

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Nesco Container Corporation  
Attn: Dale Cann  
1801 Benton  
Granite City, Illinois 62040

Application No.: 74070107  
Applicant's Designation: STDRMME  
Subject: Barrel Painting Operation  
Date Issued:  
Location: 1801 Benton, Granite City

I.D. No.: 119040ABW  
Date Received: November 17, 1995  
Expiration Date:

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

First Coat Lacquer Coating Line with Oven  
Main Paint Line with Oven  
Chime Paint Booth  
Three Head Lacquer Booth  
Lacquer Coating Line with Oven  
Shell and Parts Washers  
Dryers  
Silk Screening

as described in 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., 100 tons/yr for VOM, 10 tons/yr for a single HAP and 25 tons/yr for combined HAPs). As a result, the source is excluded from the requirements 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.
2. 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.
3. Emissions and operation of the Solvent usage of the coating operations and silk Screening shall not exceed the following limits:

<u>Materials</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Coatings, Inks, Thinners, and Solvents (Total)		13,700 164,400	13,700	82.20

<u>Materials</u>	HAP <sup>A</sup> Usage		HAP <sup>A</sup> Emissions	
	(Lb/Mo)	(Lb/Yr)	(Lb/Mo)	(Ton/Yr)
Coatings, Inks, Thinners, and Solvents (Total)	1,650	19,800	1,650	9.90

<sup>A</sup> Single Hazardous Air Pollutant

<u>Materials</u>	HAP <sup>B</sup> Usage		HAP <sup>B</sup> Emissions	
	(Lb/Mo)	(Lb/Yr)	(Lb/Mo)	(Ton/Yr)
Coatings, Inks, Thinners, and Solvents (Total)	4,150	49,800	4,150	24.90

<sup>B</sup> Combined Hazardous Air Pollutants

These limits are based on material VOM usage = material usage x material VOM Content, material HAP usage = material usage x material HAP Content complete volatilization of the VOM and HAP content of the materials, and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. The volatile organic matter (VOM) per volume of each non-drum interior coatings, minus water and any compounds which are specifically exempted from the definition of VOM, as applied shall not exceed the limitations contained in 35 Ill. Adm. Code 219.204(j) (2) (B) of 3.3 lb/gal.
5. The volatile organic matter content (VOM) per volume of each drum interior coating, minus water and any compounds which are specifically exempted from the definition of VOM, as applied shall not exceed the limitation contained in 35 Ill. Adm. Code 219.204(j) (3) of 4.3 lb/gal.
6. Emissions and operation of the natural gas fired units shall not exceed the following limits:

<u>Process</u>	Natural Gas Usage		<u>Pollutant</u>	Emission	Emissions	
	(mmscf/Mo)	(mmscf/Yr)		Factor (Lb/mmscf)	(Lb/Mo)	(Ton/Yr)
Natural Gas Combustion	19	224	NO <sub>x</sub>	100	1,900	11.20
			CO	84	1,596	9.41
			PM	7.6	144	0.85
			VOM	5.5	105	0.62
			SO <sub>2</sub>	0.6	11	0.07

These limits are based on standard AP-42 emission factors, natural gas as the only fuel fired in the units, and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

7. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
8. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including material handling or storage activity, beyond the property line of the emission source,

- pursuant to 35 Ill Adm. Code 212.301.
9. The Permittee shall maintain the following records:
    - a. Name, Usage (gal/mo and gal/year), VOM and HAP contents (lb/gal or %wt), and VOM and HAP emissions (lb/mo and Ton/yr) for the following materials:
      - i. Lacquers;
      - ii. Paints;
      - iii. Solvents;
      - iv. Inks; and
      - v. Thinners.
    - b. VOM content of each coating minus water and other exempt compounds as applied to the substrate for each coating for each day of usage; and
    - c. Natural Gas Usage (mmscf/mo and mmscf/yr).
  10. 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, unless otherwise specified, 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.
  11. 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.
  12. 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  
2009 Mall Street  
Collinsville, Illinois 62234

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If you have any questions on this permit, please call Eric Jones 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 3  
USEPA

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the coating 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. This is done through the limited VOM Usage of the VOM containing materials. The resulting maximum emissions are well below the levels, 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined 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 material is handled, coatings used and control measures are more effective than in this permit.

<u>Equipment/Process</u>	E M I S S I O N S (Tons/Yr)						
	<u>PM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	<u>HAP<sup>A</sup></u>	<u>HAPs<sup>B</sup></u>
Lacquers, Paints, Solvents, Inks, and Thinners	---	---	---	---	82.20	9.90	24.90
Natural Gas Combustion Units (Total)	<u>0.85</u>	<u>11.20</u>	<u>9.41</u>	<u>0.07</u>	<u>0.62</u>	_____	_____
Totals:	0.85	11.20	9.41	0.07	82.82	9.90	24.90

<sup>A</sup> Single Hazardous Air Pollutant

<sup>B</sup> Total Combined Hazardous Air Pollutants

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