



b. Particulate Matter Emissions:

<u>Product</u>	<u>Powder Usage</u>		<u>Emission</u>	<u>PM Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>Factor</u> <u>(Lb/Ton)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Paste Wax	85	850	20	0.9	8.5
Liquid Polish	200	2,000	20	2.0	20.0

These limits define the potential emissions and are based on the maximum production rate and standard emission factors. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus preceding 11 months.

4. This permit is issued based on negligible emissions of volatile organic materials (VOM) from ten storage tanks. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
5. The emissions of hazardous air pollutants (HAPs) 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 HAPs from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
6. The Permittee shall maintain records of the following items:
  - a. Paste wax and liquid polish production (tons/month, tons/year);
  - b. Powder usage (tons/month, tons/year);
  - c. The name and identification number of each solvent and its VOM and HAP content; and
  - d. Monthly and annual VOM and PM emissions with supporting calculations (tons/month and tons/year).
- 7a. 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 m<sup>3</sup> (10,000 gal) for the life of the source pursuant to 40 CFR 60.116b(b).
- b. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel.

8. 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 an Illinois EPA or USEPA request for records during the course of a source inspection.
9. 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 in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
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 Illinois EPA  
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 Illinois EPA  
Division of Air Pollution Control  
Eisenhower Tower  
1701 South First Avenue  
Maywood, Illinois 60153

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

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

DES:GMK:psj  
cc: Region 1

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the polishing wax 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 a production of 8,500 tons of paste wax and 20,000 of liquid polish per year. The resulting maximum emissions are below the levels (e.g., 100 tons per year of PM<sub>10</sub> and 25 tons per year of VOM) 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>Product/Unit</u>	E M I S S I O N S	
	VOM <u>(Tons/Year)</u>	PM <u>(Tons/Year)</u>
Paste Wax	15.30	8.5
Liquid Polish	5.00	20.0
Storage Tanks	<u>0.44</u>	
Totals	<u>20.74</u>	<u>28.5</u>

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## **PROJECT SUMMARY**

### **I. INTRODUCTION**

Turtle Wax, Inc. has voluntarily applied for a renewal of an operating permit for its Bedford Park automotive care products manufacturing facility in order to voluntarily incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by recordkeeping and reporting requirements to assure that the facility is operated as a non-major source.

### **II. SOURCE DESCRIPTION**

Turtle Wax, Inc. manufactures over one hundred different products of the automotive care industry. The products primarily consists of paste wax, liquid polish, and other negligible emitting products. Raw materials (powders, solvents, and non-volatile material) are processed through mixing tanks and then transferred to fillers where it is packaged for consumer use. The company operates nineteen mixing tanks controlled by a rotoclone and ten storage tanks. Heat for operation and space heating is provided by four natural gas fired boilers.

### **III. EMISSIONS**

The principal air contaminant emitted from the facility is volatile organic material (VOM) which is generated during solvent and powder handling/usage throughout the mixing and storage operations. The VOM emissions are uncontrolled. The storage tanks emit negligible emissions of VOM. The secondary air contaminant emitted is particulate matter (PM), which is released during mixing and handling. The PM emissions are controlled by a rotoclone during the mixing process.

### **IV. APPLICABLE EMISSION STANDARDS**

All emission sources in Illinois must comply with the Illinois Pollution Control Boards emission standards at 35 Ill. Adm. Code, Subtitle B. The Board has standards for sources of volatile organic material emissions. This site readily complies with all applicable Board standards.

### **V. PROPOSED PERMIT**

The conditions of the proposed permit contain limitations and requirements to ensure that this facility will be operated as a non-major source. The permit sets limitations on usage of raw materials and product rate. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping requirements, and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the facility is operating within the limitations set by the permit and are properly controlling emissions.

**VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this operation.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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