

217/782-2113

"RENEWAL"  
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Accurate Dispersions  
Attn: Ronald Reinstein, Compliance Manager  
192 West 155th Street  
South Holland, Illinois 60473

I.D. No.: 031 297 ACG  
Application No.: 98030121

Date Received: February 24, 2004

Date Issued:

Expiration Date<sup>1</sup>:

Operation of: Accurate Dispersions, Industrial Dispersions and Colorant  
Manufacture for use by Paint Manufacturers

Source Location: 192 West 155th Street, South Holland, Cook County, 60473

Responsible Official: James L. Valukas, Business President

This permit is hereby granted to the above-designated Permittee to OPERATE a industrial dispersion and colorant manufacture for use by paint manufacturers. Products are heavily pigmented colorants/dispersions that are made in a solvent base or a water base, 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 LeeAnne Kinsella at 217/782-2113.

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

DES:LAK:psj

cc: Illinois EPA, FOS, Region 1  
CES  
Lotus Notes  
Operator's address as shown in Section 1.0

<sup>1</sup> Except as provided in Conditions 1.5 and 8.7 of this permit.

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**1.0 INTRODUCTION**

1.1 Source Identification

Accurate Dispersions  
192 West 155th Street  
South Holland, Illinois 60473

708/333-1337

I.D. No.: 031 297 ACG

County: Cook

Standard Industrial Classification: 2851, Paints, Varnishes, Lacquers,  
Enamels and Allied  
Products

1.2 Owner/Parent Company

The Sherwin Williams Company  
101 Prospect Avenue, NW  
Cleveland, Ohio 44115

1.3 Operator

Accurate Dispersions  
192 West 155th Street  
South Holland, Illinois 60473

Ronald Reinstein, Compliance Manager  
708/333-1337

1.4 Source Description

The source is a industrial dispersion and colorant manufacture for use by paint manufacturers. Products are heavily pigmented colorants/dispersions that are made in a solvent base or a water base.

Note: This narrative description is for informational purposes only and is not enforceable.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."
- b. This permit contains Title I conditions that are newly established in this CAAPP permit, which conditions are specifically designated as "T1N."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois 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
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing 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 permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

### 3.0 CONDITIONS FOR 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:

- Recovery Still ROTO3
- 1,000 Gallon Tank and Mixer (P3X1)
- 2,000 Gallon Tank and Mixer (P3X2)
- Space Heaters (40,000 - 1,000,000 Btu/Hr)

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:

None

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)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

### 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 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 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 (see Attachment 2) and 35 IAC Part 266. 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.
- 3.2.2 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 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

### 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
01	High Speed Disperser P1X1	6/89	DC-1 and TO-1
	High Speed Disperser P1X2	8/86	DC-1 and TO-1
	High Speed Disperser P1X3	8/86	DC-1 and TO-1
	High Speed Disperser P1X4	3/95	DC-2 and TO-1
	High Speed Disperser P1X5	4/96	DC-2 and TO-1
	High Speed Disperser P1X6	8/90	DC-2 and TO-1
	High Speed Disperser P1X7	8/90	DC-2 and TO-1
	High Speed Disperser P2X1	1/95	DC-3
	High Speed Disperser P2X2	1/95	DC-3
	High Speed Disperser P2X3	1/95	DC-3
	High Speed Disperser P2X4	1/95	DC-3
	High Speed Disperser P2X5	1/95	DC-3
	High Speed Disperser P2X6	1/95	DC-3
	High Speed Disperser P2X7	1/95	DC-3
	High Speed Disperser P2X8	1/95	DC-3
	High Speed Disperser P2X9	1/95	DC-3
	High Speed Disperser P2X10	10/96	DC-3
	High Speed Disperser P2X11	10/96	DC-3
	High Speed Disperser P2X12	10/96	DC-3
	High Speed Disperser P2X13	10/96	DC-3
	Disperser P1X8S	8/86	TO-1
	Disperser P1X9S	8/86	TO-1
	Eiger Mill P1E1	8/86	TO-1
	Eiger Mill P1E2	8/86	TO-1
	Eiger Mill P1E3	1/89	TO-1
	Eiger Mill P1E4	6/90	TO-1
	Eiger Mill P1E5	8/90	TO-1
	Eiger Mill P1E6	2/92	TO-1
	Eiger Mill P1E7	10/92	TO-1
	Eiger Mill P1E8	10/92	TO-1
	Eiger Mill P1E9	8/94	TO-1
	Eiger Mill P2E1	1/95	DC-3
	Eiger Mill P2E2	1/95	DC-3
	Eiger Mill P2E3	1/95	DC-3
	Eiger Mill P2E4	6/95	DC-3
	Eiger Mill P2E5	10/96	DC-3
	Eiger Mill P2E6	10/96	DC-3
	Eiger Mill P2L1 (Lab)	1/95	N/A
	Eiger Mill P1L1 (Lab)	6/91	TO-1
	Eiger Mill P1L2 (Lab)	1/87	TO-1
Tank Washer TW	5/95	TO-1	
Equipment Washer PW1	4/95	TO-1	
Equipment Washer PW2	6/95	TO-1	
Equipment Washer PW3	12/95	TO-1	
02	5 Mills, 12 Mixers/Dispersers, 18 Tanks, 2 Equipment Washers, a Can Filling Line, One Lab Spray Booth	1/00	Dust Collector
02	50 HP Disperser	12/02	Dust Collector

Emission Unit	Description	Date Constructed	Emission Control Equipment
03	5 Mills, 13 Mixers/Dispersers, 18 Tanks, 2 Equipment Washers, a Can Filling Line, and 2 de-aeration units	11/04	Dust Collector

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

NOTE: In the future this facility can request a FESOP to limit their VOM emissions to less than major. This permit is being issued as a source major for VOM as the facility is still considered major for VOM until such time as Federally Enforceable limits are obtained by the source. This renewal establishes emission limitations for HAP emissions to less than major and issued prior to the compliance date of December 11, 2006 for the NESHAP HHHHH.

### 5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate non-attainment) and/or PM<sub>2.5</sub> and attainment or unclassifiable for all other criteria pollutants CO, lead, NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub>.

### 5.3 Source-Wide Applicable Provisions and Regulations

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

5.3.2 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.
- b. Pursuant to 35 IAC 212.123(a), 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, except as allowed by 35 IAC 212.123(b) and 212.124.

#### 5.3.3 Ozone Depleting Substances

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.

#### 5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.5 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.4 Source-Wide Non-Applicability of Regulations of Concern

5.4.1 This source is not subject to 40 CFR Part 63, Subpart HHHHH, because the source is not a major source of HAPs. (See also Condition 5.6.2)

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	77.84
Sulfur Dioxide (SO <sub>2</sub> )	0.0
Particulate Matter (PM)	14.37
Nitrogen Oxides (NO <sub>x</sub> )	0.0
HAP, not included in VOM or PM	0.0
Total	92.21

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. 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). This condition is being imposed so that the source is not a major source of HAP emissions and the requirements of 40 CFR Part 63, Subpart HHHHH, National Emission Standards for Miscellaneous Coating Manufacturing. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.2, and 5.10.2.

### 5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, 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.

## 5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

### 5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that is source is not a major source of HAPs, the following testing requirements are established:

- a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater

than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:

Test the top five coatings that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.

- b. Testing may be conducted by the supplier of the HAP-containing material.
- c. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.
- d. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

#### 5.9 Source-Wide Recordkeeping Requirements

##### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.2 Records for HAP Emissions

- a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.
- b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.

- c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each coating, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 - 3%) then the highest value shall be used.
- d. The Permittee shall keep a record of the applicability determination for 40 CFR 63, Subpart HHHHH at the source for a period of five years after the determination. This determination shall include a detailed analysis that demonstrates why the Permittee believes the source is not subject to 40 CFR 63, Subpart HHHHH [40 CFR 63.10(b)(3)].

#### 5.9.3 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.

### 5.10 Source-Wide Reporting Requirements

#### 5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

#### 5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the testing, recordkeeping and reporting requirements of Conditions 5.7, 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

### 6.1 Emissions Reduction Market System (ERMS)

#### 6.1.1 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).

#### 6.1.2 Applicability

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

6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.1.8, 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 6.1.5.
  - i. VOM emissions from insignificant emission 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 in Section 7.0 of 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 Condition 6.1.8(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 seasonal 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.

6.1.4 Market Transactions

- 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.

#### 6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.1.3, 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 the 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 emissions 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 after 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.

#### 6.1.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 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 conditions report within two days after the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.1.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions 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 35 IAC 205.337;
  - 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 is 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 October 31 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 135 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 15.26 tons per season.
    - A. This determination includes the use of 1996 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1994 and 1995 season due to non-representative conditions in this season, as allowed by 35 IAC 205.320(a)(2).
  - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.1.10 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 following issuance and, if not retired in this season, the next seasonal allotment period.
  - v. Condition 6.1.3(a) becomes effective beginning in the seasonal allotment period following 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  
None
- 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 emissions 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.

#### 6.1.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.1.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

#### 6.1.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [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 Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 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 its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

**7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS**

7.1 Unit 01: Dispersion and Colorant manufacturing  
Control 01: Dust Collectors and Thermal Oxidizer

7.1.1 Description

The Permittee operates a dispersion and colorant manufacturing source which includes dispersion, milling, grinding, and filling operations. The finished product is typically sold to paint manufacturing facilities which use the product as additives for color and other enhancements.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	High Speed Dispenser P1X1	6/89	DC-1 and TO-1
	High Speed Dispenser P1X2	8/86	DC-1 and TO-1
	High Speed Dispenser P1X3	8/86	DC-1 and To-1
	High Speed Dispenser P1X4	3/95	DC-2 and TO-1
	High Speed Dispenser P1X5	4/96	DC-2 and TO-1
	High Speed Dispenser P1X6	8/90	DC-2 and TO-1
	High Speed Dispenser P1X7	8/90	DC-2 and TO-1
	High Speed Dispenser P2X1	1/95	DC-3
	High Speed Dispenser P2X2	1/95	DC-3
	High Speed Dispenser P2X3	1/95	DC-3
	High Speed Dispenser P2X4	1/95	DC-3
	High Speed Dispenser P2X5	1/95	DC-3
	High Speed Dispenser P2X6	1/95	DC-3
	High Speed Dispenser P2X7	1/95	DC-3
	High Speed Dispenser P2X8	1/95	DC-3
	High Speed Dispenser P2X9	1/95	DC-3
	High Speed Dispenser P2X10	10/96	DC-3
	High Speed Dispenser P2X11	10/96	DC-3
	High Speed Dispenser P2X12	10/96	DC-3
	High Speed Dispenser P2X13	10/96	DC-3
	Dispenser P1X8S	8/86	TO-1
	Dispenser P1X9S	8/86	TO-1
	Eiger Mill P1E1	8/86	TO-1
	Eiger Mill P1E2	8/86	TO-1
	Eiger Mill P1E3	1/89	TO-1
	Eiger Mill P1E4	6/90	TO-1
	Eiger Mill P1E5	8/90	TO-1
	Eiger Mill P1E6	2/92	TO-1
Eiger Mill P1E7	10/92	TO-1	

Emission Unit	Description	Date Constructed	Emission Control Equipment
01 (Cont.)	Eiger Mill P1E8	10/92	TO-1
	Eiger Mill P1E9	8/94	TO-1
	Eiger Mill P2E1	1/95	DC-3
	Eiger Mill P2E2	1/95	DC-3
	Eiger Mill P2E3	1/95	DC-3
	Eiger Mill P2E4	6/95	DC-3
	Eiger Mill P2E5	10/96	DC-3
	Eiger Mill P2E6	10/96	DC-3
	Eiger Mill P2L1 (Lab)	1/95	N/A
	Eiger Mill P1L1 (Lab)	6/91	TO-1
	Eiger Mill P1L2 (Lab)	1/87	TO-1
	Tank Washer TW	5/95	TO-1
	Equipment Washer PW1	4/95	TO-1
	Equipment Washer PW2	6/95	TO-1
	Equipment Washer PW3	12/95	TO-1

7.1.1.3 Applicable Provisions and Regulations

- a. The "affected paint manufacturing operations" for the purpose of these unit-specific conditions, is each operation described in Conditions 7.1.1 and 7.1.2.
- b. The affected paint manufacturing operations are subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate. These requirements are described in Condition 7.1.5.
- c. Affected paint manufacturing operations are subject to 35 IAC 212.321(a), which provides that:

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 and Attachment A. [35 IAC 212.321(a)]
- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material. [35 IAC 218.301]
- e. Section 212.123 Visible Emissions Limitations for All Other Emission Units

- i. 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 Section 212.122 of this Subpart.
- ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected paint manufacturing operations are not subject to 40 CFR Part 63, Subpart HHHHH, for Miscellaneous Coating Manufacturing because the source has chosen to accept synthetic minor limits of HAPs (see Condition 5.6.2) such that they remain non-major for HAPs.
- b. The affected paint manufacturing operations are not subject to 35 IAC, Subpart PP, Miscellaneous Fabricated Product Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.920(A)(2)].
- c. The affected paint manufacturing operations are not subject to 35 IAC, Subpart QQ, Miscellaneous Formulation Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.940(a)(2)].
- d. The affected paint manufacturing operations are not subject to 35 IAC, Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.960(a)(2)].
- e. The affected paint manufacturing operations are not subject to 35 IAC, Subpart TT, Other Emission Units because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.980(a)(2)].
- f. The affected paint manufacturing operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

for Major Stationary Sources, because each affected paint manufacturing operation does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.1.5 Control Requirements and Work Practices

- a. Pursuant to 35 IAC Part 218, Subpart AA, the Permittee shall comply with the following requirements:
  - i. Open-Top Mills, Tanks, Vats or Vessels
    - A. 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.
    - B. The cover remains closed except when production, sampling, maintenance or inspection procedures require access.
    - C. 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 [35 IAC 218.624].
  - ii. Leaks
    - A. 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.
    - B. 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.
    - C. 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.

- D. 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 [35 IAC 218.628].

iii. Grinding Mill

- 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.
- 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.
- 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 [35 IAC 218.625].

iii. Clean Up

- 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.
- 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 [35 IAC 218.630].

- b. The following operational requirements were established in construction permit 95030015 and carried over into the existing FESOP permit 86070063:

- i. The regenerative thermal oxidizer combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F, before the affected paint manufacturing operations have begun, and this temperature shall be maintained during operation of the affected paint manufacturing operations.
  - ii. The Permittee shall follow good operating practices for the regenerative thermal oxidizer, including periodic\* inspection, routine maintenance and prompt\*\* repair of defects.
  - iii. The Permittee shall follow good operating practices for the baghouses, including periodic\* inspection, routine maintenance and prompt\*\* repair of defects.
- \* Periodic for purposes of Condition 7.1.5(b) (ii) and (iii) shall be no less frequently than annually.
- \*\* Prompt for purposes of Condition 7.1.5(b) (ii) and (iii) shall be defined as within 15 days of observation of the defect.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected paint manufacturing operations are subject to the following:

- a. Emissions from the affected paint manufacturing operations shall not exceed the following limits:

VOM Emissions	
Equipment Construction Date 1993 and Before	Equipment Construction Date 1994 - 1998
<u>(Tons/Month)</u>	<u>(Tons/year)</u>
1.73	20.7
2.07	24.9

The above limitations established in previously issued construction permits 95040080, 95020097, 92110060, and 91020049. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these construction permits, 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 these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary compliance assurance mechanism for the equipment and activities permitted in these construction permits and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the facility processes batches of dispersions and coatings. The above emission limitations are based on the sum of the actual emissions from the source in 1993 of 20.7 tons of VOM, as provided in this permit application, and the allowed increase in VOM emissions of 24.9 tons per contemporaneous period from 1994 to 1998 pursuant to 35 IAC Part 203, Major Stationary Sources Construction and Modification. [T1].

- b. 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].

#### 7.1.7 Testing Requirements

- a. Upon request of the Illinois EPA or USEPA, the VOM emissions from an affected paint manufacturing operation shall be determined in accordance with Reference Method 25 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105.

#### 7.1.8 Monitoring and Inspection Requirements

- a. The regenerative thermal oxidizer shall be equipped with a temperature indicator for afterburner combustion chamber temperature.
- b. Monthly inspection to ensure work practices for equipment and activities identified in Condition 7.1.5 are compliant with the practices.

#### 7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected paint manufacturing operation to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

The Permittee shall maintain separate records for the equipment installed prior to and including 1993 and the equipment installed during the contemporaneous time period of 1994 through 1998 for both plant 1 and plant 2. By maintaining separate records will allow the IEPA to

determine compliance with the separate emission limits in Condition 7.1.6.

- a. Product solvent usage, lb/mo and lb/yr for the equipment installed prior to and including 1993 for Plant 1.
- b. Product solvent usage, lb/mo and lb/yr for the equipment installed prior to and including 1993 for Plant 2.
- c. Product solvent usage, lb/mo and lb/yr for the equipment installed between 1994 through 1998 for Plant 1.
- d. Product solvent usage, lb/mo and lb/yr for the equipment installed between 1994 through 1998 for Plant 2.
- e. Clean-up solvent usage, lb/mo and lb/yr for the equipment installed prior to and including 1993 for Plant 1.
- f. Clean-up solvent usage, lb/mo and lb/yr for the equipment installed prior to and including 1993 for Plant 2.
- g. Clean-up solvent usage, lb/mo and lb/yr for the equipment installed during 1994 through 1998 for plant 1.
- h. Clean-up solvent usage, lb/mo and lb/yr for the equipment installed during 1994 through 1998 for plant 2.
- i. Sum of the hours of operation per month of each paint manufacturing plant, hr/mo.
- j. Separate VOM emissions for the equipment installed prior to and including 1993 for plant 1 and plant 2 and the equipment installed during 1994 through 1998 for plant 1 and plant 2 based on the compliance procedures in Condition 7.1.12.
- k. Plant 1 solid material handled (e.g. pigment), ton/mo and ton/yr.
- l. Plant 2 solid material handled (e.g. pigment), ton/mo and ton/yr.
- m. Total PM emissions calculated based on the compliance procedures in Condition 7.1.12.
- n. Maintenance records for the thermal oxidizer control.
- o. Records of the thermal oxidizer combustion chamber temperature.
- p. Cleanup solvent sent to off-site transfers (lb).
- q. Reclaimed cleanup solvent (lb).

Equipment installed prior to and including 1993 is listed below:

P1X1, P1X2, P1X3, P1X6, P1X7, P1X8S, P1X9S, P1E1, P1E2, P1E3, P1E4, P1E5, P1E6, P1E7, P1E8, P1L1, and P1L2

Equipment installed during the contemporaneous time period between 1994 through 1998 is listed below:

P1X4, P1X5, P2X1, P2X2, P2X3, P2X4, P2X5, P2X6, P2X7, P2X8, P2X9, P2X10, P2X11, P2X12, P2X13, P1E9, P2E1, P2E2, P2E3, P2E4, P2E5, P2E6, P2L1, Tank Washer, PW1, PW2, and PW3.

- r. Individual and combination of HAP emissions (tons/month and tons/year).
- s. Leak inspection records and results.
- t. Record of good operating practices for thermal oxidizer and baghouse.
- u. Monthly inspection records from Condition 7.1.8(b).

#### 7.1.10 Reporting Requirements

##### a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected paint manufacturing operations 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:

- i. Notification within 30 days following the occurrence of a violation of the affected paint manufacturing operations with the conditions of this section with a copy of such record for each incident.

#### 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 architectural colorant equipment 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:

Change in the raw materials used, provided the affected architectural colorant equipment continues to comply with the conditions of this permit.

7.1.12 Compliance Procedures

- a. Compliance with the VOM limitation in Condition 7.1.3(b) shall be based on recordkeeping and reporting requirements in Condition 7.1.9 and 7.1.10 and by use of the formula listed in Condition 7.1.12(c).
- b. Compliance with the particulate matter limitations in Condition 7.1.3(c) is assured by the testing requirements in Condition 7.1.7, recordkeeping requirements in Condition 7.1.9 and reporting requirements in Condition 7.1.10 as well as proper operating and maintenance of control equipment.
- c. Compliance with the emission limitations in Condition 7.1.3(d) shall be based on the recordkeeping and reporting requirements in Condition 7.1.9 and 7.1.10 and by use of the formula listed below:

- i. Total VOM emissions from the affected paint manufacturing operations (ton/mo)/sum of the hours of operation per month of each paint manufacturing plant operated that month/2000 lb/ton or in mathematical notation:

$$\text{VOM (lb/hr)} = \frac{\left[ \frac{\text{Total VOM Emissions (ton/mo)}}{\text{Hours of Operation of Plant (hr/mo)}} \right]}{2,000 \text{ lb/ton}}$$

- d. Compliance with emission limitations in Condition 5.5.1 and 7.1.6 shall be based on the recordkeeping and reporting requirements in Condition 7.1.9 and 7.1.10 and by use of the formulas and emission factors listed below:

PLANT 1 VOM EMISSIONS

- i.  $\text{VOM}_1 \text{ (ton)} = [(\text{product solvent usage (lb)}) * (C_1)]/2000 \text{ lb/ton}$

VOM<sub>1</sub> is defined as the captured and controlled VOM emissions from plant 1 production. Capture efficiency in this building is estimated at 50% and the control device efficiency is 99%.

C<sub>1</sub> is a derived constant resulting from 1% of the production solvent VOM emitted to the atmosphere\*, 50% of the production solvent VOM captured to the thermal oxidizer, and 99% control efficiency for the thermal oxidizer.

Therefore  $C_1 = (0.01)(0.50)(1 - 0.99) = 0.00005$

ii.  $VOM_2$  (ton) = [(product solvent usage (lb)) \*  $C_2$ ]/2000 lb/ton

$VOM_2$  is defined as the uncaptured VOM emissions from plant 1 production which is estimated at 50%.

$C_2$  is a derived constant resulting from 1% of the production solvent VOM emitted to the atmosphere\* and 50% of the production solvent VOM uncaptured.

Therefore  $C_2 = (0.01)(0.50) = 0.005$

iii.  $VOM_3$  (ton) = [(cleanup solvent usage (lb) - cleanup solvent lost to offsite transfers (lb)) \*  $C_3$ ]/2000 lb/ton

$VOM_3$  is defined as the captured and controlled VOM emissions from plant 1 cleanup solvent. Capture efficiency in this building is estimated at 50% and the control device efficiency is 99%.

$C_3$  is a derived constant resulting from, 50% of the cleanup solvent VOM captured to the thermal oxidizer, and 99% control efficiency for the thermal oxidizer.

Therefore  $C_3 = (0.50)(1 - 0.99) = 0.005$

iv.  $VOM_4$  (ton) = [(cleanup solvent usage (lb) - reclaimed cleanup solvent (lb) - cleanup solvent lost to offsite transfers (lb)) \*  $C_4$ ]/2000 lb/ton

$VOM_4$  is defined as the uncaptured VOM emissions from plant 1 cleanup solvent which is estimated at 50%.

$C_4$  is a constant resulting from 50% of the cleanup solvent VOM uncaptured.

Therefore  $C_4 = 0.50$

d. Total VOM Emissions Plant 1 (tons) =  $VOM_1 + VOM_2 + VOM_3 + VOM_4$

#### PLANT 2 VOM EMISSIONS

i.  $VOM_1$  (ton) = [(product solvent usage (lb)) \* 0.01]/2000 lb/ton

$VOM_1$  is defined as the uncontrolled emissions from plant 2 production resulting from 1% of the production solvent VOM emitted to the atmosphere\*.

- ii.  $VOM_2$  (ton) = [(cleanup solvent usage (lb) - reclaimed cleanup solvent (lb) - cleanup solvent lost to offsite transfers (lb)) \* 0.50]/2000 lb/ton

$VOM_2$  is defined as the uncaptured VOM emissions from plant 2 cleanup solvent which is estimated at 50%.

$$\text{Total VOM Emissions Plant 2 (tons)} = VOM_1 + VOM_2$$

- iii. Facility Wide VOM Emissions (tons) = Total VOM Emissions Plant 1 + Total VOM Emissions Plant 2

\* Manufacturing emission factor for VOM is equal to 1% of weight of the solvents used and established in section 6.4, AP-42, Fifth Edition

#### PLANT 1 PM EMISSIONS

- i.  $PM_1$  (ton) = (Plant 1 pigment usage (lb) \*  $C_1$ )/2000 lb/ton

$PM_1$  is defined as the captured and controlled particulate emissions from plant 1 production. Capture efficiency is estimated at 50% and the control device efficiency is 99%.

$C_1$  is a derived constant resulting from 0.5% of the pigment lost from the process\*, 50% of the pigment captured to the control device, and 99% efficiency for the control device.

$$\text{Therefore } C_1 = (0.005) (0.50) (1 - 0.99) = 0.000025$$

- ii.  $PM_2$  (ton) = (Plant 1 pigment usage (lb) \*  $C_2$ )/2000 lb/ton

$PM_2$  is defined as the uncaptured particulate emissions from plant 1 production. Uncaptured emissions is estimated at 50%.

$C_2$  is a derived constant resulting from 0.5% of the pigment lost in the process\* and an estimated 50% of the pigment uncaptured.

$$\text{Therefore } C_2 = (0.005) (0.50) = 0.0025$$

$$\text{Total PM Emissions Plant 1 (ton)} = PM_1 + PM_2$$

#### PLANT 2 PM EMISSIONS

- i.  $PM_1$  (ton) = (Plant 2 pigment usage (lb) \*  $C_1$ )/2000 lb/ton

PM<sub>1</sub> is defined as the captured and controlled particulate emissions from plant 2 production. Capture efficiency in this building is estimated at 50% and the control device efficiency is 99%.

C<sub>1</sub> is a derived constant resulting from 0.5% of the pigment lost from the process\*, 50% of the pigment captured to the control device, and 99% efficiency for the control device.

$$\text{Therefore } C_1 = (0.005)(0.50)(1 - 0.99) = 0.000025$$

ii. 
$$PM_2 \text{ (ton)} = (\text{Plant 2 pigment usage (lb)} * C_2) / 2000 \text{ lb/ton}$$

PM<sub>2</sub> is defined as the uncaptured particulate emissions from plant 2 production. Uncaptured emissions are estimated at 50%.

C<sub>2</sub> is a derived constant resulting from 0.5% of the pigment lost in the process\* and an estimated 50% of the pigment uncaptured.

$$\text{Therefore } C_2 = (0.005)(0.50) = 0.0025$$

$$\text{Total PM Emissions Plant 2 (ton)} = PM_1 + PM_2$$

$$\text{Facility Wide PM Emissions (tons)} = \text{Total PM Emissions Plant 1} + \text{Total PM Emissions Plant 2}$$

\* Manufacturing emission factor for PM is equal to 0.5% of weight of the pigments used and established in section 6.4, AP-42, Fifth Edition

7.2 Unit 02: Architectural/Non-Architectural Colorant Equipment  
 Control 02: Dust Collector

7.2.1 Description

The Permittee operates a dispersion and colorant manufacturing source which includes dispersion, milling, grinding, and filling operations. The finished product is typically sold to paint manufacturing facilities which use the product as additives for color and other enhancements.

Note: This narrative description is for informational purposes only and is not enforceable.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
02	Architectural Colorant Equipment: 5 Mills, 12 Mixers/Dispersers, 18 Tanks, 2 Equipment Washers, a Can Filling Line, and One Lab Spray Booth	1/00	Dust Collector
02	1 50 HP Disperser	12/02	Dust Collector

7.2.3 Applicable Provisions and Regulations

- a. The "affected paint manufacturing operations" for the purpose of these unit-specific conditions, is each operation described in Conditions 7.2.1 and 7.2.2.
- b. The affected paint manufacturing operations are subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate. These requirements are described in Condition 7.2.5.
- c. Affected paint manufacturing operations are subject to 35 IAC 212.321(a), which provides that:

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 and Attachment A. [35 IAC 212.321(a)]

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material. [35 IAC 218.301]
- e. Section 212.123 Visible Emissions Limitations for All Other Emission Units
  - i. 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 Section 212.122 of this Subpart.
  - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

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

- a. The affected paint manufacturing operations are not subject to 40 CFR Part 63, Subpart HHHHH, for Miscellaneous Coating Manufacturing because the source has chosen to accept synthetic minor limits of HAPs (see Condition 5.6.2) such that they remain non-major for HAPs.
- b. The affected paint manufacturing operations are not subject to 35 IAC, Subpart PP, Miscellaneous Fabricated Product Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.920(A)(2)].
- c. The affected paint manufacturing operations are not subject to 35 IAC, Subpart QQ, Miscellaneous Formulation Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.940(a)(2)].

- d. The affected paint manufacturing operations are not subject to 35 IAC, Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.960(a)(2)].
- e. The affected paint manufacturing operations are not subject to 35 IAC, Subpart TT, Other Emission Units because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.980(a)(2)].
- f. The affected paint manufacturing operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each affected paint manufacturing operation does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

#### 7.2.5 Control Requirements and Work Practices

Pursuant to 35 IAC Part 218, Subpart AA, the Permittee shall comply with the following requirements:

- a. Open-Top Mills, Tanks, Vats or Vessels
  - 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 [35 IAC 218.624].
- b. Leaks
  - 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 [35 IAC 218.628].
- c. Grinding Mill
- i. 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. No person shall operate a grinding mill which is not equipped with fully enclosed screens.
  - iii. 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 [35 IAC 218.625].
- d. Clean Up
- i. 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. 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 [35 IAC 218.630].

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected paint manufacturing operations are subject to the following:

a. The affected 50 HP disperser (constructed 12/2002) of the plantwide paint manufacturing operations shall not exceed 90 tons/month and 900 tons/year of production of industrial and architectural dispersions. 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). This limit was established in Permit 02120005 [T1N].

b. Emissions from the affected paint manufacturing operations shall not exceed the following limits:

i. Solvent Usage Limits:

A. Non-Architectural Production Solvent: 78 tons/month and 780 tons/year.

B. Architectural Production Solvent: 90 tons/month and 900 tons/year.

C. Clean up (wash) solvent: 18 tons/month and 180 tons/year.

ii. Emissions from the affected 50 HP Disperser shall not exceed the following limits:

<u>(lb/hour)</u>	VOM Emissions	<u>(Ton/Year)</u>
2.2		0.88

<u>(lb/hour)</u>	PM Emissions	<u>(Ton/Year)</u>
0.1		0.2

These limits are based on the compliance procedures specified in Condition 7.2.12.

iii. Emissions from the affected architectural colorant equipment shall not exceed the following limits:

<u>(Tons/Month)</u>	VOM Emissions	<u>(Ton/Year)</u>
1.0		10.0

	PM Emissions	
<u>(Tons/Month)</u>		<u>(Ton/Year)</u>

0.5

4.4

These limits are based on the compliance procedures specified in Condition 7.2.12.

- c. 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].

The above limitations contain revisions to previously issued construction permits 00010010 and 02120005. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these construction permits, 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 these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary compliance assurance mechanism for the equipment and activities permitted in these construction permits and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the facility processes batches of dispersions and coatings. The source has addressed the applicability and compliance of 35 IAC Part 203, Major Stationary Sources Construction and Modification [T1R].

7.2.7 Testing Requirements

- a. Upon request of the Illinois EPA or USEPA, the VOM emissions from an affected paint manufacturing operation shall be determined in accordance with Reference Method 25 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105.

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected paint manufacturing operations.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected paint manufacturing operations to demonstrate compliance with Conditions 5.6.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Product solvent usage (lb/months and tons/year);
- b. Clean-up solvent usage (lb/months and tons/year);
- c. Clean-up solvent sent off-site (lb/month and tons/year);
- d. Cleanup solvent reclaimed at the site (lb/month and tons/year);
- e. Solid material handled (e.g. pigment) (lb/month and tons/year);
- f. VOM emissions (tons/month and tons/year);
- g. Individual and combination of HAP emissions (tons/month and tons/year);
- h. PM emissions (tons/month and tons/year); and
- i. PM emissions (tons/month and tons/year).

7.2.10 Reporting Requirements

Compliance Unit, of deviations of the affected paint manufacturing operations 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. Notification within 30 days following the occurrence of a violation of the affected paint manufacturing operations with the conditions of this section with a copy of such record for each incident.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected architectural colorant equipment 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:

Change in the raw materials used, provided the affected architectural colorant equipment continues to comply with the conditions of this permit.

7.2.12 Compliance Procedures

Compliance with the emission limits established in Conditions 7.2.3 and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. Compliance with the particulate matter limitations in Condition 7.2.3(c) is assured and achieved by the proper operation, maintenance and work-practices inherent in the operation of the affected architectural colorant equipment and associated dust collector.
- b. Compliance with the emission limitations in Condition 7.2.3(d) shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of the formula listed below:

- i. Total VOM emissions from the affected architectural colorant equipment (ton/mo)/sum of the hours of operation per month of each paint manufacturing plant operated that month/2000 lb/ton or in mathematical notation:

$$\text{VOM (lb/hr)} = \frac{\text{Total VOM Emissions (ton/mo)}}{\text{Hours of Operation of Plant (hr/mo)} \times 2,000 \text{ lb/ton}}$$

- c. Compliance with emission limitations in Condition 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of the formulas and emission factors listed below:

- i.  $\text{VOM}_{\text{NAP}} \text{ (ton)} = (\text{Non-Architectural product solvent usage, tons}) \times (0.01^*)$

\* Manufacturing emission factor for VOM is equal to 1% of weight of the solvents used and established in Section 6.4, AP-42, Fifth Edition

- ii.  $\text{VOM}_{\text{AP}} \text{ (ton)} = \text{VOM emissions from the production of Architectural Batches}$  shall be calculated using Volume II: Chapter 8; Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, March 1998 (STAPPA/ALAPCO/EPA).
- iii.  $\text{VOM}_{\text{C}} \text{ (ton)} = (\text{Cleanup solvent usage, tons}) - \text{reclaimed cleanup solvent, tons} - (\text{cleanup solvent lost to offsite transfers, tons})$

iv. Total VOM Emissions (tons) =  $VOM_{NAP} + VOM_{AP} + VOM_C$

v. PM (ton) = (Pigment usage, tons) x (0.005\*) x (1 - 99/100)

\* Manufacturing emission factor for PM is equal to 0.5% of weight of the pigments used and established in section 6.4, AP-42, Fifth Edition

7.3 Unit 03: Architectural Colorant Equipment  
Control: Dust Collector

7.3.1 Description

The Permittee operates a dispersion and colorant manufacturing source which includes dispersion, milling, grinding, and filling operations. The finished product is typically sold to paint manufacturing facilities which use the product as additives for color and other enhancements.

Note: This narrative description is for informational purposes only and is not enforceable.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
03	5 Mills, 13 Mixers/Dispersers, 18 Tanks, 2 Equipment Washers, a Can Filling Line, and 2 De-Aeration Units	11/04	Dust Collector

7.3.3 Applicable Provisions and Regulations

- a. The "affected paint manufacturing operations" for the purpose of these unit-specific conditions, each operation described in Conditions 7.3.1 and 7.3.2.
- b. The affected paint manufacturing operations are subject to 35 IAC 218, Subpart AA: Paint and Ink Manufacturing, because it has the potential to emit 22.7 Mg (25 tons) or more of VOM per year, in aggregate. These requirements are described in Condition 7.3.5.
- c. Affected paint manufacturing operations are subject to 35 IAC 212.321(a), which provides that:

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 and Attachment A. [35 IAC 212.321(a)]

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35

IAC 218.302, 218.303, 218.304 and the following exception:  
If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material. [35 IAC 218.301]

- e. Section 212.123 Visible Emissions Limitations for All Other Emission Units
  - i. 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 Section 212.122 of this Subpart.
  - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

#### 7.3.4 Non-Applicability of Regulations of Concern

- a. The affected paint manufacturing operations are not subject to 40 CFR Part 63, Subpart HHHHH, for Miscellaneous Coating Manufacturing because the source has chosen to accept synthetic minor limits of HAPs (see Condition 5.6.2) such that they remain non-major for HAPs.
- b. The affected paint manufacturing operations are not subject to 35 IAC, Subpart PP, Miscellaneous Fabricated Product Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.920(A)(2)].
- c. The affected paint manufacturing operations are not subject to 35 IAC, Subpart QQ, Miscellaneous Formulation Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.940(a)(2)].
- d. The affected paint manufacturing operations are not subject to 35 IAC, Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.960(a)(2)].

- e. The affected paint manufacturing operations are not subject to 35 IAC, Subpart TT, Other Emission Units because the affected paint manufacturing operations are subject to 35 IAC, Subpart AA, Paint and Ink Manufacturing [35 IAC 218.980(a)(2)].
- f. The affected paint manufacturing operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each affected paint manufacturing operation does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

#### 7.3.5 Control Requirements and Work Practices

Pursuant to 35 IAC Part 218, Subpart AA, the Permittee shall comply with the following requirements:

##### a. Open-Top Mills, Tanks, Vats or Vessels

- 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 [35 IAC 218.624].

##### b. Leaks

- 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 [35 IAC 218.628].
- c. Grinding Mill
- i. 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. No person shall operate a grinding mill which is not equipped with fully enclosed screens.
  - iii. 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 [35 IAC 218.625].
- d. Clean Up
- i. 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. 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 [35 IAC 218.630].
- e. The VOM usage of the affected equipment shall not exceed 262 tons/month and 2,620 tons/yr.
- f. This permit is issued based on the usage of a non-volatile organic material (VOM) and non-hazardous air pollutants

(HAPs) containing material as the clean-up solvent on the affected equipment.

#### 7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected paint manufacturing operations are subject to the following:

- a. The VOM usage of the affected equipment shall not exceed 262 tons/month and 2,620 tons/yr [T1N].
- b. Emissions of VOM from the affected equipment shall not exceed 0.17 ton/mo and 1.7 tons/yr [T1N].
- c. This permit is issued based on negligible emissions of particulate matter (PM) from the affected equipment. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr [T1N].
- d. The above limitations established in previously issued construction permit 04110035. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these construction permits, 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 these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary compliance assurance mechanism for the equipment and activities permitted in these construction permits and the information in the CAAPP application contains the most current and accurate information for the source [T1N].
- e. 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) [T1N].

#### 7.3.7 Testing Requirements

- a. Upon request of the Illinois EPA or USEPA, the VOM emissions from an affected paint manufacturing operation shall be determined in accordance with Reference Method 25 specified in 40 CFR 60 Appendix A, pursuant to 35 IAC 218.105.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected paint manufacturing operations.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected paint manufacturing operations to demonstrate compliance with Conditions 5.6.1 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. For each formulation of coating manufactured in the affected equipment the Permittee shall maintain the following information:
  - i. Name;
  - ii. Composition (i.e. weight of different raw materials);
  - iii. Maximum vapor pressure of the solvents and other VOM and HAP containing raw materials;
  - iv. VOM Content of the solvents and other VOM containing raw materials;
  - v. HAP Content of the solvents and other HAP containing raw materials;
  - vi. Batch size(s);
  - vii. Maximum volumetric displacement rate;
  - viii. Maximum temperatures at which materials are added and mixed;
  - ix. Maximum VOM and HAP emissions, calculated using published methodology, such as USEPA's Emission Inventory Improvement Program (EIIP), along with supporting documentation; and
  - x. Maximum VOM and HAP emissions from the filling line, calculated using published methodology, such as USEPA's EIIP, along with supporting documentation (lb/gallon, lb/mo, and ton/yr), if not included in the above records;
- b. The Permittee shall maintain records of the following items for the affected equipment:
  - i. Architectural production solvent usage (tons/month and tons/year);

- ii. Solid material handled (e.g. pigment) (tons/month and tons/year);
- iii. Total VOM emissions (tons/month and tons/year);
- iv. Individual and combination of HAP emissions (tons/month and tons/year); and
- v. PM emissions (tons/month and tons/year).

#### 7.3.10 Reporting Requirements

##### a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected paint manufacturing operations 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:

- i. Notification within 30 days following the occurrence of a violation of the affected paint manufacturing operations with the conditions of this section with a copy of such record for each incident.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected architectural colorant equipment 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:

Change in the raw materials used, provided the affected architectural colorant equipment continues to comply with the conditions of this permit.

#### 7.3.12 Compliance Procedures

Compliance with the emission limits established in Conditions 7.3.3 and 7.3.6 shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. Compliance with the particulate matter limitations in Condition 7.3.3(c) is assured and achieved by the proper operation, maintenance and work-practices inherent in the operation of the affected architectural colorant equipment and associated dust collector.

- b. Compliance with the emission limitations in Condition 7.3.3(d) shall be based on the recordkeeping requirements in Condition 7.3.9 and by use of the following:
  - i. Actual VOM and HAP emissions will be calculated based upon published accepted methodology, such as USEPA's Emission Inventory Improvement Program (EIIP) and Sherwin-Williams air pollution emission model (APEM). Supporting documentation will be maintained.
  - ii. Maximum VOM and HAP emissions from the filling line, calculated using published methodology, such as USEPA's EIIP, along with supporting documentation (lb/gallon, lb/mo, and ton/yr), if not included in the above records;

## 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 \_\_\_\_\_ (the date of issuance of the proposed 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 that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. 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. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. 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;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

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 Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7) (f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
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 determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

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

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

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

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 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.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- 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, pursuant to Section 39.5(7)(j) and (p) of the Act, 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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

#### 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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (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 applicable requirements; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

#### 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. At 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 including any logs, plans, procedures, or instructions required to be kept 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, Air Quality Planning 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 Unit, 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 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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

- 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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- 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 [Section 39.5(7)(k)(iv) of the Act].

#### 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, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, 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 that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

#### 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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and 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

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

**10.0 ATTACHMENTS**

Attachment 1 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: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- 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 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 IAC 212.321 [35 IAC 212.321(a)].

- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

- A. Up to process weight rates of 408 Mg/hr (450 T/hr):

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

- B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

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

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units 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. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

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

A. Up to 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	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

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

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, [www.epa.state.il.us](http://www.epa.state.il.us). This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-revising.pdf](http://www.epa.state.il.us/air/caapp/caapp-revising.pdf)

Guidance On Renewing A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-renewing.pdf](http://www.epa.state.il.us/air/caapp/caapp-renewing.pdf)

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

[www.epa.state.il.us/air/caapp/index.html](http://www.epa.state.il.us/air/caapp/index.html)

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)

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