

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Cleveland Steel Container Corporation  
Attn: Bob Harding, Plant Manager  
117 East Lincoln  
Peotone, Illinois 60468

Application No.: 95120135

I.D. No.: 197075AAA

Applicant's Designation:

Date Received: February 7, 2007

Subject: Steel Pail Manufacturing

Date Issued:

Expiration Date:

Location: 117 East Lincoln, Peotone, Will County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of pail coating line and roll coating line controlled by a regenerative thermal oxidizer, a litho pail line, coating ovens and comfort heating units 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:
  - i. This federally enforceable state operating permit (FESOP) is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year of any combination of such 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.
  - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. 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. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.

- b. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
- c. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- d. Pursuant to 35 Ill. Adm. Code 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.
- e. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- f. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;

- vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- g. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
3. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F)
- c. Pursuant to 35 Ill. Adm. Code 218.204(j)(3), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 218.206 shall be used to calculate emission limitations for determining compliance by add on

controls, credits for transfer efficiency, emissions trades and cross line averaging.) The emission limitations are as follows:

Miscellaneous Metal Parts and Products Coating	kg/l	lb/gal
Steel pail and drum interior coating	0.52	(4.3)

- d. Pursuant to 35 Ill. Adm. Code 218.207(a), any owner or operator of a coating line subject to 35 Ill. Adm. Code 218.204 may comply with 35 Ill. Adm. Code 218.207, rather than with 35 Ill. Adm. Code 218.204, if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), or (k) of (depending upon the source category) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in 35 Ill. Adm. Code 218.105 and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(e); and the control device is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d) and the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use. A capture system and control device, which does not demonstrate compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), or (k) may be used as an alternative to compliance with 35 Ill. Adm. Code 218.204 only if the alternative is approved by the Illinois EPA and approved by the USEPA as a SIP revision.
- e. Pursuant to 35 Ill. Adm. Code 218.207(b)(1), the coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency.
- f. Pursuant to 35 Ill. Adm. Code 218.207(d), no owner or operator of a miscellaneous metal parts and products coating line which applies one or more coatings during the same day, all of which are subject to the same numerical emission limitation within 35 Ill. Adm. Code 218.204(j) (e.g., all coatings used on the line are subject to 0.42 kg/liter [3.5 lbs/gallon]), and which is equipped with a capture system and control device shall operate the subject coating line unless the requirements in 35 Ill. Adm. Code 218.207(b)(1) or (b)(2) are met.
- g. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- h. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception:

if no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.

5. This permit is issued based upon the source not being subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm. This is consequence of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons per year of any combination of such HAPs, that were established in construction permit 06100063.
6. The litho can line is not subject to the control requirements of 35 Ill. Adm. Code 218.986, pursuant to 35 Ill. Adm. Code 218.980(a) and (b). The maximum theoretical emissions and the potential to emit are less than 90.7 Mg (100 tons) per calendar year of VOM and 22.7 Mg (25 tons) of VOM per year, respectively, in aggregate from emission units at this source that are not regulated by 35 Ill. Adm. Code 218 Subparts B, E, F, H, Q, R, S, T, V, X, Y, Z, or BB.
- 7a. The regenerative thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test, before the coating process is begun, and this temperature shall be maintained during operation of the presses.
- b. The capture and control system shall be operated to achieve at least 90% overall control of VOM/HAP emissions from each coating line, excluding any cleanup activities conducted outside the enclosure of the lines.
- c. The Permittee shall follow good operating practices for the regenerative thermal oxidizer, including periodic inspection, routine maintenance, and prompt repair of defects.
- d. The coating lines shall only be operated with natural gas as the fuel in each coating oven and the regenerative thermal oxidizer.
- e. Pursuant to 35 Ill. Adm. Code 218.107, the operation of any natural gas fired afterburner and capture system used to comply with 35 Ill. Adm. Code Part 218 is not required during the period of November 1 of any year to April 1 of the following year provided that the operation of such devices is not required for purposes of occupational safety or health, or for the control of toxic substances, odor nuisances, or other regulated pollutants.
8. 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.

- 9a. Emissions from the roll coating line shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
VOM	1.4	13.14

The above limitations were established in Permit 02070037, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

- b. Total emissions from the pail coating line, roll coating line and litho pail line shall not exceed the following limits:

E M I S S I O N S					
Single HAP		Total HAPs		VOM	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
0.8	8.0	2.0	20.0	2.45	23.5

The usage of HAPs on the pail coating line, roll coating line and litho pail line are based on the usage and HAP content of HAP containing materials delivered to the lines, adjusted for any material that is recovered and sent off-site for disposal or alternative use, shall not exceed 8 tons and 20 tons per month and 80 and 200 tons per year for each individual HAP and total HAPs, respectively. The above limitations were established in Permit 06100063, pursuant to 40 CFR 63.1(c). These limits ensure that the source is not subject to the requirements of the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm.

- c. The VOM and HAP emissions shall be calculated using the following equations:

Roll Coating Line and Pail Coating Line:

$$\text{VOM or HAP Emissions} = (\text{Coating Usage, gallons}) \times (\text{VOM or HAP Content (lbs/gallon)}) \times (1 - \text{Control Efficiency})$$

Litho Pail Line and Cleanup Solvent:

$$\text{VOM or HAP Emissions} = (\text{Ink and Solvent Usage, gallons}) \times (\text{VOM or HAP Content (lbs/gallon)})$$

- d. Operation and emission of the natural gas fired combustion equipment including coating ovens, thermal oxidizer and comfort heating units shall not exceed the following limits:

- i. Natural Gas Usage: 25 mmscf/month and 250 mmscf/year
- ii. Emissions of nitrogen oxide (NO<sub>x</sub>), carbon monoxide (CO), particulate matter (PM), volatile organic material (VOM) and sulfur dioxide (SO<sub>2</sub>) shall not exceed the following limits:

<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
	<u>Factor</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Nitrogen Oxides (NO <sub>x</sub> )	100	1.25	12.5
Carbon Monoxide (CO)	84	1.05	10.5
Particulate Matter (PM)	7.6	0.10	0.95
Volatile Organic Material (VOM)	5.5	0.07	0.69
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.08

These are the emission factors for uncontrolled natural gas combustion in small boilers with less than 100 mmBtu/hour of heat input (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, March, 1998).

- iii. Emissions of HAPs from other emission units at the source (e.g., natural gas space heaters) shall not exceed 0.50 tons/year.
10. 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 (CAAPP) Permit and the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm.
  11. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
  - 12a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
    - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing

methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
  - b. Testing required by Conditions 13 and 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 13a Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
  - c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
  - d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.

- e. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 14a. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
- b. Pursuant to 35 Ill. Adm. Code 218.105(c)(1)(A), if an emission unit is equipped with (or uses) a permanent total enclosure (PTE) that meets Illinois EPA and USEPA specifications, and which directs all VOM to a control device, then the emission unit is exempted from the requirements described in 35 Ill. Adm. Code 218.105(c)(2). The Illinois EPA and USEPA specifications to determine whether a structure is considered a PTE are given in Method 204 of Appendix M of 40 CFR Part 51. In this instance, the capture efficiency is assumed to be 100 percent and the emission unit is still required to measure control efficiency using appropriate test methods as specified in 35 Ill. Adm. Code 218.105(d).
- c. Pursuant to 35 Ill. Adm. Code 218.105(c)(3), simultaneous testing of multiple lines or emission units with a common control device. If an owner or operator has multiple lines sharing a common control device, the capture efficiency of the lines may be tested simultaneously, subject to the following provisions:
  - i. Multiple line testing must meet the criteria of Section 4 of USEPA's "Guidelines for Determining Capture Efficiency";
  - ii. The most stringent capture efficiency required for any individual line or unit must be met by the aggregate of lines or units; and
  - iii. Testing of all the lines of emission units must be performed with the same capture efficiency test protocol.
- d. Pursuant to 35 Ill. Adm. Code 218.105(c)(4)(D), sources utilizing a PTE must demonstrate that this enclosure meets the requirements given in Method 204 in Appendix M of 40 CFR Part 51 for a PTE during any testing of their control device.
- e. Pursuant to 35 Ill. Adm. Code 218.105(d)(1), the control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified in 35 Ill. Adm. Code 218.105(f).

- f. Pursuant to 35 Ill. Adm. Code 218.105(e)(1), the overall efficiency of the emission control system shall be determined as the product of the capture system efficiency and the control device efficiency or by the liquid/liquid test protocol as specified in 40 CFR 60.433, for each solvent recovery system. In those cases in which the overall efficiency is being determined for an entire line, the capture efficiency used to calculate the product of the capture and control efficiency is the total capture efficiency over the entire line.
- g. Pursuant to 35 Ill. Adm. Code 218.105(f), the methods in 40 CFR Part 60, Appendix A, delineated below shall be used to determine control device efficiencies.
  - i. 40 CFR Part 60, Appendix A, Method 1 or 1A, shall be used for sample and velocity traverses.
  - ii. 40 CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D, shall be used for velocity and volumetric flow rates.
  - iii. 40 CFR Part 60, Appendix A, Method 3, shall be used for gas analysis.
  - iv. 40 CFR Part 60, Appendix A, Method 4, shall be used for stack gas moisture.
  - v. 40 CFR Part 60, Appendix A, Methods 2, 2A, 2C, 2D, 3 and 4, shall be performed, as applicable, at least twice during each test run.
  - vi. Use of an adaptation to any of the test methods specified in 35 Ill. Adm. Code 218.105(f)(1), (2), (3), (4), (5) and (6) may not be used unless approved by the Illinois EPA and the USEPA on a case by case basis. An owner or operator must submit sufficient documentation for the Illinois EPA and the USEPA to find that the test methods specified in 35 Ill. Adm. Code 218.105(f)(1), (2), (3), (4), (5) and (6) will yield inaccurate results and that the proposed adaptation is appropriate.
- 15a. Within two years (730 days) of the initial startup of the RTO or one year (365 days) after completion of the replacement of the existing oxidizers, whichever occurs first, the VOM destruction efficiency (i.e., inlet and outlet emissions) of the control system for pail coating line shall be measured when operating at maximum flow rates and other conditions which are representative of maximum emissions.
- b. The following methods and procedures shall be used for testing of VOM emissions:

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4

Volatile Organic Material

USEPA Method 25A or Method 25 if  
outlet VOM concentration is 50 ppmv  
or more as carbon (non-methane)

- c. At least 90 days before the date that emissions testing is scheduled to be performed, the Permittee shall submit a written test plan to the Illinois EPA for review and comment. This plan shall describe the specific procedures for testing, including as a minimum:
  - i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
  - ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
  - iii. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
  - iv. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods.
- d. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date of testing. Confirmation of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may accept notifications with shorter advance notice, however the Illinois EPA will not accept such notifications if it interferes with the ability of the Illinois EPA to observe testing.
- e. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 30 days after the test results are compiled and finalized and no later than 45 days after the date of testing. The Final Report shall include at a minimum:
  - i. A summary of results;
  - ii. General information;
  - iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule;
  - iv. Detailed description of test conditions, including:
    - A. Process information, including process rate, e.g., material processed, VOM content, and VOM emissions available for control calculated by material balance.

- B. Control equipment information, i.e., equipment condition, oxidizer combustion chamber temperature and operating parameters during testing.
  - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- 16a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
- b. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of  $\pm 1$  percent of the temperature measured in degrees Celsius or  $\pm 0.5^\circ$  C, whichever is greater.
17. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR

63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

18. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 19a. Pursuant to 35 Ill. Adm. Code 218.105(c)(4)(A), all owners or operators affected by 35 Ill. Adm. Code 218.105(c) must maintain a copy of the capture efficiency protocol submitted to the Illinois EPA and the USEPA on file. All results of the appropriate test methods and capture efficiency protocols must be reported to the Illinois EPA within 60 days of the test date. A copy of the results must be kept on file with the source for a period of 3 years.
  - b. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(2) or (a)(3) and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record all of the following information for each coating line and maintain the information at the source for a period of three years:
    - i. The name and identification number of each coating as applied on each coating line.
    - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
  - c. Pursuant to 35 Ill. Adm. Code 218.211(e)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g) or (h) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
    - i. Control device monitoring data.
    - ii. A log of the operating time for the capture system, control device, monitoring equipment and the associated coating line.
    - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- 20a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit:

- i. Coating usage (tons/month and tons/year);
  - ii. VOM content of materials;
  - iii. Annual storage tanks throughputs;
  - iv. Solvent usage (lbs/month and tons/year);
  - v. Natural gas usage (mmscf/month and mmscf/year); and
  - vi. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAPs, with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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.
21. If there is an exceedance of or deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
22. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 23a. Pursuant to 35 Ill. Adm. Code 218.105(c)(4)(B), if any changes are made to capture or control equipment, then the source is required to notify the Illinois EPA and the USEPA of these changes and a new test may be required by the Illinois EPA or the USEPA.
- b. Pursuant to 35 Ill. Adm. Code 218.105(c)(4)(C), the source must notify the Illinois EPA 30 days prior to performing any capture efficiency or control test. At that time, the source must notify the Illinois EPA which capture efficiency protocol and control device test methods will be used. Notification of the actual date and expected time of testing must be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion accept

notification with shorter advance notice provided that such arrangements do not interfere with the Illinois EPA's ability to review the protocol or observe testing.

- c. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 of and complying by means of 35 Ill. Adm. Code 218.204 shall notify the Illinois EPA in the following instances:

- i. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
- ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), respectively. Upon changing the method of compliance from 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), respectively.

- d. Pursuant to 35 Ill. Adm. Code 218.211(e)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g) or (h) shall notify the Illinois EPA in the following instances:

- i. Any record showing violation of 35 Ill. Adm. Code 218.207 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
- ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(c) or (d), respectively.

- 24. Two (2) copies of required reports and notifications 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:

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

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

Edwin C. Bakowski, P.E.  
Acting Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:DWH:jws

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the steel pail 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, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP) 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.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						<u>Total HAPs</u>
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	<u>Single HAP</u>	
Pail Coating Line, Roll Coating Line & Litho Pail Line					23.50	8.0	20.0
Fuel Combustion	<u>10.5</u>	<u>12.5</u>	<u>0.95</u>	<u>0.08</u>	<u>0.69</u>	<u>0.5</u>	<u>0.5</u>
Totals	10.5	12.5	0.95	0.08	24.19	8.5	20.5

ECB:DWJ:jws