
Large Batchmaking	4.024	-----	1, 2
Small Batchmaking	12.606	-----	1, 2
Dispersions	20.118	-----	1, 2
Bucket Washer	17.690	-----	1, 2
Pot Washer	0.130	-----	1, 2
Walk-In Loading	0.050	-----	1, 2
Reactors 2, 3, 4, 5	6.425	6.425	1
Alar Drum Filter	0.080	0.080	1
Storage Tanks/Solvent Recovery Still	1.265	1.265	1
Paint Slop Collection Unit	-----	-----	3
Water-Based Facility (3000 E. 170th St.)	-----	-----	3
Total:	70.19	23.765	4

- Notes:
1. The revised emissions from these units were not substantiated, so the values from the July, 1998 submittal were used instead.
  2. 35 IAC 218.630 in effect requires that emissions to the atmosphere from cleaning operations be minimized. Therefore, credit for these operations is based on compliance to 35 IAC 218.302 (85% control).
  3. The seasonal emissions for these operations were not provided.
  4. The requested value of 138.6 tons/season was not accepted without justification for each unit's emissions. The July, 1998 submitted data was used instead.

The source shall maintain records of actual seasonal VOM emissions for all emission units not considered insignificant activities in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit starting with the 1998 seasonal allotment period of May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by November 30 of each year, pursuant to 35 IAC 205.300.

**TOTAL SOURCE ALLOTMENT = 0.88 x 23.765 = 20.9132 TPS**

**OR 210 ATU**

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATU=s equals 1 ton.

#### 10.4 Attachment 4 - Clarifications to Previous Permits

The Permittee has requested the following clarifications to conditions in previously issued construction and/or operating permits:

**Permit No. 82020073 (Resin Reactor 2): Condition 3(a)(iv).**

Morton requested that compliance with this condition be eliminated, as the information requested in this condition is not currently used to calculate VOM emissions to demonstrate compliance with permit limitations. Therefore, the records requested in this condition do not provide useful compliance information.

**Permit No. 85850053 (Resin Reactor 3): Condition 2.** Morton requests that compliance with this condition be eliminated as particulate emissions from this source are currently controlled by the PIAB vacuum system, which is listed as an insignificant emission source in Section 3.1.2 of the CAAPP permit. This control system was installed after the issuance of this permit.

**Permit No. 85850053 (Resin Reactor 3): Condition 3.** Morton requests that compliance with the pounds per batch and maximum hours of operation limitation be eliminated from this permit as the facility has already agreed upon emission limitations and recordkeeping, reporting, and compliance demonstration procedures for Resin Reactor 3 in the CAAPP permit.

**Permit No. 90090032 (Resin Reactor 5): Condition 1.** Morton requests that compliance with the 200 batches per year limitation be eliminated as this limitation has been superceded by the batches per year limitation in the CAAPP permit

**Permit No. 90020072 (Resin Reactor 6): Condition 1.12(b).** Morton requests that compliance with these conditions be eliminated as the information in subsections b and c are not used to calculate VOM emissions to demonstrate compliance with permit limitations.

**Permit No. 99020072 (High Speed Dispenser): Condition 1.9(c)(iii).** Morton requests that compliance with this condition be changed to recordkeeping of the quantity and VOM content of solvent disposal for all dispersion operations combined, not just for the High Speed Dispenser, as little cleaning of the Dispenser is required. The blade is the only part of the High Speed Dispenser cleaned outside of the bucket washer.

**Permit No. 99020072 (High Speed Dispenser): Condition 1.12(b) and (c).** Morton requests that compliance with these conditions be eliminated as the information in subsections (b) and (c) are not used to calculate VOM emissions to demonstrate compliance with permit limitations.

**Permit No. 99060079 (Dispersion Mill #2): Condition 1.6.** This condition contains typographic errors. "Mill #2" should be stated in place of "Reactor System and High Speed Dispenser."

**Permit No. 99060079 (Dispersion Mill #2): Condition 1.1.9(c)(iii).** Morton requests that compliance with this condition be changed to recordkeeping of the quantity and VOM content of solvent disposal for all dispersion operations combined, not just for the Dispersion Mill #2.

**Permit No. 99020079 (Dispersion Mill #2): Condition 1.1.2(b) and (c).** Morton requests that compliance with these conditions be eliminated as the information in subsections (b) and (c) are not used to calculate VOM emissions to demonstrate compliance with permit limitations.

**Permit No. 86120013 (Bucket Washer): Condition 2:** This condition no longer correctly reflects the design of the system, as the condenser was removed when the system was connected to the thermal oxidizer to control emissions.

**Permit No. 93090059 (Boilers): Condition 3.** Morton requests that compliance with the hours of operation limitations be eliminated as these limitations have been superceded by Sections 3.1.1 and 3.1.3 of the CAAPP permit, which correctly states that the boilers are considered to be insignificant activities.

10.5 Attachment 5 - NSR Netting Summary

Equipment	Date Constructed	VOM Emissions (Ton/Yr)	Five Year Aggregate
R-2	March, 1982	0.63	0.63
R-3	June, 1985	0.32	0.95
Solvent Still	August, 1985	0.44	1.39
R-4	December, 1986	0.58	1.97
Blanketwash	January, 1987	9.2	10.54
Mixers (25 and 26)	September, 1989	1.0	11.54
R-5	November, 1990	0.32	11.10
Water-Based Plant	January, 1991	6.15	16.67
ALAR	August, 1992	1.68	9.15
Mills 10, 14-24	September, 1992	6.0	15.15
Mills 1-8	April, 1993	4.0	19.05
Water-Based Plant	June, 1993	----	19.05
Mills 11-13	February, 1994	1.5	19.05
Water-Based Plant	October, 1994	----	19.05
Potwash, Walk-In, Paint Shop	October, 1994	5.85	24.9
Water-Based Plant	April, 1996	6.15	24.58
Emulsifier	January, 1997	0.44	17.94
Tanks 77A, 77B, and 78	August, 1998	0.44	14.38
R-6	March, 1999	1.19	8.22
HS Dispersions	March, 1999	0.13	8.35
Dispersion Mill 2	August, 1999	2.5	10.85

I. INTRODUCTION

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

Morton International, Inc. is located at 2701 and 3000 East 170th Street, Lansing in Cook County. The source conducts operations for the manufacturing of paints for the automotive industry. Production is conducted on a batch basis. The materials used in the manufacturing of the paints generally include resin, organic solvent, and solid raw materials such as pigments. The operations at the plant are divided according to source categories and/or process operations. These operations are batchmaking, dispersion, resin manufacturing, storage tanks and solvent cleaning. Batchmaking is a process for the production of finished paint and intermediate coatings. Pigment dispersion involves the grinding (milling) of pigments from its aggregate state into dispersed particle sizes. The plant also manufactures its own resin, both for internal and external use.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coating/ Intermediate Production	Large Batchmaking	Before 1970	Baghouses BH1 & BH2 Baghouse BH3 Baghouse BH3
	Small Batchmaking Filling Operation		
Dispersion Production	Green Room East Green Room West	1993 pre-1970, 1989, 1992, 1994, 1999	Baghouse BH2 Baghouse BH1
Solvent Clean Up Operation	Solvent Clean Up	1985, 1986, 1994	Thermal Oxidizer
Bulk Storage Tanks	Outdoor Tanks	pre-1970, 1996	Thermal Oxidizer
	Indoor Tanks	pre-1970, 1985, 1986, 1994, 1998	
Waterbase Facility	Waterbased Paint Manufacturing	1991, 1993, 1994, 1996, 2000	Baghouse BH4

Emission Unit	Description	Date Constructed	Emission Control Equipment
Resin Production	Polyester and Acrylic Resin Production	1982, 1985, 1986, 1990, 1992, 1999	Condensers and Thermal Oxidizer

### III. EMISSIONS

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

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	183.00
Sulfur Dioxide (SO <sub>2</sub> )	----
Particulate Matter (PM)	1.96
Nitrogen Oxides (NO <sub>x</sub> )	----
HAP, not included in VOM or PM	----
TOTAL	184.96

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

### IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

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

Title I

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

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998,

which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

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

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

YY:psj