

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NESHAP -- RENEWAL

PERMITTEE

Castle Metal Finishing Corporation
Attn: Patrick Schlifka
4631 North 25th Street
Schiller Park, Illinois 60176

Application No.: 73032044 I.D. No.: 031285ACE
Applicant's Designation: CN010429 Date Received: October 30, 2000
Subject: Degreasing and Metal Finishing
Date Issued: Expiration Date:
Location: 4631 North 25th Street, Schiller Park

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of the vapor degreaser, one decorative chrome plating tank, passivation tank, aluminum desmut and rinse tank, rack strip tank, brite dip tank, alkaline cleaning tank, three copper plating tanks, two cadmium plating tanks, nickel stripping tank, three acid pickling tanks, two acid pickling rinse tanks, caustic etch rinse tank, caustic etch tank, five electrocleaning tanks, two nickel plating lines, two tin/lead plating tanks, four tin plating tanks, four zinc plating tanks, descaling tank, and alkaline spray cleaner tank 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 potential emissions of air pollutants from the source to less than major source threshold, (i.e., less than 10 tons per year of any single hazardous air pollutant and less than 25 tons per year of a combination of all hazardous air pollutants, 25 tons per year of volatile organic material (VOM)). As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- 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. This permit is issued based on the temperature of all hydrochloric acid baths used for pickling not exceeding 100°F, thereby exempting such sources from the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart CCC for Steel Pickling pursuant to 40 CFR 63.1155(a)(1).
- b. Usage and emissions of hydrochloric acid (HCl) shall not exceed

Usage
(TPM) (TPY)

HCl Emissions
(TPM) (TPY)

1.0

9.5

0.05

0.5

These limits are based on the amount of HCl purchased per year minus the amount shipped off-site. Compliance shall be determined from a running total of the previous 12 months data.

- c. The Permittee shall keep monthly records of the amount of HCl purchased and shipped off-site.
- d. This permit is issued based on emission of volatile organic material (VOM) from each hydrochloric acid bath not exceeding 8 lb/hr pursuant to 35 Ill. Adm. Code 218.301.
- 3. The decorative chromium electroplating tank is subject to 40 CFR Part 63, Subpart N - National Emission Standards for Decorative Chromium Electroplating Tanks. The Illinois EPA is administering this regulation in Illinois on behalf of the United States EPA under a delegation agreement.
- 4a. The decorative chromium electroplating tank using a fume suppressant containing a wetting agent shall not exceed the following limits pursuant to 40 CFR 63.342(d)(2):

<u>Equipment</u>	<u>Surface Tension</u> <u>(dynes/cm)</u>
Decorative Chromium Electroplating Tank	45

This limit is National Emissions Standard for chromium electroplating tank(s), 40 CFR Part 63, Subpart N. Compliance with this limit shall be determined from ongoing compliance monitoring requirements, as required by Condition 9(h).

- b. The Permittee shall be in compliance with 40 CFR Part 63, Subpart N - National Emission Standard for chromium electroplating tank(s) immediately after startup.
- 5. Pursuant to 40 CFR 63.342(f)(3)(i)(C), the Permittee shall implement the work practice requirements for chrome electroplating tanks(s). The Permittee shall submit the work practice standards implemented for chrome electroplating tank(s). The work practice standard shall address at least the following:
 - a. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan.
 - b. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.
 - c. Operation and maintenance requirements established pursuant to

section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

- d. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source.

- 6a. Pursuant to 40 CFR 63.342(f)(3), the Permittee shall develop and implement an operation and maintenance (O & M) Plan.
- i. Description of the electroplating tank in use.
 - ii. A checklist to document the operation and maintenance of the electroplating tank.
 - iii. Procedure to follow to ensure that the electroplating tank malfunctions due to poor maintenance or other preventable conditions does not occur.
 - iv. Procedure for identifying malfunctions and for implementing corrective actions.
 - v. The O & M plan shall incorporate proposed work practice standards. These proposed work practice standards shall be submitted to the Illinois EPA for approval as part of the submittal required under 40 CFR 63.343(d).
 - vi. The plan shall specify procedures to be followed to ensure that the electroplating tank malfunctions due to poor maintenance or other preventable conditions do not occur.
 - vii. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices (if any), and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.
 - viii. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.
 - ix. If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the owner or operator shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the vent, unless the owner or operator makes alternative reporting arrangements, in advance, with the Illinois EPA.
 - x. The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made

available for inspection, upon request, by the Illinois EPA for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Illinois EPA for a period of 5 years after each revision to the plan.

b. The Permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, provided the alternative plans meet the requirements of this section.

7a. Within 60 days of a written request from the Illinois EPA, the Permittee shall complete performance test to demonstrate initial compliance pursuant to 40 CFR 63.343(b), during conditions which are representative of maximum emissions, i.e. at maximum rated rectifier capacity of all tanks.

b. The following methods and procedures shall be used for performance testing, unless another method is approved by the Illinois EPA: Refer to 40 CFR 63, Appendix A, for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Chromium	USEPA Method 306 and 306A
Surface Tension	USEPA Method 306B

c. At least thirty (30) days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review and approval. This plan shall describe the specific procedures for testing including as a minimum:

- i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
- ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.
- iii. The specific determination of emissions and operations which are intended to be made, including sampling and monitoring locations.
- iv. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods. The specific sampling, analytical and quality control procedures will be used, with an identification of the standard method upon which they are based.
- v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
- vi. Any proposed use of an alternative test method, with detailed

justification.

- vii. The format and content of the Source Test Report prior to carrying out these tests, the Illinois EPA shall be notified a minimum of thirty (30) days prior to the scheduled date of these tests with the exact date, time, and place of these tests, to enable the Illinois EPA to witness these tests.

If the scheduled date for the test is changed for unforeseen reasons, the Permittee shall inform the Illinois EPA within five (5) working days of the scheduled test date and must specify the date of the rescheduled test.

A copy of the Final Report(s) for these tests and compliance status shall be submitted to the Illinois EPA within fourteen (14) days after the test results are compiled and finalized, prior to or accompanying the operating permit application. Satisfactory completion of these tests and compliance with the limitations of this permit shall be prerequisite to the issuance of an operating permit.

viii. A statement that the testing will be performed by a qualified independent testing service.

8a. The Final Report shall include as a minimum:

Three (3) copies of the Final Report(s) for these tests and compliance status shall be submitted to the Illinois EPA within 90 days after the performance test, whichever occurs first. If testing is not required, report shall be submitted no later than 30 days of compliance date.

- i. A summary of results and compliance status.
- ii. General information.
- iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
- iv. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process weight rate, e.g. raw material consumption, rectifier capacity.
 - B. Sampling and analysis procedures and any modifications to standard procedure.
 - C. Range of surface tension in dynes/cm or maintain the surface tension of 45 dynes/cm.
 - D. A discussion of any preparatory actions taken, i.e., standard preparation, inspections, maintenance and repair.
 - E. A discussion of calibration procedure.

- v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- vi. An explanation of any discrepancies among individual tests or anomalous data.
- vii. Quality assurance procedure and result.

viii. Any additional information required by the test method.

b. Submittals of information shall be made as follows:

- i. Submittal of Test Plan - one copy to Source Emission Test Specialist.
- ii. Notices of Test - one copy to Source Emission Test Specialist, one copy to the Regional Office, and one copy to Permit Section.
- iii. Final Report - one copy to Source Emission Test Specialist, one copy to the Regional Office, and one copy to Permit Section.

9. The Permittee shall keep the following records, pursuant to 40 CFR 63.346, to demonstrate continuous compliance monitoring requirement:

Records of monitoring data required by 40 CFR 63.343(c) shall be kept to demonstrate continuous compliance.

- a. The surface tension is dynes/cm, determined every 4 hours except as provided below.
- b. If there are no exceedances of the maximum surface tension after 40 hours of operation, then the monitoring frequency can be decreased to once every 8 hours. If there are no exceedances for the next 40 hours, then the frequency can be decreased to once every 40 hours. If an exceedance occurs at any time after that, then the initial monitoring schedule (every 4 hours) must be resumed.
- c. Records of all maintenance performed on the chrome electroplating tanks as related to emissions, associated control system and monitoring equipment.
- d. Records of the occurrence, duration, and cause (if known) of each malfunction of process, associated control system, and monitoring equipment.
- e. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
- f. Records, which may take the form of checklists, necessary to demonstrate consistency with the operation and maintenance plan required by 40 CFR 63.342(f)(3).
- g. Copies of test reports documenting results of all performance tests, and all measurements as may be necessary to determine the

conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of 40 CFR 63.344(e).

- h. Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.

- i. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, control or monitoring equipment.
 - j. For sources using fume suppressants to comply with the standards, records of the date and time, that fume suppressants are added to the electroplating bath.
 - k. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the subject chrome plating tanks and associated control devices.
 - l. Record for the total process operating time of the affected chrome plating tank(s) during the reporting period.
 - m. Copies of the notification and reports required by 40 CFR Part 63.9, 63.10 and 63.347 with supporting documentation.
 - n. All records shall be maintained for a period of five years, pursuant to 63.10(b)(1).
10. The Permittee shall comply with the following reporting requirements; pursuant to 40 CFR 63.347:
- a. The Permittee shall submit initial notification to the Illinois EPA on or before July 24, 1995, in writing that the source is subject to 40 CFR Part 63 Subpart N.
 - b. The initial notification shall contain the following:
 - i. The name, title, and address of the owner or operator.
 - ii. The address (i.e., physical location) of each affected source.
 - iii. A statement that the basis for this notification is the National Emission Standard 40 CFR Part 63, Subpart N.
 - iv. Identification of the applicable emission limitation and compliance date for each affected source.
 - v. A brief description of each affected source, including the type of process operation performed.

11. The Permittee shall comply with the compliance reporting requirements of 40 CFR 63.347 including the following:
 - a. A notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the affected source has complied with this Subpart, pursuant to 40 CFR 63.347(e). The notification shall list the following:

- i. The applicable emission limitation and the methods that were used to determine compliance with this limitation.
 - ii. The performance test report documenting the results of the performance test, which contains the elements required by 40 CFR 63.344(a), including measurements and calculations to support the special compliance provisions of 40 CFR 63.344(e) if these are being followed.
 - iii. If the Permittee does not require to conduct a performance test in accordance with 40 CFR 63.343(b), the surface tension measurements in dynes/cm shall be submitted.
 - iv. The specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit.
 - v. The methods that will be used to determine continuous compliance.
 - vi. A description of the air pollution control technique for each emission point.
 - vii. A statement that the owner or operator has completed and has on file the operation and maintenance plan as required by the work practice standards of 40 CFR 63.342(f).
 - viii. If the Permittee is determining facility size based on actual cumulative rectifier capacity in accordance with 40 CFR 63.342(c)(2), records to support that the facility is small.
 - ix. Records from any 12-month period preceding the compliance date shall be used or a description of how operations will change to meet a small designation shall be provided.
 - x. A statement by the owner or operator of the affected source as to whether the source has complied with the provisions of this Subpart.
- b. The notification of compliance status and reports of performance test results shall be submitted to the Illinois EPA no later than 90 calendar days following completion of the compliance demonstration/performance test.
- 12a. The Permittee shall prepare an ongoing compliance status report every year and retained on site, and made available to the Illinois EPA upon request. However, if both of the following conditions are met, semiannual reports shall be prepared and submitted to the Illinois EPA:

- i. The total duration of excess emissions (as indicated by the monitoring data) is 1 percent or greater of the total operating time for the reporting period; and
- ii. The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.

- b. The ongoing compliance report shall contain the following:
 - i. The company name and address of the affected source.
 - ii. An identification of the operating parameter that is monitored for compliance determination.
 - iii. The relevant emission limitation for the source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status.
 - iv. The beginning and ending dates of the reporting period.
 - v. A description of the type of process performed in the source.
 - vi. The total operating time of the source during the reporting period.
 - vii. The actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis, if the Permittee limits the maximum cumulative rectifier capacity less than 60 million amp-hr/yr.
 - viii. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
 - ix. A certification by a responsible official that the work practice standards followed in accordance with the operation and maintenance plan for the source.
 - x. If the operation and maintenance plan was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) documenting that the operation and maintenance plan was not followed.
 - xi. A description of any changes in monitoring processes, or controls since the last reporting period.
 - xii. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
 - xiii. The date of the report.

- c. If more than one monitoring device is used, the Permittee shall report the results for each monitoring device. However, when one monitoring device is used as a backup for the primary monitoring device, the Permittee shall only report the results from the monitoring device used to meet the monitoring requirements. If both devices are used to meet these requirements, then the owner or operator shall report the results from each monitoring device for the relevant compliance period.

- 13a. The halogenated solvent cleaning machine is subject to 40 CFR part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning. The Illinois EPA is administering this regulation in Illinois on behalf of the United States EPA under a delegation agreement. The United States EPA issued this final rule on December 2, 1994.
- b. The Permittee must be in compliance with 40 CFR Part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning on or before December 2, 1997.
- 14a. Solvent usage shall not exceed the following limits:

<u>Solvent Usage</u>		<u>Organic Material Emissions</u>	
<u>(Lb/Month)</u>	<u>(Ton/Year)</u>	<u>(Lb/Month)</u>	<u>(Ton/Year)</u>
1,880	9.4	1,880	9.4

These limits are based on maximum solvent usage trichloroethylene, operating hours and determined by material balance.

- b. 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.
- c. The Permittee shall use only trichloroethylene as solvent.
- 15a. For determination of compliance with the limits of this permit, solvent usage shall be determined by the following equation:

$$U = V - (W \times P)$$

Where:

U = Solvent usage for compliance determinations (gallons).

V = Virgin solvent^A added to the solvent cleaning machines (gallons), as determined by daily addition log sheets.

W = Waste solvent^B removed from the solvent cleaning machines and sent off-site for reclamation or disposal, as determined by monthly manifests.

P = Percent concentration of solvent in waste, as determined by analysis/testing^C.

^A For purposes of this permit, virgin solvent is defined as unused solvent.

^B For purposes of this permit, waste solvent is defined as used solvent.

^C The percent concentration of solvent in waste (P) shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

- b. Compliance with the monthly organic material emission limits shall be calculated using the solvent density as specified in the Material Safety Data Sheet, and the solvent usage (U) per month, as follows:

$$\begin{aligned} \text{Emissions} &= \text{Solvent Usage (U)} \times \text{Solvent Density} \\ (\text{lbs/month}) &= (\text{gallon/month}) \quad \times \quad (\text{lbs/gallon}) \end{aligned}$$

- 16. Each solvent cleaning machine must meet the following base design requirements, pursuant to 40 CFR, Part 63.463.
 - a. Each solvent cleaning machine must be equipped with an idling or downtime mode cover that completely covers the machine openings. The cover must be periodically inspected to ensure that it remains free of cracks, holes, and other defects. The cover must be closed at all times except during the cleaning, solvent removal, maintenance and monitoring of the degreasers.
 - b. A freeboard ratio of 0.75 or greater must be maintained for each solvent cleaning machine.
 - c. Each solvent cleaning machine must have an automated parts handling system that handles parts from initial loading to removal of cleaned parts. If the Permittee wants to use manual hoist, the Permittee must demonstrate to the Illinois EPA that the hoist can never exceed 11 feet per minute.
 - d. Each solvent cleaning machine must be equipped with a liquid and vapor level control device(s) that shuts off the sump heat if the sump liquid level drops to the sump heater coils or the vapor level rises above the height of the primary condenser and such device(s) must be operational at all times.
 - e. Each solvent cleaning machine must be equipped with a primary condenser to provide continuous condensation or rising solvent vapors and to create a controlled vapor zone.
 - f. Each solvent cleaning machine with lip exhaust control must be controlled by a carbon adsorption unit.
- 17. The Permittee shall comply with the following work and operational practice, requirements and post in the work place a one page summary of work practices, pursuant to 40 CFR Part 63.463(d).
 - a. Conduct maintenance as per manufacturer's recommendation to ensure that each solvent cleaning machine works properly. Any alternative maintenance practice must be approved by the USEPA.

- b. Each solvent cleaning machine shall be covered to minimize air disturbances in the machine and the room at all times except during the cleaning, removal of solvent, maintenance and monitoring. If a cover cannot be used, air disturbances shall be controlled by Reduced Room Draft. Room draft shall not exceed 50 feet/minute.

- c. i. A speed of 3 feet/minute or less shall be maintained between entry and removal of parts basket or parts.

or

- ii. Parts basket or parts size shall be less or equal to 50% of the solvent air interface area.
 - d. If cleaning operation involves spraying, spraying must be performed within the vapor zone (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - e. The Permittee must ensure that parts or parts basket are positioned so that solvent drains freely and parts basket or parts are not removed from the machine until parts are clean and solvent dripping has stopped.
 - f. During the startup, the Permittee must turn on the primary condenser prior to turning on the sump pump and during shutdown, turn off the sump heater prior to turning off the primary condenser.
 - g. The Permittee must add and remove solvent with leak-proof couplings. The end of the pipe or hose introducing or withdrawing the solvent be located beneath the liquid solvent surface (i.e., submerged filling) in the sump.
 - h. The Permittee must collect and store the waste solvent, still bottoms, and sump bottoms in a closed container. Absorbent materials such as sponges, fabric, wood, and paper products shall not be cleaned.
 - i. Each operator of a solvent cleaning operation must be ready to take and pass an Operator Test at any time during the normal operation of the plant.
18. Each machine must meet the following control combination (working mode cover, dwell, and freeboard ratio of 1.0) requirements, pursuant to 40 CFR Part 63.463:
- a.
 - i. For working mode cover, cover must be closed over entire cleaning machine opening at all times except during parts entry and removal.
 - ii. A monthly inspection shall be conducted to ensure that it opens and closes properly and is free of cracks, holes, and other possible defects. If any cracks, holes or other possible defects are detected, the Permittee shall correct the defect within 15 days from the date of detection.

- iii. Results of inspection shall be recorded.
- b. i. The Permittee shall ensure and obtain certification from the manufacturer that the freeboard height is greater than or equal to the width of the interior freeboard. Freeboard ratio shall be determined by dividing the height of freeboard to the smallest interior freeboard width. If the freeboard ratio is less than 1.0 , the Permittee shall immediately correct the freeboard ratio.

- ii. Record of Freeboard Ratio and any modification to the Freeboard Ratio.
 - c.
 - i. The Permittee shall determine the dwell time for parts to be cleaned. The dwell time is determined as follows:
 - A. Using a stopwatch, measure the amount of time takes for the parts or parts baskets to cease dripping once placed in the vapor zone. This is the primary cleaning time.
 - B. The dwell time shall be greater than or equal to 35% of the primary cleaning time.
 - ii. The Permittee shall ensure that parts are held in the freeboard area above the vapor zone for the determined dwell time. A monthly measurement of the actual dwell time shall be conducted.
 - iii. Record dwell time determination in second and time measurement calculations for life time.
- 19. The Permittee shall comply with the following monitoring procedures requirements, pursuant to 40 CFR Part 63.466.
 - a. The Permittee shall conduct monitoring and record the results on a monthly basis for the cover (working-mode, downtown-mode, and/or idling mode cover), pursuant to 40 CFR 63.466(b)(1). A visual inspection to be conducted to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
 - b. The Permittee shall conduct monitoring and record the results on a monthly basis for the dwell, pursuant to 40 CFR Part 63.466(b)(2). The Permittee shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.
- 20a. The Permittee shall retain the following records on paper or computer disk for the lifetime of the solvent cleaning machine, pursuant to 40 CFR Part 63.467(a):
 - i. An owners manual or a written maintenance and operating procedure for each machine and each piece of control equipment.
 - ii. The installation date of each machine. If installation date isn't

available, a letter certifying that machine was installed prior to or on or after November 29, 1993, to determine compliance option for existing or new source.

- iii. Records of the halogenated HAP solvent content of each solvent used in each solvent cleaning machine.
- iv. Record of the test to determine an appropriate dwell time for each part or parts basket.

- b. The Permittee shall retain the following records in electronic or written form for a period of 5 years, pursuant to 40 CFR Part 63.467(b).
 - i. The results of control device monitoring required under 40 CFR Part 63.466.
 - A. Results of monthly inspection.
 - B. Record of freeboard ratio and any modification to the freeboard ratio.
 - C. Record of dwell time determination in second and monthly actual dwell time determination calculation.
 - ii. Estimates of annual solvent consumption for each solvent cleaning machine.
21. The Permittee shall comply with the following reporting requirements, pursuant to 40 CFR Part 63.468:
- a. An initial statement of compliance report demonstrating each machine is in compliance must be submitted no later than 150 days after startup. The initial compliance report shall include the following:
 - i. Name and address.
 - ii. Facility location address.
 - iii. A list of control equipment (i.e., FRD, RRD) used on each machine to comply with the rule.
 - iv. For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
 - b. An annual compliance report must be submitted by February 1, of the year following the year the report covers. The compliance report shall include the following:
 - i. A statement, signed by the owner or operator or someone designate, stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required by 40 CFR 63.463(d)(10)."
 - ii. Solvent consumption and HAP emissions for each machine in lb/month and ton/year, for the reporting period.

- c. An exceedance report shall be submitted every 6 months if there is not an exceedance, and every 3 months if there is an exceedance. If an exceedance did not occur the report would consist of a statement certifying that there were no exceedances. The frequency of the exceedance report will increase to quarterly after an exceedance occurs. The quarterly exceedance report shall include the following:

- i. Information on the actions taken to comply with 40 CFR Part 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - iii. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- d. The Permittee shall submit an exceedance report 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.
- e. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least 5 years, unless specifically stated in the permit, 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 a 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.

The batch vapor degreaser shall be operated according to the operating and equipment requirements of 35 Ill. Adm. Code 218.183.

- 22. Emissions of particulate matter from all other process tanks listed under this permit shall not exceed the nominal emission rate of 0.05 lb/hour and 0.22 ton/year from each individual emission unit.
- 23. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
- 24. 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 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.

25. 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.
26. 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
9511 West Harrison
Des Plaines, Illinois 60016

27. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: trichloroethylene and hydrochloric acid usage (lbs/mo, tons/yr).

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

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

DES:RBS:jar

cc: Region 1
Illinois EPA, Compliance Section
USEPA

Attachment A

This attachment provides a summary of the maximum emission from the metal finishing 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 well below the levels, e.g., 10 tons per year of any single hazardous air pollutant, less than 25 tons/year of a combination of all hazardous air pollutants, and 25 tons/year of volatile organic material 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, and control measures are more effective than required in this permit.

1. Emission and operation of the batch vapor degreaser shall not exceed the following limits:

Solvent Usage		VOM (HAP) Emissions	
<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>	<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>
1,880	9.4	1,880	9.4

These limits are based on maximum solvent usage, trichloroethylene being the solvent used, solvent density of 12.2 lb/gal and emissions determined by material balance. 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.

2. Emissions of particulate matter from all process tanks listed under this permit shall not exceed the nominal emission rate of 0.05 lb/hour and 0.22 ton/year from each individual emission unit.
3. Usage and emissions of HCl shall not exceed

Usage		HCl Emissions	
<u>(TPM)</u>	<u>(TPY)</u>	<u>(TPM)</u>	<u>(TPY)</u>
1.0	9.5	0.05	0.5

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