

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Engineered Polymer Solutions, Inc.
D/B/A Valspar Coatings
Attn: Kent Babbitt
1191 South Wheeling Road
Wheeling, Illinois 60090

Application No.: 81100051

I.D. No.: 031324ACO

Applicant's Designation:

Date Received: December 11, 2000

Subject: Storage and Mixing Tanks

Date Issued: March 9, 2001

Expiration Date: October 1, 2004

Location: 1191 South Wheeling Road, Wheeling

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 33 storage tanks, mixers, mixing vessels (controlled by a dust collector), holding/mixing tanks, and filling lines for the production of latex paints pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic material, 25 tons/year for combined emissions of hazardous air pollutants, 10 tons/year for any individual hazardous air pollutant and 100 tons/year for particulate matter). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. This permit is issued based on the latex paint manufacturing operations not being subject to the requirements of Subpart AA of the 35 Ill. Adm. Code Part 218. This is a consequence of the voluntary limits placed on production contained in this federally enforceable permit.
- 3a. Operation of the latex paint manufacturing source shall not exceed the following limits:
 - i. Latex Paint Production
 - Latex Paint 3,000,000 gal/mo, 25,000,000 gal/yr.
 - Overall Solvent Usage 150,000 gal/mo, 1,000,000 gal/yr.

HAP Solvent Usage

Ethylene Glycol 75,000 gal/mo, 500,000 gal/yr

Glycol Ether Compounds (Combined): 16,000 gal/mo,
65,000 gal/yr

- Process Rate (all vessels) 30.0 tons/hour
- Minimum Dust Collector Efficiency 99%

ii. Storage Tank Throughput

All tanks shall not store solvent and non-solvent materials with vapor pressures greater than 0.1 psia at 60°F and the average monthly throughput for each tank shall not exceed 305,000 gal/mo.

b. i. VOM Emissions:

<u>VOM</u> <u>Usage Rate</u>	<u>Emission Unit</u>	<u>VOM Emissions</u>
1,000,000 gal/yr	Paint Mfg. Equipment	0.02 lb/gal 10.0 tons/yr
-----	Storage & Cleaning Tanks	----- 3.0 tons/yr
		Total 13.0 tons/yr

This table defines the potential emissions of VOM from paint manufacturing and storage tanks is based on the loss of 0.2% of the solvent and a maximum solvent density of 10.0 lb/gal for paint manufacturing and an assumed loss of 3.0 ton/yr from the low vapor pressure solvent storage tanks.

ii. HAP Emissions from Paint Manufacturing:

<u>Usage</u> <u>(Gal/Yr)</u>	<u>HAP</u>	<u>HAP Emissions</u>
500,000	Ethylene Glycol	0.019 lb/gal 4.75 ton/yr
65,000	Glycol Ethers (Combined)	0.016 lb/gal 0.52 ton/yr
		Total = 5.27 ton/yr

This table defines the potential emissions of HAPs from the source and is based on a 0.2% emission rate of HAPs stated in the permit application.

iii. Particulate Matter Emissions:

<u>Process Rate</u>	<u>Emission Unit</u>	<u>PM Emissions</u>
30.0 tons/hour	Paint Mfg. (mixing vessels)	0.94 lb/hr 4.13 T/yr

These limits are based on the potential emissions of particulate matter from the source and is based on the AP-42 emission factor

of 20 lb PM/ton pigment, 99% control efficiency from dust collectors and the production rate stated in (a) above.

- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus preceding 11 months.

4. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
5. The Permittee shall maintain monthly records of the following items:
 - a. Amount of production of all latex paint produced (gallons), amount of solvents and pigments consumed in latex production (lb) and maximum hourly process rate (ton/hr), and size and amount of cans filled.
 - b. Material stored in each storage tank, throughput of material in each storage tank and VOM vapor pressure of each material.
 - c. VOM Emissions (ton/month and ton/year).
 - d. HAP Emissions (ton/month and ton/year).
6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
8. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control

Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

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

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

9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: paint production and throughput of each material stored in all storage tanks from the previous calendar year. If there have been no exceedances during the prior calendar year the Annual Emissions Report shall include a statement to that effect.
10. This permit contains the federally enforceable conditions from construction permit(s) 00070016. These conditions effectively limit the potential emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) to less than 25 tons per year, etc.). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.

Please note that the two boilers are exempt from state permit requirements pursuant to 35 Ill. Adm. Code 201.146(d).

Also note that this permit is revised to no longer include a cleaning solution tank.

If you have any questions regarding this permit, please call John Blazis at 217/782-2113.

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

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cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
USEPA
PCF #18

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this latex paint manufacturing source operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is producing 25,000,000 gal/yr of latex paint. The resulting maximum emissions are well below the levels (e.g., 25 tons/yr of volatile organic material) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1a. VOM Emissions:

<u>VOM</u> <u>Usage Rate</u>	<u>Emission Unit</u>	<u>VOM Emissions</u>
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the source and is based on the AP-42 emission factor of 20 lb/ton pigment, 99% control efficiency from dust collectors and the production rate stated in (a) above.

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