

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Rollex Corporation  
Attn: Jerry Simko - Coil Coating Manager  
2001 Lunt Avenue  
Elk Grove Village, Illinois 60007

<u>Application No.:</u> 04080076	<u>I.D. No.:</u> 031440ALU
<u>Applicant's Designation:</u> COIL COATER	<u>Date Received:</u> August 30, 2004
<u>Subject:</u> Coater	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 800 Chase Avenue, Elk Grove Village, Cook County, 60007	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a coil coating line, thermal oxidizer, rollforming lines, two 6,000 gallon coating storage tanks and natural gas fired combustion equipment 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. This federally enforceable state operating permit (FESOP) is issued 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 a single hazardous air pollutant (HAP) and 25 tons/year for totaled 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. This permit is issued based upon the plant not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units). This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year.
  - iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System. The maximum emissions of this sources, as limited by the conditions of the 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 coil coating line with thermal oxidizer is subject to the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60, Subparts A and TT. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
  - b. Pursuant to 40 CFR 60.462(a)(3), on and after the date on which 40 CFR 60.8 requires a performance test to be completed, each owner or operator subject to 40 CFR 60 Subpart TT shall not cause to be discharged into the atmosphere more than 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency.
  - c. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 3a. 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. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
  - 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 212.309(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.

- e. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with this Subpart, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- f. 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 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.
- 4. Pursuant to 35 Ill. Adm. Code 214.301, 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 218.121(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent

with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).

- b. Pursuant to 35 Ill. Adm. Code 218.121(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.121 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- c. Pursuant to 35 Ill. Adm. Code 218.204(d), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 218.206 shall be used to calculate emission limitations for determining compliance by add on controls, credits for transfer efficiency, emissions trades and cross line averaging.) The emission limitations are as follows:

	kg/l	lb/gal
Coil Coating	0.20	(1.7)

- d. Pursuant to 35 Ill. Adm. Code 218.207(a), any owner or operator of a coating line subject to 35 Ill. Adm. Code 218.204 may comply with 35 Ill. Adm. Code 218.207, rather than with 35 Ill. Adm. Code 218.204, if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), or (k) of (depending upon the source category) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in 35 Ill. Adm. Code 218.105 and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(e); and the control device is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d) and the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use. A capture system and control device, which does not demonstrate compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), or (k) may be used as an alternative to compliance with 35 Ill. Adm. Code 218.204 only if the alternative is approved by the Illinois EPA and approved by the USEPA as a SIP revision.

- e. Pursuant to 35 Ill. Adm. Code 218.207(b)(1), the coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency.
- f. Pursuant to 35 Ill. Adm. Code 218.207(c), no owner or operator of a coating line subject to only one of the emission limitations from among 35 Ill. Adm. Code 218.204(a)(1), (a)(4), (c), (d), (e), (f), or (i) and equipped with a capture system and control device shall operate the subject coating line unless the requirements in 35 Ill. Adm. Code 218.207(b)(1) or (b)(2) are met. No owner or operator of a coating line subject to 35 Ill. Adm. Code 218.204(a)(2) or 218.204(a)(3) and equipped with a capture system and control device shall operate the coating line unless the owner or operator demonstrates compliance with such limitation in accordance with the topcoat protocol referenced in 35 Ill. Adm. Code 218.105(b).
- g. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- h. Pursuant to 35 Ill. Adm. Code 218.301, 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 unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.
- 6a. The thermal oxidizer shall be in operation at all times when the associated emission unit(s) is in operation and emitting air contaminants.
- b. The thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation.
- c. The thermal oxidizer shall be designed and operated such that it results in a 99% overall emission reduction for the coil coating line.
- 7a. Emissions and operation of the Coil Coating Line with thermal oxidizer shall not exceed the following limits:

<u>Coating</u>	<u>VOM Usage</u>		<u>Minimum Overall Control Efficiency</u>	<u>VOM Emissions</u>	
	<u>(lb/Hr)</u>	<u>(Ton/Yr)</u>	<u>(%)</u>	<u>(Lbs/Hr)</u>	<u>(Ton/Yr)</u>
Primer	73.0	237.3	99	0.73	2.37
Finish	158.0	513.5	99	1.58	5.14
CBS	84.0	54.6	99	0.84	0.55
Backer	17.0	44.2	99	0.17	0.44
Chemical Treatment	0.23	0.7	0	0.23	0.70
Water Quench*			0	0.40	1.30
Diluent	675.0	1,350.0	99	6.75	0.02
Clean-Up Solvent	1,688.0	3,375.0	99	16.88	0.02
				Total	10.54

\* Determined through emission testing

These limits are based on VOM usage = VOM content \* usage, and complete volatilization of the VOM content.

- b. The operations and emissions of the rollforming lines shall not exceed the following limits:

<u>Lubricant Usage</u>	<u>Lubricant VOM Content</u>	<u>VOM Emissions</u>
<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>	<u>(lbs VOM/Gallon)</u>
727	5,813	4.61
		13.4

These limits are based on the maximum usage of rollforming lubricant.

- c. The VOM emissions from the two coating storage tanks (combined) shall not exceed 0.002 tons/month and 0.016 tons/year. These limits are based on the submitted maximum emission rate (0.0018 lbs/hour per tank) and maximum operating hours (8,760 hours/year).
- d. Operation and emissions of the natural gas fired combustion equipment including the thermal oxidizer shall not exceed the following limits:
- i. Natural Gas Usage: 30 mmscf/month and 260 mmscf/year
  - ii. Emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter (PM), volatile organic material (VOM), and sulfur dioxide (SO<sub>2</sub>):

<u>Pollutant</u>	Emission	Emissions	
	Factor (Lbs/mmscf)	(Tons/Mo)	(Tons/Yr)
Nitrogen Oxides (NO <sub>x</sub> )	100	1.50	13.00
Carbon Monoxide (CO)	84	1.26	10.92
Particulate Matter (PM)	7.6	0.15	0.99
Volatile Organic Material (VOM)	5.5	0.09	0.72
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.08

These limits are based on the the maximum natural gas usage and standard emission factors for uncontrolled natural gas combustion in small boilers with less than 100 mmBtu/hour of heat input (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, March, 1998).

8. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 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 requirement to obtain a CAAPP permit from the Illinois EPA.
9. Compliance with the 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).
10. Pursuant to 40 CFR 60.463(c)(2), the owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/l of coating solids applied. An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under 40 CFR 60.462(a)(2) or (3).
  - i. Determine the overall reduction efficiency (R) for the capture system and control device. For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in 40 CFR 60.463(c)(2)(i)(A), (B), and (C). In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in 40 CFR 60.463(c)(2)(i)(A), (B), and (C), shall be repeated when directed by the Illinois EPA or USPEA or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.
    - A. Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using Equation 5 of 40 CFR 60 Subpart TT.

- B. Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by Equation 6 of 40 CFR 60 Subpart TT.
- C. Determine overall reduction efficiency (R) using the following equation:

$$R = EF$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows.

- ii. Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in 40 CFR 60.463(c)(1)(i)(A), (B), and (C).
  - iii. Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:  
$$N = G(1 - R)$$
  - iv. If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.
- 11a. 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:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA

Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
  - b. Testing required by Conditions 13 and 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 12a Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
  - c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
  - d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
  - e. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the

applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

13. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
14. Pursuant to 40 CFR 60.464(c), if thermal incineration is used, each owner or operator subject to the provisions of 40 CFR 60 Subpart TT shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with 40 CFR 60.462(a)(2), (3), or (4). This device shall have an accuracy of  $\pm 2.5^{\circ}\text{C}$  or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than  $28^{\circ}\text{C}$  ( $50^{\circ}\text{F}$ ) below the temperature at which compliance with 40 CFR 60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of  $\pm 2.5^{\circ}\text{C}$  or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet temperature falls more than  $28^{\circ}\text{C}$  ( $50^{\circ}\text{F}$ ) below the temperature at which compliance with 40 CFR 60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.
15. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(ii), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must

monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.

- 16 Pursuant to 40 CFR 60.465((e)), each owner or operator subject to the provisions of 40 CFR 60 Subpart TT shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.
17. 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.
- 18a. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by

maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.

- b. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(2) or (a)(3) and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record all of the following information for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line.
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
- c. Pursuant to 35 Ill. Adm. Code 218.211(e)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g) or (h) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
  - i. Control device monitoring data.
  - ii. A log of the operating time for the capture system, control device, monitoring equipment and the associated coating line.
  - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- 19a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit:
  - i. Coating usage (tons/month and tons/year);
  - ii. Solvent usage (lbs/month and tons/year);
  - iii. Natural gas usage (mmscf/month and mmscf/year);
  - iv. Lubricant usage (gallons/month and tons/year);
  - v. VOM contents of materials used; and
  - vi. Monthly and annual emissions of VOM, CO, NO<sub>x</sub>, PM, SO<sub>2</sub> and HAPs, 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) 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.
20. If there is an exceedance of or 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
21. Pursuant to 40 CFR 60.465(c), following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Illinois EPA or USEPA every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Illinois EPA or USEPA semiannually.
- 22a. Pursuant to 35 Ill. Adm. Code 218.211 (C) (3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 of and complying by means of 35 Ill. Adm. Code 218.204 shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), respectively. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), respectively.
- b. Pursuant to 35 Ill. Adm. Code 218.211(e)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g) or (h) shall notify the Illinois EPA in the following instances:

- i. Any record showing violation of 35 Ill. Adm. Code 218.207 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(c) or (d), respectively.
23. 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  
9511 West Harrison  
Des Plaines, Illinois 60016

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

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

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

ECB:DWH:jws

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this source 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 well below the levels, (e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled 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 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)						<u>Single HAP</u>	<u>Total HAPs</u>
	<u>VOM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>PM</u>	<u>SO<sub>2</sub></u>			
Coal Coating Line	10.540							
Rollforming Line	13.400							
2 Storage Tanks	0.016							
Natural Gas Fired								
Combustion Equipment	<u>0.720</u>	<u>13.0</u>	<u>10.92</u>	<u>0.99</u>	<u>0.08</u>			
Totals	<u>24.676</u>	<u>13.0</u>	<u>10.92</u>	<u>0.99</u>	<u>0.08</u>	<u>9.0</u>	<u>22.5</u>	

DWH:jws