

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Skolnik Industries, Inc.  
Attn: Howard B. Skolnik  
4900 South Kilbourn Avenue  
Chicago, Illinois 60632

Application No.: 88020071                      I.D. No.: 031600FHF  
Applicant's Designation:                      Date Received: January 13, 2000  
Subject: Steel Drum Manufacturing Facility  
Date Issued: May 3, 2000                      Expiration Date: May 3, 2005  
Location: 4900 South Kilbourn Avenue, Chicago

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five paint booths (PSB-1,2,3,4,5) with dry filters DF-1,2,3,4,5) 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 for VOM, 10 tons/year for a single HAP and 25 tons/year for combined 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. This permit is issued based upon the paint booths being a subject to the VOM emission limitations of 35 Ill. Adm. Code Part 218 Subpart F: Coating Operations. Compliance with these requirements is achieved due to the use of the paints with VOM content in accordance with the requirements of Sections 218.204(j)(3) and (2)(A).
3. Operation and VOM emissions of the paint booths shall not exceed the following limits:

<u>Type of Operation</u>	<u>Material Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lb/Gal)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Exterior Coating	1,000	9,880		3.09	1.55
15.26 Interior Coating	300	2,860	4.20	0.63	6.00
Clean-up	20	200	6.88	0.07	<u>0.69</u>

Totals 21.95

These limits define the potential emissions of VOM and are based on the actual emissions determined from maximum production capacity. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus preceding 11 months.

4. 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 Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
5. The Permittee shall maintain monthly records of the following items:
  - a. The name and identification number of each coating as applied;
  - b. The weight of VOM per volume of each coating (minus water and exempt compounds which are specifically exempted from the definition of VOM) as applied;
  - c. Coating usage (gal/month and gal/year);
  - d. Clean-up usage (gal/mo and gal/year); and
  - e. HAP consumption (lb/mo and lb/year).
6. 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 request for records during the course of a source inspection.
7. 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 Unit 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 exceedances or violation and efforts to reduce emissions and future occurrences.

8. 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 Illinois EPA  
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 Illinois EPA  
Division of Air Pollution Control - Regional Office  
Eisenhower Tower  
1701 First Avenue  
Maywood, Illinois 60153

9. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: paint and solvent usage. If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

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

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

DES:VJB:psj

cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the drum 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. This is using 12,470 gallons of paint and 200 gallons of clean-up solvent. The resulting maximum emissions are well below the levels, 25 tons per year of VOM, 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 material is handled, coatings used and control measures are more effective than in this permit.

1. Emission of volatile organic material (VOM) from the drum coating operation.

<u>Type of Operation</u>	<u>Material Usage</u>		<u>VOM Content</u> <u>(Lb/Gal)</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>		<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Exterior Coating	1,000	9,880	3.09	1.55	15.26
Interior Coating	300	2,860	4.20	0.63	6.00
Clean-up	20	200	6.88	0.07	<u>0.69</u>
				Totals	21.95

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 Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.

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