

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Gooder-Henrichsen Co., Inc.
Attn: Mr. Charles J. Lee, P.E.
2900 State Street
Chicago Heights, Illinois 60411-0280

Application No.: 95120026

I.D. No.: 031045AMS

Applicant's Designation:

Date Received: September 27, 1999

Subject: Joist Plant

Date Issued:

Expiration Date:

Location: 2900 State Street, Chicago Heights

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 3 paint dip 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 thresholds (i.e., VOM to less than 25 tons per year). 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 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.

- 3a. Emissions and operation of coating operation shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Usage</u>		<u>Maximum VOC</u> <u>(% by Wt.)</u>	<u>VOC Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
3 Paint Dip Tanks	3,834	46,000	10.4	3,987	23.92

These limits are based on 100% evaporation of VOC solvents. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Paint dip coatings must comply with limits in 35 IAC 218.204(j)(2)(A).
4. The Permittee shall maintain monthly records of the following items:
 - a. Usage (gal/mo and gal/yr), VOC content (% by wt.), and VOC Emissions (lb/mo and ton/yr) of the following coating:
 - i. Paint dip coating.
 - b. Joist production (monthly and yearly).
 - c. Must comply with recordkeeping requirements in 35 IAC 218.211.
5. 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.
6. 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.
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
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

8. Annual emissions of VOM shall not exceed 23.92 tons, which shall be the permitted emissions for this site.

It should be noted that the 11 stick welders, 40 MIG welders, and 2 flash welders are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(y).

If you have any questions on this, 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 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from joist production 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 well below the levels, e.g., 25 tons per 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 and operation of coating operation shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Usage</u>		<u>Maximum VOC (% by Wt.)</u>	<u>VOC Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
3 Paint Dip Tanks	3,834	46,000	10.4	3,987	23.92

These limits are based on 100% evaporation of VOC solvents. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Paint dip coatings must comply with limits in 35 IAC 218.204(j)(2)(A).
2. Annual emissions of VOM shall not exceed 23.92 tons, which shall be the permitted emissions for this site.

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PROJECT SUMMARY

I. Introduction

An application for a FESOP permit has been submitted by Gooder-Henrichsen Co., Inc. for a joist coating operation. This permit has been submitted in order to incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by recordkeeping and reporting requirements to assure that the facility is operated as a non-major source. These conditions would be enforceable by both the State of Illinois and USEPA.

II. Source Description

Gooder-Henrichsen Co., Inc. is located in Chicago Heights, Illinois. This facility dips joists into dip tanks to apply a rust protectant coating. The main sources of emissions are from paint usage.

III. Emissions

Emissions of volatile organic material from the 3 joist dip tanks will occur when the VOM contained in the coating volatilizes.

IV. Applicable Emission Standards

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for sources of Volatile Organic Material (VOM). This site readily complies with all applicable Board standards.

V. Proposed Permit

The conditions of the proposed permit contain limitations and requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on the coating and solvent usage.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping requirements, and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the facility is operating within the limitations set by the permit and are properly controlling emissions.

VI. Request for Comments

It is the Illinois EPA's preliminary determination that the facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this operation.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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