

217/785-1705

CONSTRUCTION PERMIT  
NESHAP SOURCE

PERMITTEE

Rowe Foundry, Inc.  
Attn: Glenn Kuehnel, Foundry Manager  
147 West Cumberland Street  
Martinsville, Illinois 62442

Application No.: 13110053

I.D. No.: 023015AAD

Applicant's Designation:

Date Received: November 25, 2013

Subject: Paint Booths

Date Issued: February 19, 2014

Location: 147 West Cumberland Street, Martinsville

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of two paint booths, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Description

The permit authorizes installation of two paint booths (the "affected units"). The booths will be used to apply coatings to metal castings and will be equipped with filters for control of particulate emissions.

2. Applicability Emission Standards

- a. The affected units are subject to 35 IAC 215.204(j)(2), which provides that no person shall cause or allow the emission of volatile organic material (VOM) from Air Dried Coating of Miscellaneous Metal Parts and Products to exceed 3.5 lbs/gallon of coating material, excluding water and any compounds which are specifically exempted from the definition of volatile organic material, as delivered to the coating applicators.
- b. Each affected unit is subject to 35 IAC 212.321(a), which provides that 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, either alone or in combination with the emission of particulate matter from all other similar new process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). [35 IAC 212.321(a)]

3. Non-Applicability Provisions

- a. This permit is issued based upon this project not constituting a major modification pursuant to the federal rules for Prevention

of Significant Deterioration, 40 CFR 52.21. This is because the project will not be accompanied by significant increases in emissions of NSR pollutants, i.e., 40 tons per year of VOM emissions.

- b. This permit is issued based on the affected units at the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm. This is because the source is operated as a minor source of hazardous air pollutant (HAP) emissions and this project will not change that status.
- c. This permit is issued based on the affected units not being subject to 40 CFR Part 63, Subpart HHHHHH: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. This is because the affected units do not use any coatings that contain target HAP, i.e., compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- d. The affected units, which are subject to the requirements of 35 IAC 215.204, are not required to meet 35 IAC 215.301 or 215.302, pursuant to 35 IAC 215.209.

4. Control Requirements and Work Practices

- a. The Permittee shall follow good operating practices for the filters on the affected units, including periodic inspection, routine maintenance and prompt repair of defects.
- b. The filters shall be in operation at all times when coating is being sprayed in the associated coating line.

5. Production and Emission Limits

- a. VOM usage and emissions, including both coatings and solvents, for the affected units shall not exceed the following limits. Compliance with annual limits 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).

VOM Usage		VOM Emissions	
Tons/Month	Tons/Year	Tons/Month	Tons/Year
4.0	39.2	4.0	39.2

- b. This permit is issued based on negligible emissions of particulate matter from each affected unit. For this purpose, emissions of particulate matter from each affected unit shall not exceed 0.1 lb/hour and 0.44 tons/year.
- c. This permit does not increase the source's permitted emissions of HAPs.

Note: Construction Permit No. 08060049 was issued based on the source being a minor source of HAPs. (See Condition 6(b) of that permit.

6. Testing Requirements

The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 215.105 except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative. [35 IAC 215.208(a)]

7. Recordkeeping Requirements

- a. The Permittee shall maintain records of the following items for the affected units:
  - i. The name and identification number of each coating and cleaning solvent as applied or used.
  - ii. The weight of VOM per volume of each coating, as applied (lb/gallon, minus water and any compounds which are specifically exempted from the definition of VOM).
  - iii. The weight of VOM per volume of each cleaning solvent, as used (lbs/gallon).
  - iv. VOM and HAP usage (tons/month and tons/year), with supporting documentation.
  - v. VOM and HAP emissions (tons/month and tons/year) with supporting documentation.
- b. The Permittee shall address the HAP emissions from the affected units in the source-wide recordkeeping for HAP emissions required by Condition 10(d) of Construction Permit No. 08060049.

8. Reporting Requirements

The Permittee shall notify the Illinois EPA of deviations from the requirements of this permit within 30 days of such occurrence. Reports shall describe the deviation, the probable cause of such deviation, the corrective actions taken, and any preventive measures taken.

9. Authorization to Operate

The Permittee may operate the affected units under this construction permit until final action is taken on the Permittee's application for a Clean Air Act Permit Program (CAAPP) permit.

If you have any questions on this permit, please contact Jason Schnepf at 217/524-3724.

Raymond E. Pilapil  
Acting Manager, Permit Section  
Division of Air Pollution Control

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

REP:JMS:psj

cc: Region 3  
Lotus Notes