

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Greif Packaging LLC  
Attn: Nick Sheets  
386 Greif Parkway  
Delaware, Ohio 43015

Application No.: 09020052

I.D. No.: 031003ABA

Applicant's Designation:

Date Received: February 25, 2009

Subject: Water-based paint booth

Date Issued:

Location: 4300 West 130th Street, Alsip

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of one water-based paint booth on the heavy gauge steel drum line, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 New Paint Booth on Heavy Gauge Steel Drum Line

Control: Filter and Thermal Oxidizer

1.1.1 Description

The heavy gauge steel drum line manufactures large steel drums with nominal capacities up to 65 gallons. From the fabricating portion of the drum line, unfinished steel drums will enter the new water-based paint booth. Using electrostatic spray guns, the outside of the drum will be painted with protective coating. The painted drum will then move to an existing oven where the coating is cured. The Permittee expects the new paint booth will replace an existing solvent-based paint booth on the line. (This permit does not alter applicable requirements for this existing paint booth).

The new booth will have filters for particulate controls. The emissions of volatile organic material (VOM) from curing of coating will be controlled by thermal oxidizer system that controls the paint oven. (This permit does not account for or rely upon the control of the oven to reduce VOM emissions).

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Water based paint booth	Exterior coating of heavy gauge steel drums, with curing of coating by existing oven	Filter

1.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected spray booth for the purpose of this unit-specific condition is the new spray booth and associated curing oven described in Conditions 1.1.1 and 1.1.2.
- b.
  - i. The coating operations at the source, including the affected spray booth, are subject to 40 CFR Part 63, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants for Surface Coatings of Miscellaneous Metal Parts and Products, because the source is a major source of HAP emissions as defined in 40 CFR 63.2. The Illinois EPA is administering NESHAP in Illinois on behalf of the USEPA under a delegation agreement.
  - ii.
    - A. Pursuant to 40 CFR 63.3880 and 63.3890(b)(1), the organic HAP emissions from the coating operations at the source that are subject to the NESHAP, including the affected spray booth, shall be no more than 2.6 lb organic HAP emitted per gallon of coating solids used during each 12-month compliance period.
    - B. Pursuant to 40 CFR 63.3891, the Permittee must include all coatings (as defined in 40 CFR 63.3981), thinners and/or other additives, and cleaning materials used in the operations that are subject to the NESHAP when determining whether the organic HAP emission rate is equal to or less than 2.6 lb per gallon of coating solids.
  - iii. Pursuant to 40 CFR 63.3881, the Permittee is also subject to the general requirements 40 CFR 63, Subpart A (40 CFR 63.1 to 63.15). Table 2 of 40 CFR 63, Subpart Mmmm lists the specific applicable requirements of 40 CFR Subpart A.
- c. The affected spray booth is subject to 35 IAC 218.204(j)(2)(B) for Miscellaneous Metal Parts and Products Coatings for extreme performance coatings (baked) which provides that no owner or operator of coating line that applies extreme performance coating to miscellaneous metal parts and products shall apply at any time any coating in which the VOM content exceeds 0.40 kg per liter or 3.3 lbs per gallon 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 the coating applicator.

Compounds which are specifically exempted from the definition of VOM should also be treated as water and excluded from the volume coating for the purpose of

calculating the VOM content of applied coatings, "less water" part of the coating composites.

- d. The affected spray booth 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 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 IAC 212.321(c) [35 IAC 212.321(a)].

1.1.4 Non-Applicability Provisions:

- a. This permit is issued based on this project not constituting a major modification subject to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 or 35 IAC Part 203 Major Stationary Sources Construction and Modification (MSSCAM). This is a consequence of less than significant increases in annual emissions of PSD and MSSCAM pollutants resulting from the affected paint booth. (See Conditions 1.1.6(a) and (b).)
- b. The affected paint booth is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material which excludes coating lines subject to 35 IAC 218.204 (Condition 1.1.3(c)) from 35 IAC 218.301.

1.1.5 Operational and Production Limits and Work Practices

- a. i. Usage of coatings and cleanup solvents on the affected spray booth shall not exceed the following limits:

<u>Gallons/Month</u>	<u>Gallons/Year</u>
8,800	88,000

Compliance with these limits shall be, excluding the volume of water and exempt compound contained in the coating.

- ii. Compliance with the above annual limit and other annual limits in this permit shall be determined from a running total of 12 months of data.
- b. The curing oven associated with the affected spray booth shall only be operated with natural gas as the fuel.
- c. i. The Permittee for the affected spray booth shall operate, maintain, and replace the filters for the

affected spray booth in a manner consistent with good air pollution control practice.

- ii. An adequate inventory of spare filters shall be maintained.

1.1.6 Emission Limitations

- a. Emissions of VOM from the affected spray booth(including emissions from use of clean up solvents)shall not exceed the following limits:

<u>Tons/Month</u>	<u>Tons/Year</u>
3.9	39.0

- b. This permit is issued based on minimal emissions of particulate matter (PM) from the affected spray booth. For this purpose, PM emissions shall not exceed 0.25 lb/hour and 1.1 tons/year.

1.1.7 Testing Requirements

- a. Upon request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on affected spray booth shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
- b. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);
- c. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 1.1.9(a) directly reflect the application of such material and separately account for any additions of solvent [35 IAC 218.105(a)].

1.1.8 Inspection Requirements

The Permittee shall visually inspect the filters on a regular basis in order to confirm proper placement of the filters and absence of leaks and ensure timely replacement.

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected paint booth, which records shall be retained for five years, as specified by Condition 9.6.3 of the source's CAAPP Permit, 95100038.

- a. For the affected coating line:

- i. The name and identification number of each coating as applied on the affected coating line;
  - ii. The usage of each coating, in units of gallons/month and gallons/year;
  - iii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each month on the affected coating line.
  - iv. VOM emissions from the use of coatings in tons/month and tons/year.
- b. The following information related to cleanup solvents:
  - i. The name and identification number of each cleanup solvent used;
  - ii. The amount of each cleanup solvent used, in units of gallons/month and gallons/year;
  - iii. The weight of VOM per volume of each cleanup solvent (minus water and any compounds which are specifically exempted from the definition of VOM) used; and
  - iv. VOM emissions from the use of cleanup solvents in tons/month and tons/year.
- c. Records of the testing of VOM of each coating and cleaning solvent as tested pursuant to Condition 1.1.7, which include the following:
  - i. Identification of material tested;
  - ii. Results of analysis (lbs VOM/gallon, less water and exempt compounds);
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.
- d. Amount (gallons/month and gallons/year) and VOM content (lbs VOM/gallon) of paint and solvent waste collected and shipped for off-site disposal.
- e. The VOM emissions of the affected coating line (tons/month and tons/year).
- f. Results of filter inspections and dates of replacements.

#### 1.1.10 Reporting Requirements

- a. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing deviations of an affected coating line with Conditions 1.1.3(c) within 30 days of such an occurrence.
- b. The Permittee shall promptly notify the Illinois EPA, of other deviations of an affected coating line with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

1.1.11 Operational Flexibility

The Permittee is authorized to make the following physical or operational change with respect to the affected spray booth without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this line with various VOM contents provided that the affected coating line remain in compliance.

- 1.1.12 The Permittee is authorized to operate the affected spray booth under this permit until the next issuance of the CAAPP permit. This condition supersedes Standard Condition 6.

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

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

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

ECB:SRS:psj

cc: Region 1