

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Savogran Company
Attn: Mark Monique
259 Lenox Street
P.O. Box 130
Norwood, Massachusetts 02062-0130

Application No.: 98100066 I.D. No.: 043005AMN
Applicant's Designation: Date Received: September 15, 2003
Subject: Paint Remover Manufacturing Plant
Date Issued: December 4, 2003 Expiration Date: December 4, 2008
Location: 85 Industrial Road, Addison

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of six storage tanks, three mixing tanks and one product filling line pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- 2a. Operations and emissions from the paint remover production shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM (HAP)</u>	<u>Emission</u>	<u>VOM</u>		<u>HAP</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Content</u>	<u>Factor</u>	<u>Emissions</u>		<u>Emissions</u>	
			<u>(Lb/Gal)</u>	<u>(wt.%)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Methanol	30,000	290,000	6.6	0.5	0.5	4.8	0.5	4.8
Toluene	25,000	260,000	7.3	0.5	0.5	4.7	0.4	4.7
Mineral Spirit	3,000	30,000	6.5	0.5	0.05	0.5	--	--
Methylene Chloride	25,000	250,000	11.1	0.7	--	--	1.0	9.7
					Total:	10.0		19.2

- b. These limits define the potential VOM and HAP emissions and are based on the maximum production rate and standard emission factors.
- c. This permit is issued based upon no organic solvents are used for the cleanup operations.

- d. 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.
3. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
4. The Permittee shall keep records showing the dimension of the storage tank and an analysis showing the capacity of the storage tank with a design capacity greater than or equal to 40 m³ (10,000 gal) for the life of the source pursuant to 40 CFR 60.116b(b).
5. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device (35 Ill. Adm. Code 218.122(b)).
6. The Permittee shall maintain monthly records of the following items:
 - a. Names and amount of VOM and HAP-containing raw materials used (ton/mo; ton/yr);
 - b. VOM and HAP content in the raw materials (lb/gal or wt %);
 - c. VOM and HAP emission calculations (ton/mo; ton/yr); and
 - d. Separate emission records for each individual HAP with emission rate exceeding 0.8 ton/mo.
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit, as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.

9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:

Names and amount of VOM-containing raw materials used (tons/yr) and their VOM and HAP content (wt %) from the prior calendar year.

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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

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

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

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:jar

cc: IEPA, FOS Region 1
IEPA, Compliance and Enforcement Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Paint Remover Manufacturing Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is use of 830,000 gallons of VOM and HAP containing raw materials per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Material</u>	<u>VOM</u>	Emissions (Tons/Year)	<u>HAP</u>
Methanol	4.8		4.8
Toluene	4.7		4.7
Methylene Chloride	---		9.7
Mineral Spirit	<u>0.5</u>		<u>---</u>
Total:	10.0		19.2

DES:VJB:jar