

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

The Penray Companies, Inc.
Attn: Paul A. Zoubek
440 Denniston Court
Wheeling, Illinois 60090

Application No.: 87110053
Applicant's Designation:
Subject: Aerosol Filling System
Date Issued: December 3, 2002
Location: 440 Denniston Court, Wheeling

I.D. No.: 031324AAB
Date Received: August 24, 2001
Expiration Date: December 3, 2007

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of an aerosol filling system (including 5 storage tanks, blending tanks), pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source threshold (25 tons/year for volatile organic material, 25 tons/year for combined hazardous air pollutants and 10 tons/year for any individual hazardous air pollutant). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program 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 permit(s) issued for this location.
2. This Federally Enforceable State Operating Permit is issued to limit the potential to emit volatile organic materials from this facility to less than 25 tons/year. The facility is therefore not subject to 35 Ill. Adm. Code, Part 218, Subpart DD for Aerosol Can Filling and Subpart QQ for Miscellaneous Formulation Manufacturing processes.
- 3a. Emissions and operation of the following equipment shall not exceed the following limits:

| <u>Emission Unit</u> | <u>VOM Throughput</u> | | <u>VOM Emissions</u> | |
|----------------------|-----------------------|-----------------|----------------------|------------------|
| | <u>(Gal/Mo)</u> | <u>(Gal/Yr)</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
| Storage Tanks | 20,000 | 193,540 | 0.22 | 2.2 |
| Blending | 7,200 | 71,100 | 0.40 | 4.0 |

These limits are based on the maximum throughputs and standard AP-42 emission factors for storage tanks (breathing and working losses) and blending tanks (saturated vapor displacement). Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. Emissions and operation of VOM propellant can filling shall not exceed the following limits:

| <u>Emission Unit</u> | <u>VOM Propellant Cans Production</u> | | <u>VOM Emissions</u> | | |
|----------------------|---------------------------------------|-----------------|----------------------|------------------|------------------|
| | <u>(Can/Mo)</u> | <u>(Can/Yr)</u> | <u>(Gram/Can)</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
| Aerosol Can Filling | 400,000 | 4,000,000 | 0.50 | 0.22 | 2.2 |

These limits are based on maximum production and the worst-case emission rate for this type of operation. Compliance with the annual limits shall be determined on a running total of 12 months of data.

- 4. The emissions of hazardous air pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 10 TPY of any single HAP, or 25 TPY of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- 5a. The Permittee shall maintain monthly records of the following items:
 - i. Storage tank and blending tank throughput in gallons of organic material.
 - ii. Propellant usage rate.
 - iii. Number of cans filled with VOM propellant per line.
 - iv. VOM emissions (tons/month and tons/year).
- b. 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.
- 6. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report

shall include the emissions released in accordance with recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

The condition that requires a source to report any exceedances does not authorize continued operation during such event.

7. 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

8. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year: Usage rates of solvents and propellants. If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

Please note that the 3.2 mmBtu/hr boiler is exempt from state permitting requirements, pursuant to 35 Ill. Adm. Code 201.146(d).

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

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

DES:JPB:jar

cc: Illinois EPA, FOS, Region 1
Illinois EPA, Compliance Section
USEPA - Lotus Notes

ATTACHMENT A - EMISSIONS SUMMARY

This attachment provides a summary of the maximum emissions from the aerosol can filling operations, 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. The resulting maximum emissions are well below the levels, e.g., 25 tons/year of VOM, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

1a. Emissions from the aerosol filling system:

| <u>Emission Unit</u> | <u>VOM Throughput</u> | | <u>VOM Emissions</u> | |
|----------------------|-----------------------|-----------------|----------------------|------------------|
| | <u>(Gal/Mo)</u> | <u>(Gal/Yr)</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
| Storage Tanks | 20,000 | 193,540 | 0.22 | 2.2 |
| Blending | 7,200 | 71,100 | 0.40 | 4.0 |

b.

| <u>Emission Unit</u> | <u>VOM Propellant Cans Production</u> | | <u>VOM Emissions</u> | | |
|----------------------|---|-----------------|----------------------|------------------|------------------|
| | <u>(Can/Mo)</u> | <u>(Can/Yr)</u> | <u>(Gram/Can)</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
| Aerosol Can Filling | 400,000 | 4,000,000 | 0.50 | 0.22 | 2.2 |

2. Emissions from the gas-fired boiler:

| <u>Throughput (mmBtu/Hr)</u> | <u>Emission Unit</u> | <u>Emission Rate (Lb/mmBtu)</u> | <u>VOM Emissions (TPY)</u> |
|----------------------------------|----------------------|-------------------------------------|--------------------------------|
| 3.20 | Gas-Fired Boiler | 0.0055 | 0.08 |

3. The emissions of hazardous air pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 10 TPY of any single HAP, or 25 TPY of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

DES:JPB:jar