

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

American Buildings Company  
Attn: Terry Kuper  
Highway 24 East  
El Paso, Illinois 61738

Application No.: 94060039

I.D. No.: 113816AAC

Applicant's Designation:

Date Received: February 14, 2006

Subject: Metal Prefabricated Buildings Manufacturing Plant

Date Issued: June 8, 2006

Expiration Date: June 8, 2011

Location: Highway 24 East, El Paso

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two paint booths controlled by individual dry filters and metal forming operations 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., 100 tons/year for VOM, 10 tons/year for a single HAP and 25 tons/year 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.
- 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.
2. The coating booths are subject to and shall comply with the volatile organic materials (VOM) emission limitations of 35 Ill. Adm. Code Part 215, Subpart F: Coating Operations. Compliance with the requirements of this subpart is achieved through the use of compliance coating pursuant to 35 Ill. Adm. Code 218.204(j)(2): the VOM content of the coatings, as applied, shall not exceed 3.5 lbs/gallon excluding water and any compounds which are specifically exempted from the definition of VOM.
3. 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.

- 4a. VOM usage and emissions of the coating operations shall not exceed 11.6 tons/month and 68.9 tons/year.
- b. VOM usage and emissions of the metal forming operations shall not exceed 4.8 tons/month and 28.4 tons/year.

The VOM and HAP emissions shall be calculated using the following equation:

$$E = [\sum P_i \times C_i] / 2,000$$

where

E - VOM/HAP emissions (tons);

P<sub>i</sub> - coating, solvent and lubricating oil usage (gallons);

C<sub>i</sub> - VOM/HAP content of raw material P<sub>i</sub> used (lbs/gallon);

Compliance with annual limits shall be determined from a running total of 12 months of data.

- 5. The emission of particulate matter (PM) from paint booths shall not exceed 0.2 tons/month and 1.0 tons/year.

PM emission shall be calculated using the following equation:

$$E = [\sum P_i \times S_i] \times OS \times (1 - CE),$$

where

E - PM emission (tons);

P<sub>i</sub> - Coating usage (gallons);

S<sub>i</sub> - Solids content of coating used (lbs/gallon);

OS - Overspray (assumed 60%);

CE - Control Efficiency (assumed 99%)

Compliance with annual limits shall be determined from a running total of 12 months of data.

- 6. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to

minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

7. The Permittee shall maintain monthly records of the following items:
  - a. The name and identification number of each coating as applied each day;
  - b. 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;
  - c. Coating and clean-up solvent usage (gallons/month, gallons/year);
  - d. Coating and clean-up solvent VOM and HAP content (lbs/gallon);
  - e. Lubricating oil usage (gallons/month, gallons/year) and its VOM and HAP content (lbs/gallon); and
  - f. VOM and HAP emission calculations (tons/month, tons/year).
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and 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 request for records during the course of a source inspection.
9. 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 Agency's Compliance and Enforcement 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 exceedances or violation and efforts to reduce emissions and future occurrences.
10. 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 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:

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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:psj

cc: IEPA, FOS Region 3  
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the Metal Prefabricated Buildings 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, 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 (Tons/Year)			
	<u>VOM</u>	<u>PM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Two Coating Booths	68.9	1.0	< 10	< 25
Metal Operations	<u>24.8</u>			
Totals	<u>97.3</u>	<u>1.0</u>	<u>&lt; 10</u>	<u>&lt; 25</u>

DES:VJB:psj