

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Ace Hardware Paint Corporation
Attn: Mr. Harold Thomas
21901 South Central
Matteson, Illinois 60443

Application No.: 01100067

I.D. No.: 031818AAC

Applicant's Designation:

Date Received: October 17, 2001

Subject: Paint Manufacturing

Date Issued: December 7, 2006

Expiration Date: December 7, 2011

Location: 21901 South Central, Matteson

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 2 boilers, 5 air makeup units, 9 underground storage tanks with vapor system, 32 aboveground storage tanks, 5 dry bulk storage tanks with 1 dust collector, 1 solvent-based paint dispersing operation, 1 water-based paint dispersion operation, 1 pigment grinding operation, 1 PRI solvent distillation unit, 30 solvent-based paint mixing tanks, 22 water-based paint mixing tanks, 1 solvent-based paint filling operation, 6 use bins with bin top filters, and 1 water-based paint filling operation, a cold cleaning degreaser, and a recuperative thermal oxidizer with a roto concentrator to control VOM emissions from latex and oil-based paint manufacturing operations pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued:

- i. To limit the emissions of air pollutants from the plant for the purpose of the Clean Air Act Permit Program (CAAPP), to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source excluded from the requirement to obtain a CAAPP permit. The maximum emissions of the plants, as limited by the conditions of this permit are described in Attachment A.
- ii. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing, 40 CFR 63 Subpart HHHHH. This is consequence of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs, being established prior to the Compliance Date for existing sources listed in 40 CFR 63.7995(b).

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
- 2a. This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 Ill. Adm. Code Part 205, pursuant to 35 Ill. Adm. Code 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.
- b. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures that may be specified in this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
 - c. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in a Clean Air Act Permit Program (CAAPP) permit or a Federally Enforceable State Operating Permit (FESOP).
 - d. Pursuant to 35 Ill. Adm. Code 205.316(a), any participating or new participating source shall not operate without a CAAPP permit or FESOP. Pursuant to 35 Ill. Adm. Code 205.316(a)(2), if a participating or new participating source does not have a CAAPP permit containing ERMS provisions and the source elects to obtain a permit other than a CAAPP permit, the source shall apply for and obtain a FESOP that contains, in addition to other necessary provisions, federally enforceable ERMS provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for purposes of the ERMS, emissions

calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205.

- 3a. 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 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
- 4a.
 - i. Pursuant to 35 Ill. Adm. Code 218.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gallons/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes.
 - ii. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gallons), unless such tank is equipped with a permanent submerged loading pipe.
 - iii. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- b. Pursuant to 35 Ill. Adm. Code 218.182(a), no person shall operate a cold cleaning degreaser unless:
 - i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - ii. The cover of the degreaser is closed when parts are not being handled; and
 - iii. Parts are drained until dripping ceases.

- c. Pursuant to 35 Ill. Adm. Code 218.182(b), no person shall operate a cold cleaning degreaser unless:
 - i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powered system if:
 - A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);
 - B. The solvent is agitated; or
 - C. The solvent is heated above ambient room temperature.
 - ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
 - A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
 - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
 - iii. The degreaser is equipped with a freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less, if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point.
 - iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
 - v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
- d. Pursuant to 35 Ill. Adm. Code 218.182(c)(2)(B), on and after March 15, 2001, no person shall operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F).
- e. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.

- f. Pursuant to 35 Ill. Adm. Code 218.302(a), emissions of organic material in excess of those permitted by 35 Ill. Adm. Code 218.301 are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water
- g. The paint manufacturing operation is subject to and shall comply with the operating requirements of 35 Ill. Adm. Code 218, Subpart AA: Paint manufacturing for plants that manufacture more than 500,000 gallons per year of paint with less than 10 percent water.
- h. Pursuant to 35 Ill. Adm. Code 218.624, no person shall operate an open-top mill, tank, vat or vessel with a volume of more than 45 liters (12 gallons) for the production of paint or ink unless:
 - i. The mill, tank, vat or vessel is equipped with a cover which completely covers the mill, tank, vat or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft. Such cover shall extend at least 1.27 cm (0.5 in) beyond the outer rim of the opening or be attached to the rim.
 - ii. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.
 - iii. The cover is maintained in good condition such that, when in place, it maintains contact with the rim of the opening for at least 90 percent of the circumference of the rim.
- i. i. Pursuant to 35 Ill. Adm. Code 218.625(a), no person shall operate a grinding mill for the production of paint or ink which is not maintained in accordance with the manufacturer's specifications.
- ii. Pursuant to 35 Ill. Adm. Code 218.625(b), no person shall operate a grinding mill fabricated or modified after the effective date of this Subpart which is not equipped with fully enclosed screens.
- iii. Pursuant to 35 Ill. Adm. Code 218.625(c), the manufacturer's specifications shall be kept on file at the plant by the owner or operator of the grinding mill and be made available to any person upon verbal or written request during business hours.
- j. i. Pursuant to 35 Ill. Adm. Code 218.626(a), the owner or operator 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 ± 0.2 kPa (0.029 psi). These controls shall be operated at all times. An alternative air pollution control system may be used if it results in a greater emission reduction than these controls.

- ii. Pursuant to 35 Ill. Adm. Code 218.626(b), stationary VOL Storage containers with a capacity greater than 946 liters (250 gallons) shall be equipped with a submerged-full pipe or bottom fill. These controls shall be operated at all times.
- k. Pursuant to 35 Ill. Adm. Code 218.628, the owner or operator of a paint or ink 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 owner or operator shall record the date of detection and repair and the record shall be retained at the source for at least two years from the date of each detection or each repair attempt. The record shall be made available to any person upon verbal or written request during business hours.
- l.
 - i. Pursuant to 35 Ill. Adm. Code 218.630(a), no person shall clean paint or ink manufacturing equipment with organic solvent unless the equipment being cleaned is completely covered or enclosed except for an opening no larger than necessary to allow safe clearance for proper operation of the cleaning equipment, considering the method and materials being used.
 - ii. Pursuant to 35 Ill. Adm. Code 218.630(b), no person shall store organic wash solvent in other than closed containers, unless closed containers are demonstrated to be a safety hazard, or dispose of organic wash solvent in a manner such that more than 20 percent by weight is allowed to evaporate into the atmosphere.

5. The oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation.
- 6a. Usage and emissions of VOM from the cold cleaning machine shall not exceed 0.1 tons/month and 1.0 tons/year.
- b. Emissions and operation of all equipment, including all clean-up, shall not exceed the following limit:

<u>(Tons/Month)</u>	VOM Emissions	<u>(Tons/Year)</u>
4.15		24.9

The above limitations were established in Permit 04030049, pursuant to 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

- c. The following equation shall be used to calculate total VOM emissions from the facility:

$$E = [9,040X_1 + 20,100X_2 + 1,761Y_1 + 2,778Y_2 + Z_1 + 0.45(2/3)Z_2 + (1/3)Z_2] / 2,000$$

Where:

- E = Total VOM emissions from the facility (tons/month or tons/year);
- X₁ = Millions of gallons of oil-based paints produced during oxidizer operation(gallons/month or gallons/year);
- X₂ = Millions of gallons of oil-based paints produced during oxidizer downtime(gallons/month or gallons/year);
- Y₁ = Millions of gallons of latex paints produced during oxidizer operation(gallons/month or gallons/year);
- Y₂ = Millions of gallons of latex paints produced during oxidizer downtime(gallons/month or gallons/year);
- Z₁ = Pounds of clean-up solvents not used for oil-based, without oxidizer(lbs/month or lbs/year); and
- Z₂ = Pounds of clean-up solvents not used for oil-based, with oxidizer(lbs/month or lbs/year).

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

	Solvent Throughput		Volatile Organic Material Emissions	
	(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
Distillation Unit	45.93	551.2	0.46	5.51

These limits are based on the one percent of solvent throughput is released into atmosphere. The above limitations were established in Permit 93090029, pursuant to 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

- e. This permit is issued based on negligible emissions of VOM from the 9 underground storage tanks with vapor system and 32 aboveground storage tanks. For this purpose emissions from each emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- f. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP).
- g. The following equation shall be used to calculate HAP emissions from the facility:

$$E = \frac{[9,040X_1 (A_1 / A_2) + 20,100X_2(A_3 / A_4) + 2 / 3(20\%) (3.4\% B_1) 45\% + 1 / 3(20\%) 3.4\%B_1 + (20\%) 3.4\%B_2 + 2 / 3 (C_2) 45\% + 1 / 3C_2 + C_1 + C_3]}{2,000}$$

Where:

- E = Single HAP emissions from the facility (tons/month or tons/year);
- A₁ = Each Single HAP used for Oil-based & Clean-up, with Oxidizer, Excluding Methylene Chloride (lbs/month or lbs/year);
- A₂ = VOM used for Oil-based & Clean-up, with Oxidizer (lbs/month or lbs/year);
- A₃ = Each Single HAP used for Oil-based & Clean-up, without Oxidizer, Excluding Methylene Chloride (lbs/month or lbs/year);

- A₄ = VOM used for Oil-based & Clean-up, without Oxidizer (lbs/month or lbs/year);
- B₁ = Each Single HAP used for Latex, with Oxidizer, Excluding Methylene Chloride (lbs/month or lbs/year);
- B₂ = Each Single HAP used for Latex, without Oxidizer (lbs/month or lbs/year);
- C₁ = Each Single HAP used for NON-Oil-based Clean-up, without Oxidizer (lbs/month or lbs/year);
- C₂ = Each Single HAP used for NON-Oil-based Clean-up, with Oxidizer (lbs/month or lbs/year); and
- C₃ = Methylene Chloride Usage (lbs/month or lbs/year).

h. The above limits are based on the following:

- i. An overall control efficiency of 55% for the Rotor Concentrator/Thermal Oxidizer, uncontrolled emission rate and process weight rate from 2005 stack test results using oil-based paints.
- ii. VOM content averaging less than 5% by weight for latex paints.
- iii. 80% reduction in latex emissions due to average vapor pressure for the VOC components of latex paints of approximately 0.1 psi.
- iv. 3.4% of VOM in latex paint emitted based on Emission Inventory Improvement Program (EIIP), Vol. II, Ch. 8: Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities.
- v. Approximately 2/3 of latex paint VOM emissions controlled by the Rotor Concentrator/Thermal Oxidizer.
- vi. The amount of VOMs processed in the 4,939,116 gallons of latex paints produced in 2003 totaling 2,016,000 pounds.
- vii. Excluding Methylene Chloride, there is a nested limit on emissions of total HAPs as a result of the limit on VOM emissions. The HAPs emitted at this source have been determined to be VOMs and therefore limiting VOM emissions also limits HAP emissions.

7. Emissions of carbon monoxide and nitrogen oxides from the hot water boiler and the air makeup unit shall not exceed 0.3 and 2.0 tons/year, respectively. These limits are based on standard emission factors, firing of natural gas at the maximum firing rate, and the maximum hours of operation.

- b. This permit is issued based upon the minimal hourly emission rate from the steam boiler, and negligible annual emissions (less than 0.1 ton/year) of nitrogen oxides.
- 8a. Emissions of particulate matter from the dry bulk storage tanks and dust collector shall not exceed 0.9 tons/year. This limit is based on the maximum emission rate (0.2 lb/hour) and 8,736 hours of operation per year.
- b. Emissions of particulate matter from the used bin dust collectors and the silo top dust collectors shall not exceed 3.5 tons/year. This limit is based on the maximum emission rate (0.2 lb/hour each) and 8,736 hours of operation per year.
- 9. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 10a. Pursuant to 35 Ill. Adm. Code 212.107, 212.109, and 212.110, testing for particulate matter emissions shall be performed as follows:
 - i. For both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, incorporated by reference in 35 Ill. Adm. Code 212.113, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301.
 - ii. Except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, incorporated by reference in 35 Ill. Adm. Code 212.113, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
 - iii. Measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E.

- iv. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
 - v. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- b. Testing required by Condition 10(a) shall be performed by a qualified independent testing service.
- 11a. Pursuant to 35 Ill. Adm. Code 218.105(d) (2) (A), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner or carbon adsorber is in use except as provided in 35 Ill. Adm. Code 218.105(d) (3).
- i. For each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
 - ii. For each carbon adsorber, the VOM concentration of each carbon adsorption bed exhaust or the exhaust of the bed next in sequence to be desorbed.
- b. Pursuant to 35 Ill. Adm. Code 218.105(d) (2) (B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or $\pm 0.5^{\circ}\text{C}$, whichever is greater.
- c. Pursuant to 35 Ill. Adm. Code 218.628, the owner or operator of a paint or ink 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.
- 12a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- b. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
 - c. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no

provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.

- d. Pursuant to 35 Ill. Adm. Code 218.182(d)(2), on and after March 15, 1999, all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c)(1)(B) and (c)(2)(B) must maintain records which include for each purchase:
 - i. The name and address of the solvent supplier;
 - ii. The date of purchase;
 - iii. The type of solvent; and
 - iv. The vapor pressure of the solvent measured in mmHg at 20°C (68°F).
- e. Pursuant to 35 Ill. Adm. Code 218.637(b), every owner or operator of a source which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart AA shall maintain all records necessary to demonstrate compliance with those requirements at the source for three years.
- f. The Permittee shall maintain records of the following so as to demonstrate compliance with the conditions of this permit:
 - i. The Permittee shall collect and record the following information each day for the recuperative thermal oxidizer with a rotor concentrator:
 - A. Oxidizer combustion chamber monitoring data.
 - B. A log of operating time for the capture system, rotor concentrator, oxidizer, monitoring devices, and the associated emission unit(s).
 - C. A maintenance log for the capture system, rotor concentrator, oxidizer, and monitoring devices detailing all routine and non-routine maintenance performed including dates and duration of any outages.
 - D. Rotor concentrator and oxidizer monitoring device records, with documentation of all 3-hour periods (during actual manufacturing operations) during which the average combustion temperature of the oxidizer was more than 28°C (50°F) below the average combustion temperature during the most recent performance test that demonstrated compliance.
 - ii. Records addressing use of good operating practices of the rotor concentrator and thermal oxidizer including:

- A. Records of periodic inspection along with the date of inspection, individual performing the inspection and nature of inspection; and
 - B. Records detailing the deficiencies that occur including description, duration, effect on emissions, date repaired and repair description of the deficiencies.
- iii. Cold cleaning solvent usage (gallons or lbs/month and gallons or lbs/year);
 - iv. VOM and HAP content of the cold cleaning solvent (lbs/gallon or weight %);
 - v. Volume of oil-based paints produced during oxidizer operation (gallons/month and gallons/year);
 - vi. Volume of oil-based paints produced during oxidizer downtime (gallons/month and gallons/year);
 - vii. Volume of latex paints produced during oxidizer operation (gallons/month and gallons/year);
 - viii. Volume of latex paints produced during oxidizer downtime (gallons/month and gallons/year);
 - ix. Weight of clean-up solvents not used for oil-based, without oxidizer (lbs/month and lbs/year);
 - x. Weight of clean-up solvents not used for oil-based, with oxidizer (lbs/month and lbs/year);
 - xi. Identification and quantities of each single HAP used for Oil-based & Clean-up, with Oxidizer, excluding methylene chloride (lbs/month and lbs/year);
 - xii. Identification and quantities of each single HAP used for Oil-based & Clean-up, without Oxidizer, excluding methylene chloride (lbs/month and lbs/year);
 - xiii. Identification and quantities of each single HAP used for Latex, with Oxidizer, excluding methylene chloride (lbs/month and lbs/year);
 - xiv. Identification and quantities of each single HAP used for Latex, without Oxidizer, excluding methylene chloride (lbs/month and lbs/year);
 - xv. Identification and quantities of each single HAP used for Non-Oil-based Clean-up, without Oxidizer, excluding methylene chloride (lbs/month and lbs/year);

- xvi. Identification and quantities of each single HAP used for Non-Oil-based Clean-up, with Oxidizer, excluding methylene chloride (lbs/month and lbs/year);
 - xvii. Methylene chloride Usage (lbs/month and lbs/year);
 - xviii. Amount of solvent throughput for the distillation unit (tons/month and tons/year);
 - xix. Identification of and quantities of throughput for the materials stored in the 9 underground storage tanks with vapor system and 32 aboveground storage tanks (gallons/month and gallons/year);
 - xx. Amount of natural gas combusted at the source (mmscf/month and mmscf/year);
 - xxi. Pigment usage and bulk dry material throughput of the source (tons/month and tons/year); and
 - xxii. Monthly and annual emissions of CO, NO_x, PM, PM₁₀, SO₂, VOM and HAPs with supporting calculations (tons/month and tons/year).
- g. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 13a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- b. Pursuant to 35 Ill. Adm. Code 218.637(a), upon request by the Illinois EPA, the owner or operator of an emission source which claims to be exempt from the requirements of 35 Ill. Adm. Code 218 Subpart AA shall submit records to the Illinois EPA within 30 calendar days from the date of the request which document that the emission source is in fact exempt from 35 Ill. Adm. Code 218 Subpart AA. These records shall include (but are not limited to) the percent water (by weight) in the paint or ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced.
- c. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance

Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.

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

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

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

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

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

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

ECB:RBS:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from paint manufacturing operation 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 handling 3,300,000 gallons of oil-based paint, and 6,000,000 gallons of latex paint. The resulting maximum emissions are below the levels (e.g., less than 100 tons/year of volatile organic material (VOM), 25 tons/year of combined HAPs, and 10 tons/year of each single HAP), at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)					Single <u>HAP</u>	Total <u>HAPs</u>
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>		
Cold Cleaning Machine	-----	-----	-----	-----	1.00		
Latex and Oil- Based Paint Manufacturing Operations	-----	-----	-----	-----	24.90	< 10	< 25
Distillation Unit	-----	-----	-----	-----	5.51		
9 Underground Storage Tanks with Vapor System	-----	-----	-----	-----	3.96		
32 Aboveground Storage Tanks	-----	-----	-----	-----	14.08		
Hot Water Boiler and the Air Makeup Unit	0.3	2.0	-----	-----	-----		
Steam Boiler	-----	0.1	-----	-----	-----		
Dry Bulk Storage Tanks and Dust Collector	-----	-----	0.90	-----	-----		
Bin Dust Collectors and the Silo Top Dust Collectors	-----	-----	3.50	-----	-----		
Totals	<u>0.3</u>	<u>2.1</u>	<u>4.40</u>	-----	<u>49.45</u>	<u>< 10</u>	<u>< 25</u>