

217/782-2113

"REVISED"
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Blaw-Knox Construction Equipment Corporation
Attn: Wayne Toney
750 Broadway Avenue East
Mattoon, Illinois 61938-4600

<u>Application No.:</u> 73110195	<u>I.D. No.:</u> 029805AAG
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 18, 2000
<u>Subject:</u> Metal Fabrication	
<u>Date Issued:</u> January 1, 2001	<u>Expiration Date:</u> November 20, 2005
<u>Location:</u> 750 Broadway Avenue East, Mattoon	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of four paint booths and one 10,000 gallon lubricating oil storage tank 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., 100 tons/year of VOM, 25 tons/year total HAPs, and 10 tons/year for a single HAP). 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.
- 2a. The total volatile organic material (VOM) usage and emissions emitted from this facility shall not exceed 50.7 tons/year and 5.56 tons in any one month.
- b. The total individual hazardous air pollutants (HAPs) emitted from this facility shall not exceed 1.06 tons/month and 9.5 tons/year per HAP and 2.1 tons/month and 25 tons/year total HAPs.
3. Application of coating and solvent usage and emissions of volatile organic material shall not exceed the following limits:

<u>Operation</u>	<u>Usage</u>		<u>VOM</u>	<u>VOM Emissions**</u>		<u>HAP Emissions*</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Content</u> <u>(Lb/Gal)</u>	<u>(Lb/Mo)</u>	<u>(TPY)</u>	<u>(Lb/Mo)</u>	<u>(TPY)</u>
Primer Coatings	1,566	18,801	3.18	4,980	29.9	2,531	14.6
Top Coatings	707	8,476	3.4	2,404	14.4	755	4.3
Cleanup Solvents	113	1,360	7.25	819	4.9	817	4.7
High Temp. Coatings	30	371	4.34	130	0.8	66	0.4

* Emission limits shown are for total HAPs individual HAPs are additionally limited to 9.5 TPY.

** Total VOM usage and emissions from this facility shall not exceed 5.56 tpm and 50.7 TPY.

These tables define the maximum emissions of the plant and are based on the maximum usage of each material, maximum VOM and HAP contents indicated in the permit application as specified above. Compliance with the 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. Emissions from natural gas combustion shall not exceed:

Usage		E M I S S I O N S					
(mmscf/Mo)	(mmscf/Yr)	NO _x	CO				VOM
		(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
8.3	83	0.42	4.2	0.35	3.5	0.03	0.23

These limits are based on maximum natural gas usage and standard AP-42 emission factors. Compliance shall be determined from a running total of the previous 12 months of data.

5. Within 30 days of a written request from the Illinois EPA, a test shall be performed which will allow evaluation of the coating(s) Aas-applied@ on the coating lines in order to determine compliance with 215.204(k)(2) and as shown in Attachment A.
6. The test shall be performed by a qualified independent laboratory using the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 215.208 and USEPA Method 24 (refer to 40 CFR 60, Appendix A).
7. The Permittee shall submit data including VOM content of the materials (minus water and exempt compounds), a justification as to why the coating(s) is/are representative, a description of the sampling procedures, and documentation for the analysis.
8. At all times the Permittee shall, to the extent practicable, maintain and operate the equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.
9. 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 nuisance.
10. This permit is issued based on negligible emissions of VOM from the hydraulic oil storage tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

- 11a. This permit is issued based on emissions of volatile organic material (VOM) from the use of clean-up solvents and high temperature coatings from any emission unit not exceeding 8 lb/hr pursuant to 35 Ill. Adm. Code 215.301.
 - b. Primer and top coating coatings as applied, including thinner or make-up solvent, shall not exceed VOC content of 3.5 lb of VOC per gallon of coating and 4.3 lb of VOC per gallon of coating, respectively, pursuant to 35 Ill. Adm. Code 215.204(k)(2).
12. The Permittee shall maintain records of the following items:
- a. Natural gas usage (mmscf/month and mmscf/year);
 - b. Usage of each coating and solvent (lb/month and tons/year);
 - c. Solvent shipped off site (lb/month, tons/year);
 - d. VOM and HAP content of each coating and solvent as applied (lb/gal or wt. %); and
 - e. VOM, single HAP and total HAPs emissions (tons/month and tons/year).
13. 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.
14. 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.
15. 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.

16. 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

17. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Natural gas usage (mmscf/month and mmscf/year); coating and solvent usage (gallon/month and gallon/year); VOM and HAP content of each coating and solvent as applied (lb/gallon or wt. %); VOM, single HAP and total HAPs emissions (tons/month and tons/year).

Please note that source #0008, annealing furnace, has been removed from this permit.

Also, please note that emissions from natural gas combustion have been added to this permit.

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

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

DES:RBS:jar

cc: Illinois EPA, FOS Region 3
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating process 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. This is using 29,008 gallons of paints and solvents. The resulting maximum emissions are well below the levels, e.g., 100 tons/year of VOM, 25 tons/year total HAPs, and 10 tons/year for a single 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.

1. Volatile organic material (VOM) and hazardous air pollutant (HAP) emissions for this facility are estimated as follows:

<u>Operation</u>	<u>Usage</u>		<u>VOM</u>	<u>VOM Emissions**</u>		<u>HAP Emissions*</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Gal)</u>	<u>(Lb/Mo)</u>	<u>(TPY)</u>	<u>(Lb/Mo)</u>	<u>(TPY)</u>
Primer Coatings	1,566	18,801	3.18	4,980	29.9	2,531	14.6
Top Coatings	707	8,476	3.4	2,404	14.4	755	4.3
Cleanup Solvents	113	1,360	7.25	819	4.9	817	4.7
High Temp. Coatings	30	371	4.34	130	0.8	66	0.4

* Emission limits shown are for total HAPs individual HAPs are additionally limited to 9.5 TPY.

** Total VOM usage and emissions from this facility shall not exceed 5.56 tpm and 50.7 TPY.

These tables define the maximum emissions of the plant and are based on the maximum usage of each material, maximum VOM and HAP contents indicated in the permit application as specified above. Compliance with the annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

2. This permit is issued based on negligible emissions of VOM from the hydraulic oil storage tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
3. Emissions from natural gas combustion shall not exceed:

<u>Usage</u>		<u>E M I S S I O N S</u>				<u>VOM</u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>NO_x</u>	<u>CO</u>	<u>NO_x</u>	<u>CO</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
		<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>		
8.3	83	0.42	4.2	0.35	3.5	0.03	0.23

RBS:jar