

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Turtle Wax, Inc.  
Attn: Carolyn Jacobs  
5655 West 73rd Street  
Bedford Park, Illinois 60638

|  |  |
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| <u>Application No.:</u> 73120055                     | <u>I.D. No.:</u> 031012ACM             |
| <u>Applicant's Designation:</u>                      | <u>Date Received:</u> January 10, 2000 |
| <u>Subject:</u> Auto Care Wax Manufacturing          |  |
| <u>Date Issued:</u> May 3, 2000                      | <u>Expiration Date:</u> May 3, 2005    |
| <u>Location:</u> 5655 West 73rd Street, Bedford Park |  |

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of paste wax and liquid polish manufacturing (total 19 mixing tanks) controlled by a rotoclone and 10 storage tanks 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 (FESOP) is issued to limit the emissions of volatile organic material (VOM) and particulate matter (PM) from the facility to less than major source thresholds, i.e., less than 25 tons/year of VOM and less than 100 tons/year of PM, as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
2. This permit is issued based on the wax and polishing manufacturing operations not being subject to the requirements of Subpart QQ of the 35 Ill. Adm. Code Part 218. This is a consequence of the federally enforceable conditions of this permit limiting VOM emissions from these operations to less than applicability threshold level.
3. Operation and emissions of the facility shall not exceed the following limits:
  - a. Volatile Organic Material Emissions:

| <u>Product</u> | <u>Production Rate</u> |                 | <u>Emission</u> | <u>VOM Emissions</u> |                 |
|----------------|------------------------|-----------------|-----------------|----------------------|-----------------|
|                | <u>(Ton/Mo)</u>        | <u>(Ton/Yr)</u> | <u>Factor</u>   | <u>(Ton/Mo)</u>      | <u>(Ton/Yr)</u> |
| Paste Wax      | 850                    | 8,500           | 3.6             | 1.5                  | 15.3            |
| Liquid Polish  | 2,000                  | 20,000          | 0.5             | 0.5                  | 5.0             |

b. Particulate Matter Emissions:

| <u>Product</u> | <u>Powder Usage</u> |               | <u>Emission</u> | <u>PM Emissions</u> |               |
|----------------|---------------------|---------------|-----------------|---------------------|---------------|
|                | <u>(T/Mo)</u>       | <u>(T/Yr)</u> | <u>Factor</u>   | <u>(T/Mo)</u>       | <u>(T/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 ton/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 (ton/month, ton/year);
  - b. Powder usage (ton/month, ton/year);
  - c. The name and identification number of each solvent and its VOM and HAP content; and
  - d. VOM and PM emissions (ton/month and ton/year).
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 an Illinois EPA or USEPA request for records during the course of a source inspection.

8. 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).
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

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: paste wax/liquid polish production and throughput of each material stored in all storage tanks from the previous calendar year, natural gas consumption from the previous calendar year.

It should be noted that this permit has been revised to correct the emission factor in Condition 3b from 1 lb PM/ton to 20 lb PM/ton.

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If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

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

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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 well below the levels, e.g., 100 tons per year of PM 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.

1a. Volatile Organic Material Emissions:

| <u>Product</u> | <u>Production Rate</u> |          | <u>Emission Factor</u><br>(Lb/Ton) | <u>VOM Emissions</u> |          |
|----------------|------------------------|----------|------------------------------------|----------------------|----------|
|                | (Ton/Mo)               | (Ton/Yr) |                                    | (Ton/Mo)             | (Ton/Yr) |
| Paste Wax      | 850                    | 8,500    | 3.6                                | 1.5                  | 15.3     |
| Liquid Polish  | 2,000                  | 20,000   | 0.5                                | 0.5                  | 5.0      |

b. Particulate Matter Emissions:

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

2. 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 ton/year.
  
3. 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.

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