

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**RECEIVED**  
CLERK'S OFFICE

AUG 26 2005

STATE OF ILLINOIS  
Pollution Control Board

CARROLL SCIENTIFIC, INC. )

Petitioner, )

v. )

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY, )

Respondent. )

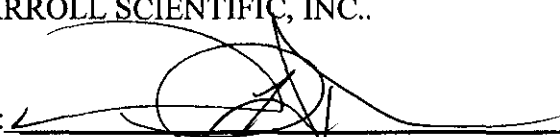
PCB - 06-27  
(Air - 90 Day Extension)

**NOTICE**

To: Sally Carter, Esq.  
Assistant Counsel  
Special Assistant Attorney General  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

**PLEASE TAKE NOTICE** that today I have filed with the Office of the Clerk of the Pollution Control Board **APPEARANCE** of David L. Rieser on behalf of **Carroll Scientific, Inc.**, the **APPEARANCE** of Sally Carter on behalf of the **Illinois Environmental Protection Agency** and a **REQUEST FOR EXTENSION OF APPEAL PERIOD** in the above titled matter. Copies of these documents are hereby served upon you.

CARROLL SCIENTIFIC, INC..

By:   
One of its Attorneys

DATED: August 26, 2005

**MCGUIREWOODS LLP**  
David L. Rieser  
77 West Wacker Drive, Suite 4400  
Chicago, Illinois 60601  
(312) 849-8100

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CARROLL SCIENTIFIC, INC. )  
)  
Petitioner, )  
)  
v. )  
)  
ILLINOIS ENVIRONMENTAL )  
PROTECTION AGENCY, )  
)  
Respondent. )

PCB - 06-29  
(Air - 90 Day Extension)


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STATE OF ILLINOIS  
Pollution Control Board

**APPEARANCE**

I, David L. Rieser, hereby file my appearance in this matter on behalf of **CARROLL  
SCIENTIFIC, INC.**

  
David L. Rieser

**MCGUIREWOODS LLP**  
David L. Rieser  
77 West Wacker Drive, Suite 4400  
Chicago, Illinois 60601  
(312) 849-8100

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STATE OF ILLINOIS  
Pollution Control Board

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Petitioner,

v.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

Respondent.

PCB - *06-29*  
(Air - 90 Day Extension)

**APPEARANCE**

The undersigned, as one of its attorneys, hereby enters her APPEARANCE on  
behalf of Respondent, Illinois Environmental Protection Agency.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

*Sally Carter*

Sally Carter  
Assistant Counsel  
Special Assistant Attorney General  
Division of Legal Counsel

Date: August 24, 2005  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276  
217/782-5544

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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AUG 26 2005

STATE OF ILLINOIS  
Pollution Control Board

CARROLL SCIENTIFIC, INC.

Petitioner,

v.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

Respondent.

PCB - 06-29  
(Air - 90 Day Extension)

**REQUEST FOR NINETY DAY EXTENSION OF APPEAL PERIOD**


Petitioner, Carroll Scientific, Inc. ("CSI"), by and through its attorneys, McGuireWoods LLP, and the Respondent, Illinois Environmental Protection Agency ("IEPA"), pursuant to Section 40(a)(1) of the Illinois Environmental Protection Act (415 ILCS 5/40(a)(1)) and 35 Ill. Adm. Code 105.208(a), respectfully requests the Illinois Pollution Control Board ("Board") to grant an extension of the thirty-five day period for filing petitions to appeal the IEPA's issuance of an air emission unit construction and operating permits until November 28, 2005. In support of this Petition, the parties state as follows:

1. On July 25, 2005, the IEPA issued an operating permit for emissions units operated and to be operated by CSI and on July 28 the IEPA issued a construction permit for the same unit. Copies of these permits are attached hereto and incorporated herein as Exhibit A. The deadline for filing an appeal of this permit is August 29, 2005 and September 1, 2005, respectively.


2. The parties agree that additional time would be useful to continue negotiations and may eliminate the need to submit permit appeals.

WHEREFORE, the parties respectfully request the Board grant an extension of this period for filing appeals of these permits until November 28, 2005.

CARROLL SCIENTIFIC, INC.

By:   
One of its Attorneys

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
Sally Carter  
Special Assistant Attorney General  
Assistant Counsel

Dated: August 24, 2005

David L. Rieser, Esq.  
McGuireWoods LLP  
77 West Wacker Drive  
Suite 4100  
Chicago, IL 60601  
Telephone: 312/849-8100

# Exhibit A



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-2113

## CONSTRUCTION PERMIT

REFERENCE ONLY

PERMITTEE

Carroll Scientific, Inc.  
Attn: Mr. Richard Bradley  
9550 West 55th Street  
McCook, Illinois 60525

Application No.: 05040066I.D. No.: 031174ACJApplicant's Designation:Date Received: April 27, 2005Subject: Ink Additives ManufacturingDate Issued: July 28, 2005Location: 9550 West 55th Street, McCook and 5401 South Dansher Road, Countryside

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a magnetic filter cleaning system as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. This permit is issued based on the filter cleaning system not being subject to 35 Ill. Adm. Code 218.182(c) pursuant to 35 Ill. Adm. Code 218.182(g).
2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of the Clean Air Act.
3. Emissions and operation of the magnetic filter cleaning system shall not exceed the following limits:

Toluene Throughput		Toluene and VOM Emissions	
(Tons/Month)	(Tons/Year)	(Tons/Month)	(Tons/Year)
15	150	1	9.9

These limits are based on all VOM emissions being HAP emissions, 93.4% of toluene remaining in finished product and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. Pursuant to 35 Ill. Adm. Code 218.301, the Permittee shall not cause or allow the discharge of more than 3.6 kg/hour (8 lb/hour) of organic material into the atmosphere from any emission unit.

Page 2

REFERENCE ONLY

5. The Permittee shall maintain the following records:
- a. Wax dispersion, wax compound and varnish production (tons/month and tons/year);
    - i. Size (lb/batch);
    - ii. Composition of batch (lb/batch); and
    - iii. Batch time (hours/batch)
  - b. All throughputs for gravure wax compound processing (gallons/month and gallons/year); and
  - c. Total VOM and HAP emissions using equations from NESHAP for Pharmaceutical Products, 40 CFR 63.1257 (lb/month and tons/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 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:

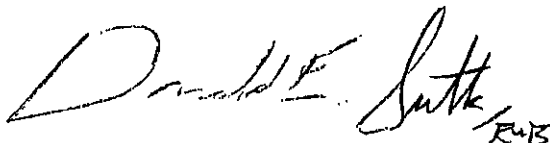
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016



Page 3

REFERENCE ONLY

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

A handwritten signature in black ink, appearing to read "Donald E. Sutton, P.E.", with a stylized flourish at the end.

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

DES:RBS:psj

cc: Region 1



STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF AIR POLLUTION CONTROL  
P. O. BOX 19506  
SPRINGFIELD, ILLINOIS 62794-9506

REFERENCE ONLY

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS  
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
  - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
  - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
  - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
  - d. to obtain and remove samples of any discharge or emissions of pollutants, and
  - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
  - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
  - b. 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 proposed facilities,
  - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
  - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

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REFERENCE ONLY

- c. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
- b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
  - b. upon finding that any standard or special conditions have been violated, or
  - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

P.O. Box 19506, SPRINGFIELD, ILLINOIS 62794-9506

Douglas P. Scott, Director

217/782-2113

OPERATING PERMIT

REFERENCE ONLY

PERMITTEE

Carroll Scientific, Inc.  
Attn: Mr. Richard Bradley  
9550 West 55th Street  
McCook, Illinois 60525

Application No.: 99040036I.D. No.: 031174ACJApplicant's Designation:Date Received: April 18, 2005Subject: Ink Additives ManufacturingDate Issued: July 25, 2005Expiration Date: July 14, 2006Location: 9550 West 55th Street, McCook and 5401 South Dansher Road, Countryside

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

A Powdered Polymer Milling Line with 2 Filters and Bag and Drum Filling with Filter  
Cold Blending Processes, Wax Compound Manufacturing and Varnish Manufacturing  
Wax Dispersion Process Consisting of Three Mixing Tanks, Three Media Mills, a Product Filter, High Speed Disperser DM4 and Three Portable Tanks  
3 Cold Mixers HM1 2 and 3 with Baghouse  
3 Mixers VM8, 9 and 10 with Baghouse  
1 Mixer VM8B  
1 Mixer VM11  
1 Disperser VM13  
1 Media Mill VM12  
1 Ethylene Glycol Ether Storage Tank  
1 Gravure Wax Compound Process Consisting of:  
2 Jacketed Ball Mills  
2 Finished Good Holding Tanks  
2 Resinate Storage Tanks  
2 Toluene Storage Tanks  
4 Finished Goods Storage Tanks  
4 Miscellaneous Storage Tanks  
Truck Loading Operation and a Magnetic Filter Cleaning System From  
Construction Permit 05040066

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit shall expire 180 days after the Illinois EPA sends a written request for the renewal of this permit.
- b. This permit shall terminate if it is withdrawn or is superseded by a revised permit.

ROD R. BLAGOJEVICH, GOVERNOR

REFERENCE ONLY

Page 2

- 2a. This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 Ill. Adm. Code Part 205, pursuant to 35 Ill. Adm. Code 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.
- b. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
- i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures that may be specified in this permit; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- c. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in a Clean Air Act Permit Program (CAAPP) permit or a Federally Enforceable State Operating Permit (FESOP).
- d. Pursuant to 35 Ill. Adm. Code 205.316(a), any participating or new participating source shall not operate without a CAAPP permit or FESOP. Pursuant to 35 Ill. Adm. Code 205.316(a)(2), if a participating or new participating source does not have a CAAPP permit containing ERMS provisions and the source elects to obtain a permit other than a CAAPP permit, the source shall apply for and obtain a FESOP that contains, in addition to other necessary provisions, federally enforceable ERMS provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205.
3. Particulate Matter emissions from the powdered polymer milling line with two filters and bag and drum filling with filter shall not exceed 0.82

Page 3

REFERENCE ONLY

lbs/hour and 3.6 tons/year. these limits are based on manufacturer's specifications of 0.02 gr/dscf, 0.01 gr/dscf, 1400 scfm and 2000 scfm, respectively for the two milling filters, 0.01 gr/dscf and 1200 scfm for the filling filter, and continuous operation (8,760 hours/year).

4. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
5. This permit is issued based on the filter cleaning system not being subject to 35 Ill. Adm. Code 218.182(c) pursuant to 35 Ill. Adm. Code 218.182(g).
6. This permit is issued based on negligible emissions of volatile organic material (VOM) from all storage and holding tanks, and cold blending processes. For this reason, emissions from each operation shall not exceed 0.1 lb/hr and 0.44 tons/year.
7. Emissions and operation of the varnish and wax compound manufacturing operations shall not exceed the following:

<u>Operation</u>	<u>Production</u>		<u>VOM Emissions</u>		<u>Particulate Matter (PM) Emissions</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Wax Compound	1,673	13,391	0.15	1.18	0.05	0.44
Varnish	867	6,936	0.22	1.73	0.05	0.44

These limits are based on a maximum vapor pressure of 1.0 psia, a minimum molecular weight of 201 lb/lb-mole and equations 11 and 12 from the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart GGG, Pharmaceuticals Production, 40 CFR 63.1257. Compliance with annual limits shall be determined from a running total of 12 months of data.

8. This permit is issued based on negligible emissions of VOM and HAPs from the Ethylene Glycol Ether storage tank. For this reason, emissions shall not exceed 0.1 lb/hr and 0.44 ton/yr.
9. Emissions and operation of the gravure wax compound process shall not exceed the following limits:

<u>Equipment</u>	<u>Throughput</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
2 Finished Good Holding Tanks (Total)	91,000	910,000	25	0.13
2 Resinate Storage Tanks (Total)	9,100	91,000	16	0.08
2 Toluene Storage Tanks (Total)	55,800	558,000	41	0.21
4 Finished Goods Storage Tanks (Total)	91,000	910,000	126	0.63
4 Miscellaneous Storage Tanks (Total)	55,700	557,000	51	0.25

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REFERENCE ONLY

<u>Equipment</u>	<u>Throughput</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
2 Jacketed Ball Mills (Total)	91,000	910,000	120	0.6
Truck Loading	155,000	1,550,000	52	0.26
	<u>Toluene Throughput</u>		<u>Toluene &amp; VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Yr)</u>
Magnetic Filter Cleaning System from Construction Permit 05040066	15	150	1	9.9

These limits are based on standard AP-42 emission factors for storage tanks, truck loading, all VOM emissions are HAP emissions, 93.4% of toluene remaining in finished product, and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

10. Emissions and operation of wax dispersion process shall not exceed the following limits:

<u>Process</u>	<u>Throughput</u>		<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Lb/Day)</u>	<u>(Tons/Yr)</u>		<u>(Lb/Day)</u>	<u>(Tons/Yr)</u>
Wax Dispersion	13,672	4,990,572	PM	13.20	2.41
			VOM	2.40	0.42

These limits are based on standard AP-42 emission factors of 0.5% loss of wax, a minimum batch time of 8 hours, 8,760 hours of operation, emission rates determined through equations from NESHA, Subpart GGG, Pharmaceuticals Production, 40 CFR 63.1257, and the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

11. Pursuant to 35 Ill. Adm. Code 218.301, the Permittee shall not cause or allow the discharge of more than 3.6 kg/hour (8 lb/hour) of organic material into the atmosphere from any emission unit.
12. Pursuant to 35 Ill. Adm. Code 212.321, emissions from the 4 media tanks and mixing tank, each source emissions shall not exceed 0.55 lb/hour.
- 13a. The Resinate storage tanks, Toluene storage tanks, finished goods storage tanks, and miscellaneous storage tank(s) are subject to New Source Performance Standards (NSPS), 40 CFR 60 Subpart Kb. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. At all times, the Permittee shall, to the extent practicable, maintain and operate these tanks, in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the New Source Performance Standard.

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REFERENCE ONLY

- c. The Permittee shall fulfill the monitoring of operations requirements of the New Source Performance Standards, 40 CFR 60.116b(a) and (b) for the above listed storage tanks. That is, records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel shall be maintained and readily accessible for the life of the source.
- 14a. This permit is issued based on negligible PM emissions from all new equipment in the Cold Blending and Wax Dispersion operations and negligible VOM emissions from all new equipment in the Cold Blending process (Mixers HM1, 2, 3, VM8, 8B, 9, 10, 11, Disperser VM13 and Media Mill VM12). For this reason, emissions of each pollutant shall not exceed 0.1 lb/hour and 0.44 tons/year. These limits are based on all materials having vapor pressures less than 0.5 psia, and equations from NESHP for Pharmaceutical Products, 40 CFR 63.1257 and Table 6 in application.
- b. Emissions of volatile organic material (VOM) shall not exceed 0.12 tons/month and 1.2 tons/year from the use of Isopropanol, including clean-up, in the wax dispersion process. These limits are based on equations from NESHP for pharmaceutical products, 40 CFR 63.1257.
15. The Permittee shall maintain the following records:
- a. Wax dispersion, wax compound and varnish production (tons/month and tons/year);
- i. Size (lb/batch);
- ii. Composition of batch (lb/batch); and
- iii. Batch time (hour/batch).
- b. All throughputs for gravure wax compound processing, including toluene (gallon/month and gallon/year, tons/month and tons/year); and
- c. Total VOM and HAP emissions using equations from NESHP for Pharmaceutical Products, 40 CFR 63.1257 (lb/month and tons/year).
16. 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 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.
17. 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



REFERENCE ONLY

Page 6

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.

18. 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

19. Persons with lifetime operating permits must obtain a revised permit for any of the following changes at the source:
- An increase in emissions above the amount the emission unit or the source is permitted to emit;
  - A modification;
  - A change in operations that will result in the source's noncompliance with conditions in the existing permit; or
  - A change in ownership, company name, or address, so that the application or existing permit is no longer accurate.

It should be noted that this permit has been revised to incorporate the operation of the wax dispersion process from Construction Permit #02010048. It should also be noted that Lifetime Permit 95010050 has been incorporated into this permit because it is considered to be part of this same source.

It should be noted that storage tanks TK-4 through TK-9, A and B and the 3 natural gas heaters are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(n) and (c), respectively.

Also, please note that corrections have been made for number of emission units, and to VOM emission limits for wax and varnish manufacturing, and wax dispersion process.

REFERENCE ONLY

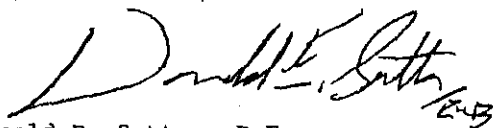
Page 7

Also, please note that the powdered polymer milling line with two filters and bag and drum filling with filter from Construction Permit 05040035 have been added to this permit.

Please also note that equipment from Construction Permit 05040066 has been added to this permit.

It should be noted that during the analysis of this permit application, it was determined that your facility has the potential to emit more than 10 tpy of a single HAP and will be classified as a major source under the Clean Air Act Permit Program (CAAPP). To avoid the CAAPP permitting requirements, you may want to consider immediately applying for a Federally Enforceable State Operating Permit (FESOP). A FESOP is an operating permit which contains Federally enforceable limits in the form of permit conditions which effectively restrict the potential emissions of a source to below major source thresholds, thereby excluding the source from the CAAPP. Please contact the Permit Section at 217/782-2113 to request the necessary application forms. Please note that this permit will expire one year from the initial date of issuance.

If you have any questions on this permit, please contact Randy Solomon at 217/782-2113.



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

DES:RBS:jar

cc: Region 1



STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF AIR POLLUTION CONTROL  
P.O. BOX 19506  
SPRINGFIELD, ILLINOIS 62794-9506

REFERENCE ONLY

STANDARD CONDITIONS  
FOR  
OPERATING PERMITS

May, 1993

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

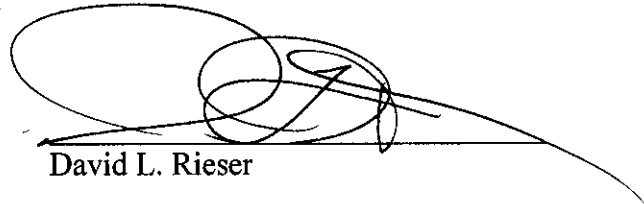
The following conditions are applicable unless superseded by special permit conditions(s).

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 with applicable local laws, ordinances and regulations.
2. 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 ground for revocation under 35 Ill. Adm. Code 201.166.
3.
  - a. The Permittee shall not authorize, cause, direct or allow any modification, as defined in 35 Ill. Adm. Code 201.102, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of the existing permit is filed with the Illinois EPA and unless a new permit or revision of the existing permit(s) is issued for such modification.
  - b. This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted location(s) or if all equipment is removed, notwithstanding the expiration date specified on the permit.
4. The Permittee shall allow any duly authorized agent of the Illinois EPA, upon the presentation of credentials, at reasonable times:
  - a. To enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit;
  - b. To have access to and to copy any records required to be kept under the terms and conditions of this permit;
  - c. To inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit;
  - d. To obtain and remove samples of any discharge or emission of pollutants; and
  - e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring or recording any activity, discharge or emission authorized by this permit.
5. The issuance of this permit:
  - a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are located;

- b. 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 facilities;
  - c. Does not take into consideration or attest to the structural stability of any unit or part of the project; and
  - d. 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 proposed equipment of facility.
6. The facilities covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
  7. The Permittee shall maintain all equipment covered under this permit in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.
  8. The Permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This records shall be made available to any agent of the Environmental Protection Agency at any time during normal working hours and/or operating hours. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.
  9. No person shall cause or allow continued operation during malfunction, breakdown or startup of any emission source or related air pollution control equipment if such operation would cause a violation of an applicable emission standard or permit limitation. Should a malfunction, breakdown or startup occur which results in emissions in excess of any applicable standard or permit limitation, the Permittee shall:
    - a. Immediately report the incident to the Illinois EPA's Regional Field Operations Section Office by telephone, telegraph, or other method as constitutes the fastest available alternative, and shall comply with all reasonable directives of the Illinois EPA with respect to the incident;
    - b. Maintain the following records for a period of no less than two (2) years:
      - i. Date and duration of malfunction, breakdown, or startup,
      - ii. Full and detailed explanation of the cause,
      - iii. Contaminants emitted and an estimate of quantity of emissions,
      - iv. Measures taken to minimize the amount of emissions during the malfunction, breakdown or startup, and
      - v. Measures taken to reduce future occurrences and frequency of incidents.
  10. If the permit application contains a compliance program and project completion schedule, the Permittee shall submit a project completion status report within thirty (30) days of any date specified in the compliance program and project completion schedule or at six month intervals, whichever is more frequent.
  11. The Permittee shall submit an Annual Emission Report as required by 35 Ill. Adm. Code 201.302 and 35 Ill. Adm. Code Part 254.

CERTIFICATE OF SERVICE

I, David L. Rieser, an attorney, hereby certify that I caused the attached pleadings to be served upon all parties listed on the attached Notice via first class U.S. mail from 77 West Wacker Drive, Chicago, IL, on August 26, 2005.



David L. Rieser

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