

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Enamellers and Japanners, Inc.  
Attn: Ken Cielocha  
3022 North Rockwell  
Chicago, Illinois 60618

<u>Application No.:</u> 73010422	<u>I.D. No.:</u> 031600ADF
<u>Applicant's Designation:</u>	<u>Date Received:</u> July 17, 2000
<u>Subject:</u> Miscellaneous Metal Parts and Products Coating Plant	
<u>Date Issued:</u> December 14, 2000	<u>Expiration Date:</u> December 14, 2005
<u>Location:</u> 3022, 3035, 3041, and 3045 North Rockwell and 3017 North Elston, Chicago	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 7 powder coat booths with filters, 2 sanding booths with filters, 2 caustic paint strip tanks, 5 VOM paint strip tanks, aluminum cleaning line, paint burnoff oven with afterburner, 19 paint booths with filters, electrostatic spray booth and touch-up booth with filters, 9 ovens, boilers, and ETS air tempering unit 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/yr for volatile organic material (VOM), 10 tons/yr for a single hazardous air pollutant (HAP), and 25 tons/yr for all 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.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 218.204(j)(2)(B) the coatings applied in the 19 paint booths, electrostatic spray booth, and touch-up booth shall not exceed 3.3 lb VOM/gal of coating (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator.
  - b. The 5 VOM paint stripping tanks shall operate in accordance with the operating and equipment requirements pursuant to 35 Ill. Adm. Code 218.182.
- 3a. Operations and emissions from the 19 paint booths, electrostatic spray booth, touch-up booth and the 5 VOM paint stripping tanks shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Content</u> <u>(Lb VOC/Gal)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Coating	1,740	17,400	1.25*	1.1	10.90
Toluene	194	1,940	7.22	0.7	7.00
MEK	30	300	6.71	0.1	1.00
Glycol Ethers	22	216	9.31	0.1	1.00
Paint Stripper	176	1,760	2.27	2.2	2.00
Total					21.90

\* Average VOM content used for establishing maximum emissions. Maximum VOC content is limited to 3.3 lb VOC/gal as required by 35 Ill. Adm. Code 218.204(j)(2)(B).

These limits are based upon maximum material usage, the allowable VOM content pursuant to 35 Ill. Adm. Code 218.204(j)(2)(B) and a material balance calculation.

- b. The emissions of 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 by 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 HAPs from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA.
- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data from the previous month plus the preceding 11 months (i.e., a 12 month running total).
- 4a. Emissions and operation of all fuel combustion sources shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo)(mmscf/Yr)</u>		<u>Pollutant</u>	<u>Emission Factor</u>		
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>		<u>(Lb/mmscf)</u>		
Natural Gas	16	160	NO <sub>x</sub>	100	0.8	8.0
			CO	84	0.67	6.72
			VOM	5.5	0.05	0.44

These limits define the potential emissions of NO<sub>x</sub>, CO, and VOM and are based on maximum fuel usage, standard emission factors, and conversion factors of 100 scf/therm. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel used in all fuel combustion sources. Use of any other fuel other than natural gas requires a permit change.

5. Emissions and operation of the aluminum cleaning line shall not exceed the following limits:

<u>Emission Unit</u>	<u>Process Rate</u>		<u>NO<sub>x</sub> Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Tons/Yr)</u>
Aluminum Cleaning Line	7.70	92.35	0.20	2.39

These limits are based upon the maximum process rate and the maximum NO<sub>x</sub> emissions. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. This permit is based upon negligible emissions of particulate matter from the 3 coating booths (#1J, 1K, and 3E), 5 coating booths (#2A, 2B, 4A, 4B, and 4C), 7 powder coat booths, 2 sanding booths, 2 caustic paint strip tanks, and paint burnoff oven. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hr and 0.44 ton/yr from each emission unit.
- 7a. Material insulated with polyvinyl chloride or asbestos, or scrap containing the fuming metals tin, zinc, or lead shall not be charged to this oven.
- b. The afterburner shall be heated to an operating temperature of 1400°F before charging and this temperature shall be maintained during operation.
- c. The oven shall be equipped with an afterburner temperature indicator.
8. In the event that the operation of this emission unit 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.
9. The Permittee shall maintain monthly records of the following items:
- Name and identification number of each coating and solvent used;
  - Material usage (gal/month and gal/yr);
  - VOM and HAP content of each type of material (lb VOC/gal);
  - Total natural gas usage (mmscf/mo and mmscf/yr); and
  - VOM, NO<sub>x</sub>, and CO emissions (ton/mo and ton/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 and shall be made available for inspection and copying by the Illinois EPA and 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 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, a description of the exceedances 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  
9511 West Harrison  
Des Plaines, Illinois 60016

13. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
  - a. Material usage (gal/month and gal/yr).
  - b. VOM and HAP content of each type of material (lb VOC/gal).
  - c. Total natural gas usage (therms/month and therms/yr).

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

It should be noted that this permit has been revised to include the operation of 2 powder coating booths and to change the emission limits of Conditions 3 and 4.

Page 5

If you have any questions on this permit, please call Tara T. Nguyen-Ede 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 Unit  
Lotus Notes

Attachment A

This attachment provides a summary of the maximum emission of the miscellaneous metal parts and products coating 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 the plant. This is a maximum usage of VOM containing material from the 19 paint booths, electrostatic spray booth, touch-up booth and the 5 VOM paint stripping tanks and the use of 1,423,500 therms/yr of natural gas for the 5 batch bake ovens, 3 continuous bake ovens, boiler, ETS air tempering unit, and the paint burnoff oven with afterburner. The resulting maximum emissions are below the threshold levels (e.g., 25 tons/yr for VOM, 10 tons/yr for a single HAP, 25 tons/yr for all HAPs, and 100 tons/yr for NO<sub>x</sub>) at which this source would be considered a major source for purposes of the CAAPP. Actual emissions from this source will be less than predicted in this summary to the extent that VOM containing material and natural gas usage is less than that required in this permit.

1. Operations and emissions from the 19 paint booths, electrostatic spray booth, touch-up booth and the 5 VOM paint stripping tanks shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Content</u> <u>(Lb VOC/Gal)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
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These limits are based upon maximum material usage, the allowable VOM content pursuant to 35 Ill. Adm. Code 218.204(j)(2)(B) and a material balance calculation. Compliance with annual limits shall be determined from a running total of 12 months of data.

2. The emissions of 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 by 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 HAPs from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA.
- 3a. Emissions and operation of all fuel combustion sources shall not exceed the following limits:

<u>Material</u>	<u>(mmscf/Mo)(mmscf/Yr)</u>		<u>Pollutant</u>	<u>Emission</u>		
				<u>Factor</u>	<u>(Ton/Mo)(Ton/Yr)</u>	
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- b. Natural gas shall be the only fuel used in all fuel combustion sources. Use of any other fuel other than natural gas requires a permit change.
- 4. Emissions and operation of the aluminum cleaning line shall not exceed the following limits:

<u>Emission Unit</u>	<u>Process Rate</u>		<u>NO<sub>x</sub> Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Tons/Yr)</u>
Aluminum Cleaning Line	7.70	92.35	0.20	2.39

These limits are based upon the maximum process rate and the maximum NO<sub>x</sub> emissions. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 5. This permit is based upon negligible emissions of particulate matter from the 3 coating booths (#1J, 1K, and 3E), 5 coating booths (#2A, 2B, 4A, 4B, and 4C), 7 powder coat booths, 2 sanding booths, 2 caustic paint strip tanks, and paint burnoff oven. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hr and 0.44 ton/yr from each emission unit.

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