

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

QC Finishers, Inc.  
Attn: Paul Gratzke  
10228-10244 Franklin Avenue  
Franklin Park, Illinois 60131

Application No.: 99030080

I.D. No.: 031096ANA

Applicant's Designation:

Date Received: March 23, 1999

Subject: Painting Plant

Date Issued: May 3, 2002

Expiration Date: May 3, 2007

Location: 10244 Franklin Avenue, Franklin Park

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of four painting booths, three curing ovens, two painting booths enclosed in the permanent total enclosure controlled by the regenerative adsorber with catalytic afterburner, solvent distillation unit, chromate dip coating line, and silk screen printing operations 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 VOM, 10 tons/year for a single HAP, and 25 ton/year for totaled HAPs). 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.
- 2a. The painting booths are subject to and shall comply with the volatile organic materials (VOM) emission limitations of 35 Ill. Adm. Code Part 218, Subpart F: Coating Operations. Compliance with the requirements of this subpart is achieved through the use of compliance coating pursuant to 35 Ill. Adm. Code 218.204(j)(4)(B) and (n)(1)(A)(i) or through the use of a capture system and control device which provide 81 percent reduction in the overall emissions of volatile organic material (VOM) from the coating line and a control device which provides 90 percent efficiency pursuant to 35 Ill. Adm. Code 218.207(b)(1).
- b. The VOM emissions from painting operations shall not exceed 3.0 tons/mo and 24.0 tons/yr. The VOM emissions shall be calculated using the following equations:

$E = (\sum P_i \times C_i + \sum P_j \times C_j \times (1-C.E./100))/2,000$  where

E - VOM emissions (tons);  
P<sub>i</sub> - Paint usage in uncontrolled paint booths (gal);  
C<sub>i</sub> - VOM content of paint used in uncontrolled paint booths (lb/gal);  
P<sub>j</sub> - Paint usage in controlled paint booths (gal);  
C<sub>j</sub> - VOM content of paint used in controlled paint booths (lb/gal);  
C.E. - Control efficiency of control device (%).

These limits are based on the maximum production rate and actual control efficiency demonstrated during the most recent stack test. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. The emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single hazardous air pollutant or 25 tons per year of any combination of such hazardous air pollutants, 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 hazardous air pollutants from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- 4a. The control system shall be in operation at all times when coating operations are performed in any of the controlled coating booths in accordance with 35 Ill. Adm. Code 218.207(a). The permanent total enclosure shall be designed and operated to comply with requirements of Part 218.Appendix B, Procedure T.
- b. The control device shall be equipped with Illinois EPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications. The monitoring equipment must monitor the following parameters:
  - i. For a catalytic afterburner, the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust.
  - ii. For adsorber, the VOM concentration of adsorption beds exhaust.
- c. The coating booths are allowed to be operated during the adsorber monitoring device malfunctioning for the period of time not exceeding 360 hours in any consecutive 12 months period.
- 5a. Parts painted in the controlled painting booths shall stay within the controlled permanent total enclosure for at least one hour.
- b. Each painted part or batch of painted parts leaving controlled painting booths shall be tagged with a label indicating the time of painting.

6. This permit is issued based upon only VOM-free solvents are used for the paint booths and silk screen cleanup operations.
7. The VOM emissions from solvent distillation unit shall not exceed 0.35 lb/hr and 0.4 ton/yr. These limits are based on the material balance between amount of waste paint processed and solid waste and solvent recovered.
8. This permit is issued based on negligible emission of particulate matter from the chromate coating line. For this purpose emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
9. This permit is issued based on negligible emission of volatile organic materials from the silk screen printing operations. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 10a. The Permittee shall collect and record the following information each day:
  - i. Control devices monitoring data;
  - ii. A log of operating time for the capture system, control devices, monitoring devices, and the associated coating lines;
  - iii. A maintenance log for the capture system, control devices, and monitoring devices detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. The Permittee shall maintain the following monthly records:
  - i. Names and usage of each paint (gallons/month), separately for controlled and uncontrolled application;
  - ii. VOM and HAP content of each paint (lb/gallon);
  - iii. Amount of waste processed in the distillation unit and solid waste and solvent recovered (lb/month);
  - iv. VOM and HAP emission calculations (tons/month and tons/year) (shall be completed before the end of the month following reported month).
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

12. 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 and Enforcement 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.
13. 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 and Enforcement 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 600169

14. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: annual paint usage in controlled and uncontrolled application and their VOM and HAP content.

It should be noted that heating and parts washing equipment are exempt from state permit requirements pursuant to 35 Ill. Adm. Code 201.146(d) and (oo), respectively.

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

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

DES:VJB:psj

cc: IEPA, FOS Region 1  
IEPA, Compliance and Enforcement Section  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from painting operation plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency 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 per year of VOM, 10 tons per year of individual HAP and 25 tons per year for total HAPs 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.

1. The VOM emissions from painting operations shall not exceed 3.0 tons/mo and 24.0 tons/yr. The VOM emissions shall be calculated using the following equations:

$$E = (?P_i \times C_i + ?P_j \times C_j \times (1-C.E./100))/2,000 \text{ where}$$

E - VOM emissions (tons);  
P<sub>i</sub> - Paint usage in uncontrolled paint booths (gal);  
C<sub>i</sub> - VOM content of paint used in uncontrolled paint booths (lb/gal);  
P<sub>j</sub> - Paint usage in controlled paint booths (gal);  
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C.E. - Control efficiency of control device (%).

2. The emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single hazardous air pollutant or 25 tons per year of any combination of such hazardous air pollutants, 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 hazardous air pollutants from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
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4. This permit is issued based on negligible emission of particulate matter from the chromate coating line. For this purpose emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
5. This permit is issued based on negligible emission of volatile organic materials from the silk screen printing operations. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.