

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
RENEWAL

PERMITTEE

E. D. Etnyre and Company
Attn: Mr. John Hays
1333 South Daysville Road
Oregon, Illinois 61061

Application No.: 91010037 I.D. No.: 141817AAQ
Applicant's Designation: SPRYCTOP05 Date Received: September 27, 2005
Subject: Surface Coating
Date Issued: April 7, 2006 Expiration Date: April 7, 2011
Location: 1333 South Daysville Road, Oregon

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three spray paint booths, one curing oven, one spray bake oven, a welding operation, and a natural gas-fired forge 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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for a single HAP, 25 tons/year for total HAPs, and 100 tons/year for volatile organic material). 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.
- 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.
2. Pursuant to Ill. Adm. Code 215.204(j) (3), the VOM content of the coating used in the three (3) spray paint booths and spray bake oven may not exceed 3.5 lb/gallon (minus water and any other compound specifically exempted from the definition of VOM).
- 3a. Operation and emissions of hazardous air pollutants (HAP) and volatile organic material (VOM) from the three spray paint booths, spray bake oven and welding operation not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>E M I S S I O N S</u>				<u>VOM</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Single HAP (Toluene)</u>		<u>Combined HAPs</u>		<u>(T/Mo)</u>	<u>(T/Yr)</u>
			<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Coating Systems	4,430	44,300	0.27	2.67	1.34	13.47	6.63	66.24
Adhesion Promoter	198	1,1980	----	----	----	----	0.63	6.31
Clean-Up Solvents	533	5,331	0.64	6.37	0.82	8.18	0.78	7.81
Welding Operation	----	----	----	----	----	2.25	----	----
			Totals	9.04		23.90		80.36

- b. This table defines the potential emissions of HAPs and VOM and is based upon the maximum actual emissions resulting from the maximum coating and cleanup solvent usage, the average single HAP and total HAP contents, and the maximum allowable VOM content for the coating. Emissions from the welding operation is based on AP-42 emission factors.
- c. Compliance with the annual limits of this condition shall be determined from a running total of 12 months of data.
- 4. Emissions and operation of the curing oven shall not exceed the following limits:

Maximum Firing Rate (mmBtu/Hour)	E M I S S I O N S			
	NO _x (Tons/Month)	(Tons/Year)	CO (Tons/Month)	(Tons/Year)
2.4	0.1	1.0	0.1	0.9

These limits are based on standard AP-42 emission factors and continuous operation (8,760 hours/year). Compliance with annual limits shall be determined from a running total of 12 months of data.

- 5. This permit is issued based on negligible emissions of nitrogen oxides, carbon monoxide and volatile organic material from the natural gas fired forge. For this purpose emissions of each contaminant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- 6. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. 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.
- 7a. Within 90 days of a written request from the Agency, tests shall be performed which will allow evaluation of the representative coatings "as applied" in order to determine compliance with the requirements of Special Condition Nos. 2 and 3.
- b. These tests shall be performed by an approved independent laboratory by the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 215.105.
- c. The submitted data shall include the following:
 - i. The VOM content of the representative coatings (minus water and exempt compounds) "as applied" (pounds per gallon);

- ii. The HAP content of the representative coatings (minus water) "as applied" (pounds per gallon);
 - iii. A justification why the coatings are representative;
 - iv. A description of the sampling procedures; and
 - v. Documentation for the analysis.
8. The Final Report(s) for all tests shall be submitted within 180 days after the date of the test. The Final Report shall include as a minimum:
- a. General information describing the test, including the name and identification of the emission source which was tested, date of test, name of personnel performing the tests, and Agency observers, if any;
 - b. A summary of results;
 - c. Description of test procedures, including description of test equipment, and test schedule;
 - d. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
9. The Permittee shall maintain records of the following items for the source:
- a. The name and identification number of each coating as applied;
 - b. The weight of VOM per volume of each coating (minus water any compounds which are specifically exempted from the definition of VOM) as applied each month;
 - c. The weight of HAPs per volume of each coating (minus water) as applied each month;
 - d. The usage of coatings in the three spray paint booths, gallons/month and gallons/year (running total);
 - e. The usage of clean-up solvent in the three spray paint booths, gallons/month and gallons/year (running total);
 - f. The amount of clean-up solvent recovered from the three paint spray booths, gallons/month and gallons/year (running total);
 - g. Emissions of HAPs, tons/month and tons/year (running total); and
10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three 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.

11. If there is an exceedance of 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. 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 violation and efforts to reduce emissions and future occurrences.
12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system 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
5415 North University
Peoria, Illinois 61614

It should be noted that this permit incorporates Construction Permit #05100049 to add one spray bake oven and increase emissions due to increased production.

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

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

DES:GMK:psj

cc: FOS Region 2

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the 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 below the levels, e.g., 10 tons/year of any single HAP, 25 tons/year of total HAPs, and 100 tons/year OF VOM 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>Material/Process</u>	E M I S S I O N S				
	<u>NO_x</u> <u>(Ton/Yr)</u>	<u>CO</u> <u>(Ton/Yr)</u>	<u>VOM</u> <u>(Ton/Yr)</u>	<u>Single HAP</u> <u>(Toluene)</u> <u>(Ton/Yr)</u>	<u>Combined</u> <u>HAPs</u> <u>(Ton/Yr)</u>
Coating Systems			66.24	2.67	13.47
Adhesion Promoter			6.31		
Clean-Up Solvents			7.81	6.36	8.18
Welding Operation					2.25
Curing Oven	1.00	0.44	0.44		
Natural Gas Fired Forge	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>		
Totals:	<u>1.44</u>	<u>0.88</u>	<u>81.24</u>	<u>9.03</u>	<u>23.90</u>

GMK:psj