

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) -- NESHAP SOURCE

PERMITTEE

Parsons Company, Inc.
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1386 State Route 117
Roanoke, Illinois 61561

<u>Application No.:</u> 12050003	<u>I.D. No.:</u> 179445AAA
<u>Applicant's Designation:</u>	<u>Date Received:</u> May 1, 2012
<u>Subject:</u> Custom Industrial Equipment Plant	
<u>Date Issued:</u> October 11, 2012	<u>Expiration Date:</u> October 11, 2022
<u>Location:</u> I-74 Drive Lot 6, Goodfield, Woodford County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Two (2) Spray Booths Controlled With Fabric Filters (Spray Booth 1 and Spray Booth 2); and
One (1) 2.0 mmBtu/Hour Natural Gas-Fired Bake Oven

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. 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 any single Hazardous Air Pollutant (HAP) and 25 tons/year for 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 establish 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/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm.
- 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. Spray Booth 1 and Spray Booth 2 are subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63 Subparts A and XXXXXX. The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 63.11514(b), the provisions of 40 CFR 63 Subpart XXXXXX apply to each new and existing affected source listed and defined in 40 CFR 63.11514(b)(1) through (5) if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.
- b. Pursuant to 40 CFR 63.11514(b)(4), a spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints that contain MFHAP. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning). Affected source(s) subject to the requirements of this paragraph are not subject to the miscellaneous surface coating provisions of 40 CFR 63 Subpart HHHHHH, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources."
- c. Pursuant to 40 CFR 63.11515(b), if you own or operate a new affected source, you must achieve compliance with the applicable provisions in this subpart by July 23, 2008, or upon startup of your affected source, whichever is later.
- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute

period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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 35 Ill. Adm. Code 212.321(c).
- 4. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 5a. Pursuant to 35 Ill. Adm. Code 215.204(k)(2), no owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to 35 Ill. Adm. Code Part 215, delivered to the coating applicator:

<u>Heavy Off-Highway Vehicle Products</u>	<u>kg/l</u>	<u>lb/gal</u>
In the remaining counties		
Extreme performance prime coat	0.42	(3.5)
Extreme performance top coat-air dried	0.52	(4.3)
Final repair coat - air dried	0.58	(4.8)

- b. Pursuant to 35 Ill. Adm. Code 215.301, 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 source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K (Use of Organic Material) shall apply only to photochemically reactive material.
- 6a. This permit is issued based on Spray Booth 1 and Spray Booth 2 not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart M. This is a result 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/year of any combination of such HAPs.

- b. This permit is issued based on Spray Booth 1 and Spray Booth 2 not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH. Pursuant to 40 CFR 63.11514(b)(4), affected source(s) subject to the requirements of this paragraph are not subject to the miscellaneous surface coating provisions of 40 CFR 63 Subpart HHHHHH, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources."
7. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 8a. Pursuant to 35 Ill. Adm. Code 215.206(a), the limitations of 35 Ill. Adm. Code 215 Subpart F (Coating Operations) shall not apply to:
- i. Coating plants in which emissions of volatile organic material as limited by the operating permit will not exceed 22.7 Mg/year (25 tons/year), in the absence of air pollution control equipment; or
 - ii. Coating plants in which the total coating usage does not exceed 9,463 liters/year (2,500 gallons/year);
- b. Pursuant to 35 Ill. Adm. Code 215.206(b), the limitations of 35 Ill. Adm. Code 218 Subpart F shall not apply to touch-up and repair coatings used by a coating source described in 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j); provided that the source-wide volume of such coatings does not exceed 0.95 l (1 quart) per eight-hour period or exceed 209 liters/year (55 gallons/year) for any rolling twelve-month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with 35 Ill. Adm. Code 215.206(c).
- c. Pursuant to 35 Ill. Adm. Code 215.206(d), "touch-up and repair coatings" means, for purposes of 35 Ill. Adm. Code 215.206, any coating used to cover minor scratches and nicks that occur during manufacturing and assembly processes.
- d. Pursuant to 35 Ill. Adm. Code 215.209, no coating line subject to the limitations of 35 Ill. Adm. Code 215.204 is required to meet 35 Ill.

Adm. Code 215.301 or 215.302 after the date by which the coating line is required to meet 35 Ill. Adm. Code 215.204.

- 9a. Pursuant to 40 CFR 63.11516(d), if you own or operate a new or existing spray painting affected source, as defined in 40 CFR 63.11514 (b) (4), "Am I subject to this subpart?," you must implement the management practices in 40 CFR 63.11516(d) (1) through (9) when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.
- i. All spray-applied painting of objects must meet the requirements of 40 CFR 63.11516(d) (1) (i) through (iii). These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart," or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.
- A. Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
- B. All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992". The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
- C. You must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of

these activities, as detailed in 40 CFR 63.11519(c) (5), "Notification, recordkeeping, and reporting requirements".

- ii. All paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the Illinois EPA or USEPA. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002", Revision 0.
- iii. You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in 40 CFR 63.11519(c) (7), "Notification, recordkeeping, and reporting requirements".
- iv. All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.
- v. All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 40 CFR 63.11516(d) (6). The spray application of paint is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11516(d) (6). The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.
- vi. Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by 40 CFR 63.11516(d) (5). The training program must include, at a

minimum, the items listed in 40 CFR 63.11516(d) (6) (i) through (iii).

- A. A list of all current personnel by name and job description who are required to be trained;
 - B. Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in 40 CFR 63.11516(d) (6) (ii) (A) through (D).
 - I. Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
 - II. Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
 - III. Routine spray booth and filter maintenance, including filter selection and installation.
 - IV. Environmental compliance with the requirements of 40 CFR 63 Subpart XXXXXX.
 - C. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in 40 CFR 63.11516(d) (6) (ii) are not required to provide the initial training required by that paragraph to these painters.
- vii. You must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in 40 CFR 63.11519(c) (8), "Notification, recordkeeping, and reporting requirements".
- viii. As required by 40 CFR 63.11516(d) (5), all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in 40 CFR 63.11516(d) (8) (i) and (ii). If your source is a new source, all personnel must be trained and certified no later than January 20, 2009, 180 days after startup, or 180 days after hiring, whichever is later.

Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in 40 CFR 63.11516(d)(6)(ii) satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

- ix. Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of 40 CFR 63.11516 and be re-certified every 5 years.
- 10a. 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.
 - b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the fabric panel filters such that the fabric panel filters are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
 - c. The natural gas fired cure/bake oven shall only be operated with natural gas as the fuel. The use of any other fuel in the oven requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 11a. VOM emissions from and operation of Spray Booth 1 and Spray Booth 2 shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
3.11	24.90	3.11	24.90

These limits are based on the maximum material usage and material balance. VOM and HAP emissions shall be determined from the following equation:

$$E = [\sum(S_j \times d_i \times C_j) - \sum(W_k \times C_k)]/2,000$$

Where:

- E = VOM or HAP emissions (lbs);
- S_j = VOM or HAP-containing materials usage (gallons);
- d_i = Density of coating materials (lbs/gallon);
- C_j = VOM content of the materials (% by weight);

W_k = Certified amount of waste materials sent off for disposal (lbs);
and

C_k = Certified VOM or HAP content of waste materials (% by weight).

- b. This permit is issued based on negligible emissions of particulate matter (PM) from the paint spray booths. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- c. Emissions and operation of the bake oven shall not exceed the following limits:
 - i. Natural Gas Usage: 1.18 mmscf/month, 17.18 mmscf/year.
 - ii. Emissions from the combustion of natural gas:

Pollutant	Emission Factor (lbs/mmscf)	Emissions	
		(Tons/Mo)	(Tons/Yr)
Carbon Monoxide (CO)	84.0	0.07	0.72
Nitrogen Oxides (NO _x)	100.0	0.09	0.86
Particulate Matter (PM)	7.6	0.01	0.07
Sulfur Dioxide (SO ₂)	0.6	0.01	0.01
Volatile Organic Material (VOM)	5.5	0.01	0.05

These limits are based on the maximum firing rate of the oven (2.0 mmBtu/hour), the maximum operating hours (8,760 hours/year), and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from Spray Booth 1 and Spray Booth 2 shall not exceed 0.79 tons/month and 7.90 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of Section 112(g) of the Clean Air Act and the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm.
 - e. Compliance with 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:

equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.

- b. Pursuant to 35 Ill. Adm. Code 215.208(b), transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA.
- 15a. Pursuant to 40 CFR 63.11517(a), visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR Part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.
- b. Pursuant to 40 CFR 63.11517(b), visual determinations of fugitive emissions must be performed in accordance with 40 CFR 63.11517(a) and according to the schedule in 40 CFR 63.11517(b) (1) through (4).
 - i. Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
 - ii. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with 40 CFR 63.11517(b) (1) for 10 days of work day operation of the process, you may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with 40 CFR 63.11517(b) (1).
 - iii. If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with 40 CFR 63.11517(b) (2), you may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly EPA Method 22 in accordance with 40 CFR 63.11517(b) (2).
 - iv. If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with 40 CFR 63.11517(b) (3), you may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly EPA Method 22 in accordance with 40 CFR 63.11517(b) (3).

- 16a. Pursuant to 40 CFR 63.7(g) (3), for a minimum of 5 years after a performance test is conducted, the owner or operator shall retain and make available, upon request, for inspection by the Illinois EPA or USEPA the records or results of such performance test and other data needed to determine emissions from an affected source.
- b. Pursuant to 40 CFR 63.10(b) (1), the owner or operator of an affected source subject to the provisions of 40 CFR Part 63 shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
- c. Pursuant to 40 CFR 63.10(b) (2), the owner or operator of an affected source subject to the provisions of 40 CFR Part 63 shall maintain relevant records for such source of:
 - i. The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards;
 - ii. The occurrence and duration of each malfunction of operation (i.e., process equipment) or the required air pollution control and monitoring equipment;
 - iii. All required maintenance performed on the air pollution control and monitoring equipment;
 - iv. All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
- d. 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.

- 17a. Pursuant to 40 CFR 63.11519(c), you must collect and keep records of the data and information specified in 40 CFR 63.11519(c)(1) through (13), according to the requirements in 40 CFR 63.11519(c)(14).
- i. Maintain information specified in 40 CFR 63.11519(c)(1)(i) through (ii) for each affected source.
 - A. Each notification and report that you submitted to comply with 40 CFR 63 Subpart XXXXXX, and the documentation supporting each notification and report.
 - B. Records of the applicability determinations as in 40 CFR 63.11514(b)(1) through (5), "Am I subject to this subpart," listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.
 - ii. Maintain a record of the information specified in 40 CFR 63.11519(c)(2)(i) through (iii) for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a), "Monitoring requirements".
 - A. The date and results of every visual determination of fugitive emissions;
 - B. A description of any corrective action taken subsequent to the test; and
 - C. The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
 - iii. Maintain a record of the information specified in 40 CFR 63.11519(c)(3)(i) through (iii) for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c), "Monitoring requirements."

- A. The date of every visual determination of emissions opacity; and
 - B. The average of the six-minute opacities measured by the test; and
 - C. A description of any corrective action taken subsequent to the test.
- iv. Maintain a record of the manufacturer's specifications for the control devices used to comply with 40 CFR 63.11516, "What are my standards and management practices?"
 - v. Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with 40 CFR 63.11516(d) (1) (ii) and (iii), "Requirements for spray painting objects in spray booths or spray rooms."
 - vi. Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with 40 CFR 63.11516(d) (3), "Requirements for spray painting of all objects." This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If you have obtained written approval for an alternative spray application system in accordance with 40 CFR 63.11516(d) (2), "Spray painting of all objects," you must maintain a record of that approval along with documentation of the demonstration of equivalency.
 - vii. Maintain certification that each worker performing spray painting operations has completed the training specified in 40 CFR 63.11516(d) (6), "Requirements for spray painting of all objects," with the date the initial training and the most recent refresher training was completed.
 - viii. If you comply with 40 CFR 63 Subpart XXXXXX by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review.
 - ix. Your records must be maintained according to the requirements in 40 CFR 63.11519(c) (14) (i) through (iii).
 - A. Your records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b) (1), "General Provisions". Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
 - B. As specified in 40 CFR 63.10(b) (1), "General Provisions," you must keep each record for 5 years following the date of

each occurrence, measurement, corrective action, report, or record.

- C. You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to 40 CFR 63.10(b)(1), "General Provisions". You may keep the records off-site for the remaining 3 years.

- 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 215.206(c), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall:
 - i. Collect and record the name, identification number, and volume of each touch-up and repair coating, as applied on each coating line, per eight-hour period and per month;
 - ii. Perform calculations on a daily basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for each eight-hour period;
 - iii. Perform calculations on a monthly basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for the month and the rolling twelve-month period;
 - iv. Prepare and maintain at the source an annual summary of the information required to be compiled pursuant to 35 Ill. Adm. Code 215.206(b) on or before January 31 of the following year;
 - v. Maintain at the source for a minimum of three years all records required to be kept under 35 Ill. Adm. Code 215.206(c) and make such records available to the Illinois EPA upon request.
- 20a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the limits in this permit:
 - i. Records addressing use of good operating practices for the fabric panel filters associated with each paint booth:
 - A. Records for periodic inspection of the fabric panel filters associated with each paint booth with date, individual performing the inspection, and nature of inspection; and

- B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Coating usage (gallons/month and gallons/year);
 - iii. Solvent usage (gallons/month and gallons/year);
 - iv. VOM and HAP contents of materials used (percent by weight);
 - v. The densities of materials used (lbs/gallon);
 - vi. Natural gas usage (mmscf/month and mmscf/year); and
 - vii. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM, and HAPs from the source, 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 storage device) 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.
- 21a. Pursuant to 40 CFR 63.7(b)(1), the owner or operator of an affected source must notify the Illinois EPA or USEPA in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow the Illinois EPA or USEPA, upon request, to review and approve the site-specific test plan required under 40 CFR 63.7(c) and to have an observer present during the test.
 - b. Pursuant to 40 CFR 63.7(b)(2), in the event the owner or operator is unable to conduct the performance test on the date specified in the notification requirement specified in 40 CFR 63.7(b)(1) due to unforeseeable circumstances beyond his or her control, the owner or operator must notify the Illinois EPA or USEPA as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the owner or operator of legal responsibility for compliance with any other applicable provisions of 40 CFR Part 63 or with any other applicable Federal, State, or local requirement, nor will it prevent the Illinois EPA or USEPA from implementing or enforcing 40 CFR Part 63 or taking any other action under the Clean Air Act.
 - c. Pursuant to 40 CFR 63.10(d)(1), notwithstanding the requirements in this paragraph or 40 CFR 63.10(e), and except as provided in 40 CFR

63.16, the owner or operator of an affected source subject to reporting requirements under 40 CFR Part 63 shall submit reports to the Illinois EPA or USEPA in accordance with the reporting requirements in the relevant standard(s).

22a. Pursuant to 40 CFR 63.11519(a)(1), if you are the owner or operator of an area source in one of the nine metal fabrication and finishing source categories, as defined in 40 CFR 63.11514, you must submit the Initial Notification required by 40 CFR 63.9(b) "General Provisions," for a new affected source no later than 120 days after initial startup or November 20, 2008, whichever is later. For an existing affected source, you must submit the Initial Notification no later than July 25, 2011. Your Initial Notification must provide the information specified in 40 CFR 63.11519(a)(1)(i) through (iv).

- i. The name, address, phone number and e-mail address of the owner and operator;
- ii. The address (physical location) of the affected source;
- iii. An identification of the relevant standard (i.e., 40 CFR 63 Subpart XXXXXX); and
- iv. A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.

b. Pursuant to 40 CFR 63.11519(a)(2), if you are the owner or operator of an existing affected source, you must submit a notification of compliance status on or before November 22, 2011. If you are the owner or operator of a new affected source, you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later. You are required to submit the information specified in 40 CFR 63.11519(a)(2)(i) through (iv) with your notification of compliance status:

- i. Your company's name and address;
- ii. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart XXXXXX;
- iii. If you operate any spray painting affected sources, the information required by 40 CFR 63.11516(e)(3)(vi)(C), "Compliance demonstration," or 40 CFR 63.11516(e)(4)(ix)(C), "Compliance demonstration," as applicable; and
- iv. The date of the notification of compliance status.

- c. i. Pursuant to 40 CFR 63.11519(b) (1), you must prepare and submit annual certification and compliance reports for each affected source according to the requirements of 40 CFR 63.11519(b) (2) through (7). The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in 40 CFR 63.11519(b) (3).
- ii. Pursuant to 40 CFR 63.11519(b) (2), unless the Illinois EPA or USEPA has approved or agreed to a different schedule for submission of reports under 40 CFR 63.10(a), "General Provisions," you must prepare and submit each annual certification and compliance report according to the dates specified in 40 CFR 63.11519(b) (2) (i) through (iii). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - A. The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.
 - B. Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.
 - C. Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedence has occurred during the year, each annual certification and compliance report must be submitted along with the exceedence reports, and postmarked or delivered no later than January 31.
- iii. Pursuant to 40 CFR 63.11519(b) (4), the annual certification and compliance report must contain the information specified in 40 CFR 63.11519(b) (4) (i) through (iii), and the information specified in 40 CFR 63.11519(b) (5) through (7) that is applicable to each affected source.
 - A. Company name and address;
 - B. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
 - C. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

- iv. Pursuant to 40 CFR 63.11519(b) (5), the annual certification and compliance report must contain the information specified in 40 CFR 63.11519(b) (5) (i) through (iii) for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a), "Monitoring requirements."
 - A. The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
 - B. A description of the corrective actions taken subsequent to the test; and
 - C. The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
- v. Pursuant to 40 CFR 63.11519(b) (6), the annual certification and compliance report must contain the information specified in 40 CFR 63.11519(b) (6) (i) through (iii) for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c), "Monitoring requirements."
 - A. The date of every visual determination of emissions opacity;
 - B. The average of the six-minute opacities measured by the test; and
 - C. A description of any corrective action taken subsequent to the test.
- 23. 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.
- 24a. If there is an exceedance of or a 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 or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. 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:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5407 North University Avenue
Peoria, Illinois 61614

If you have any questions on this permit, please call Mike Dragovich at 217/785-1705.

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

Date Signed: _____

ECB:MJD:jws

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the custom industrial equipment 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 NO_x, PM₁₀ and VOM, and 10 tons/year for any single HAP, and 25 tons/year for any combination of such 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)						Single	Total
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Spray Booths (1 & 2)			0.44	0.44		24.45		
Natural Gas Combustion	0.72	0.86	0.07	0.07	0.01	0.05	----	----
Totals	0.72	0.86	0.51	0.51	0.01	24.50	7.90	19.90