217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Titan Wheel Corporation of Illinois
Attn: Amy L. Hathaway
2701 Spruce Street
Quincy, Illinois 62301

Application No.: 04050034 I.D. No.: 001806AAB
Applicant's Designation: Date Received: May 15, 2004
Subject: Wheel Manufacturing Plant
Date Issued: Expiration Date:
Location: 2701 Spruce Street, Quincy

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three electro-coat dip tanks controlled by two filters, ten liquid paint booths controlled by nine filters, one powder coating booth controlled by a filter, two gas fired boilers (with fuel oil #2 as back-up), 59.0 mmBtu/hour each, and a paint burn-off oven controlled by an afterburner 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 of volatile organic material (VOM), 10 tons/year of single hazardous air pollutant (HAP), and 25 tons/year of all 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.

2. The coating lines are subject to and shall comply with the volatile organic materials (VOM) emission limitations of 35 Ill. Adm. Code Part 215.204(k)(2). The VOM content of the coatings, as applied, shall not exceed the following limits, excluding water and any compounds which are specifically exempted from the definition of VOM:

Type of Coating	VOM Content (Lb/Gallon)
Extreme Performance Prime Coat	3.5
Extreme Performance Top Coat - Air Dried	4.3
Final Repair Coat – Air Dried	4.8

3a. Volatile organic materials (VOM) usage and VOM emissions from the paints and clean-up solvents usage in the three dip electro-coat tanks and ten liquid paint booths shall not exceed 8.0 tons/month and 70.0 tons/year.

b. The VOM and HAP emissions shall be determined from the following equation:

$$E = \Sigma(P_i \times C_i) + \Sigma\ (S_j \times C_j) - W \times C_w,$$

Where:

E - VOM(HAP) emissions (ton);
P_i - paint usage (ton);
C_i - VOM(HAP) content of the paint (fraction);
S_j - clean-up solvent usage (ton);
C_j - VOM(HAP) content of the solvent (fraction);
W - certified amount of waste solvent shipped-off (ton);
C_w - certified VOM(HAP) content of the waste solvent (fraction).

These limits are based on the maximum operating rate. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

4. Operation and emissions of the two boilers (combined) shall not exceed the following limits:

a. Natural Gas Usage: 55 mmscf/month, 330 mmscf/year

Fuel Oil #2 Usage: 42,000 gallons/month, 42,000 gallons/year

	Emission Factor		Emissions	
Pollutant	(Lb/10^3 Gal)	(Lb/mmscf)	(Tons/Mo)	(Tons/Yr)
Nitrogen Oxides (NO_x)	20	100	2.5	16.6
Carbon Monoxide (CO)	5	84	2.1	13.9
Particulate Matter (PM)	2	7.6	0.2	1.3
Volatile Organic Materials (VOM)	0.2	5.5	0.1	0.9
Sulfur Dioxide (SO_2)	0.6	0.6	0.04	0.3

At the above location, the Permittee shall not utilize in the boilers a distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the 0.3 weight percent pursuant to requirements of 35 Ill. Adm. Code 214.122(b)(2).

These limits are based on the maximum boilers operations and standard emission factors given by AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

5a. This permit is issued based on negligible emissions of particulate matter from the burn-off oven. For this purpose, emissions shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 tons/year.

b. Material insulated with polyvinyl chloride or asbestos, or scrap containing fuming metals tin, zinc, or lead shall not be charged to this oven.

c. The afterburner controlling burn-off furnace shall be in operation at all times when the associated emission unit is in operation.

d. The afterburner shall be equipped with a temperature indicator.

e. The afterburner shall be heated to an operating temperature of 1400°F before charging and this temperature shall be maintained during operation.

6. This permit is issued based on negligible emissions of particulate matter from the powder coating and liquid paint booths. For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

7. 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 to obtain a Clean Air Act Permit Program Permit (CAAPP).

8. The Permittee shall maintain monthly records of the following items:

   a. The names and amounts of liquid paints used in electro-coat tanks and liquid paint booths and category of coating which they are used for (gallons/month and gallons/year);

   b. The names and amounts of clean-up solvents used;

   c. VOM and HAP content of each liquid paint and solvent (lb/gallons);

   d. Natural gas and fuel oil usage (mmscf/month and mmscf/year, gallons/month and gallons/year); and

   e. Plantwide CO, NO_x, PM, VOM, SO_2 and total combined HAP emissions and individual HAP emissions with supporting calculations (tons/month and tons/year).

9. 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.

10. 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.

11. 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
5415 North University
Peoria, Illinois 61614

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

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

DES:GMK:psj

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the wheel manufacturing plant 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 below the levels, (e.g., 100 tons per year of VOM and 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 less material is handled, and control measures are more effective than required in this permit.

	E M I S S I O N S (Tons/Year)						
Equipment/Process	PM	NO_x	CO	SO_2	VOM	Single HAP	Combined HAPs
Dip Electro-Coat Tanks and Liquid Paint Booths (Paints and Clean-up)					70.0		
Powder Coating	0.44						
Boilers Natural Gas and #2 Oil	1.30	16.6	13.9	0.3	0.9		
Burn-Off Oven Controlled by Afterburner	0.44						
Total	2.18	16.6	13.9	0.3	70.9	< 10	< 25

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