

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

T/CCI Manufacturing, L.L.C.  
Attn: Monte Lange  
2120 North 22<sup>nd</sup> Street  
Decatur, Illinois 62526

Application No.: 99030033

I.D. No.: 115015AJV

Applicant's Designation:

Date Received: February 1, 2005

Subject: Air Conditioner Compressor Manufacturing Plant

Date Issued:

Expiration Date: (five years)

Location: 2120 North 22<sup>nd</sup> Street, Decatur, Macon County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two cold degreasers, one compressor leak-testing tank, one paint booth controlled by water curtain and phenolic resin molding press 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/yr for VOM, 10 tons/yr for a single HAP and 25 tons/yr 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.
  - ii. This permit is issued based upon the source 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 Mmmm. This is consequence 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, being established prior to the Compliance Date for existing sources listed in 40 CFR 63.3883(b).
- 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) issued for this location.

- 2a. 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 the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- d. Pursuant to 35 Ill. Adm. Code 212.321(a), 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 subsection (c) of 35 Ill. Adm. Code 212.321.
- 3a. Pursuant to 35 Ill. Adm. Code 215.182(a): Operating Procedures, no person shall operate a cold cleaning degreaser unless:
  - i. Waste solvent shall be stored in covered containers only and not disposed of in a manner that more than 20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere.
  - ii. The cover of the degreaser is closed when parts are not being handled; and
  - iii. Parts are drained until dripping ceases.
- b. Pursuant to 35 Ill. Adm. Code 215.182(b): Equipment Requirements, no person shall operate a cold cleaning degreaser unless:
  - i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights, or a powered system if:

- A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38° C (100° F);
  - B. The solvent is agitated; or
  - C. The solvent is heated above ambient room temperature;
- ii. The degreaser is equipped with a facility for draining cleaned parts. The drainage facility shall be constructed so that parts are enclosed under the cover while draining unless:
- A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38° C (100° F); or
  - B. An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.
- iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38° C (100 1/4° F) or if the solvent is heated above 50° C (120° F) or its boiling point:
- A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
  - B. Any other equipment or system of equivalent emission control as approved by the Agency. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
- c. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) 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 shall apply only to photochemically reactive material.
- 4a. Pursuant to 35 Ill. Adm. Code 215.204(j)(2), Nono 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>kg/l</u>	<u>lb/gal</u>
Air dried coating	0.42	(3.5)

- 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 l/yr (55 gal/yr) 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.
- 5a. VOM usage and emissions from the coating operations shall not exceed 7.0 tons/month and 67.2 tons/yr.
- b. VOM usage and emissions of the degreasing and leak-testing operations shall not exceed 3.0 tons/month and 24.2 tons/yr.
  - c. This permit is issued based on negligible emission of the volatile organic materials from the phenolic resin molding press. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
  - d. The emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single hazardous air pollutant or 25 tons per year of any combination of such hazardous air pollutants, 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 hazardous air pollutants from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
  - e. The VOM/HAP emissions shall be determined from the following equation:  
$$E = \sum(M_i \times V_i) / 2,000 - \sum(W_j \times V_j), \text{ where:}$$
    - E - VOM/HAP emissions (tons);
    - $M_i$  - VOM/HAP-containing material usage (gallons);
    - $V_i$  - VOM/HAP content of material (lb/gal);
    - $W_j$  - certified amount of waste shipped-off (tons);
    - $V_j$  - certified VOM/HAP content of the waste (fraction).

These limits are based on the maximum production rate and material balance calculations.

6a. The emission of particulate matter (PM) from paint booth shall not exceed 0.2 ton/month and 2.0 ton/year.

b. PM emission shall be calculated using the following equation:

$$E = [P_i \times S_i] \times OS \times (1 - CE)/2,000 \quad \text{where}$$

E - PM emission (tons);

$P_i$  - Coating usage (gal);

$S_i$  - Solids content of coating used (lb/gal);

OS - Overspray (assumed 60%);

CE - Control Efficiency (assumed 90%)

These limits are based on the maximum production rate, coatings properties and control equipment manufacturer's guaranteed efficiency.

7. 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 (12 month total).

8a. 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.

- b. 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; and
- c. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. The name and identification number of each coating as applied each day;
  - ii. 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;
  - iii. Coating and solvent usage (gal/month, gal/year);
  - iv. Coating and solvent VOM and HAP content (lb/gal); and
  - v. Monthly and annual PM, VOM, and HAP emissions with supporting calculations (tons/month and tons/year).
9. 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) 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.

- 10a. 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 Notify the Illinois EPA in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 l (1 quart) per eight-hour period or exceeds 209 l/yr (55 gal/yr) for any rolling twelve-month period within 30 days after any such exceedence. Such notification shall include a copy of any records of such exceedence.
- b. If there is an exceedence 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 Agency's Compliance and Enforcement Section in Springfield, Illinois within 30 days after the exceedence. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedences or deviation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance and Enforcement 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

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

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

DES:VJB:

cc: IEPA, FOS Region 3  
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the Air Conditioner Compressor 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 (i.e., 100 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.

<u>Emission Units</u>	E M I S S I O N S			
	<u>VOM</u>	<u>PM</u>	<u>Single HAP</u>	<u>Total HAP</u>
Two Coating Booths	67.2	2.0		
Degreasing and Testing Operations	24.2			
Phenolic Resin Molding Press	0.4			
Plant-wide Total	91.8	2.0	<10	<25

DES:VJB: