

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Whiting Corporation
Attn: Frederick P. Teggelaar
26000 Whiting Way
Monee, Illinois 60449

Application No.: 00080045
Applicant's Designation: COATNGPROC
Subject: Coating Process
Date Issued: March 21, 2003
Location: 26000 Whiting Way, Monee

I.D. No.: 197065AAK
Date Received: December 26, 2002
Expiration Date: June 26, 2007

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of four coating booths with booth filters, 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., 25 tons/year of VOM, 10 tons/year for a single HAP and 25 tons/year for totaled HAP). 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 35 Ill. Adm. Code 218.204(j)(2)(A) "Air dried extreme performance coating to miscellaneous metal parts and products", the VOM content of the coatings applied to miscellaneous metal parts shall not exceed 3.5 lbs of VOM per gallon of coating, minus water and any compounds specifically exempted from the definition of VOM. This permit authorizes operation of the coating booths based on an ongoing demonstration of compliance with 35 Ill. Adm. Code 218.204(j)(2)(A).
- 3a. Total combined emissions and material usage (including VOM and HAP emissions associated with clean-up operations) from the all coating booths (coating lines and their associated flash-off areas, drying areas, prep. Solvents, booth solvents, etc.) shall not exceed the following limits:

i.	VOM and Combined HAP Usage		VOM and Combined HAP ¹ Emissions	
	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
	4,600	23.0	4,600	23.0

ii.	Single HAP ¹ Usage		Single HAP ² Emissions	
	(Lb/Month)	(Tons/Year)	(Lb/Month)	(Tons/Year)
	1,980	9.90	1,980	9.90

¹ Combined HAP means the sum of all individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., toluene, MEK, hexane, vinyl acetate, formaldehyde, etc.).

² Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., toluene, MEK, hexane, vinyl acetate, formaldehyde, etc.).

These emissions are based on maximum monthly usage rates and 100% of the VOM and HAPs used being emitted.

- b. 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.
- 4a. Compliance with the annual limits for the coating lines shall be determined daily using a rolling total of 12 months of data.
- b. Compliance with the rolling annual limits, for each month of the 12 months period immediately following the issuance date of this permit, shall be determined using available data from the previous year.
- c. Monthly emission calculations shall be made of the total emissions of VOM, total combined HAPs, and of single HAPs using the data specified in the record keeping requirements of this permit, e.g., usage, density, and weight percent VOM and HAP content.
- d. The monthly calculation of the emissions of VOM and HAPs shall be made using the VOM and HAP content as determined through the testing of the coating or solvent consistent with that specified in this permit, or if such testing has not been performed, data based on information supplied by the coating or solvent manufacturer or supplier may be used.
- 5a. Within 30 days of a written request from the Illinois EPA, the Permittee shall submit data on representative coatings and solvents as applied, determined by laboratory analysis in accordance with the procedures of 35 Ill. Adm. Code Section 218.105.
- b. The submitted data shall include the weight percent VOM and/or HAP content of the coatings and solvents, a justification of why these are representative, and a description of the sampling procedures and documentation for the analysis.

- c. The Illinois EPA may provide additional time for the performance of this testing upon request from the Permittee which shows that it is not feasible to perform representative testing within 30 days.
- 6. This permit is issued based on negligible emissions of particulate matter from the four powder spray coating lines. For this purpose emissions from each such emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
- 7a. Pursuant to 35 Ill. Adm. Code 218.211(c), the Permittee shall collect and record all of the following information each day for each coating line:
 - i. The Name and identification number of each coating as applied on each coating line.
 - ii. 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 day on each coating line.
- b. The Permittee shall also maintain the following records to verify compliance with the limitations of this permit:
 - i. Volume of each coating used (gallons/month and gallons/year);
 - ii. Name and identification of all cleanup solvents used and any other solvents used, and their usage rate (lbs/month and tons/year);
 - v. VOM content of each cleanup solvent and parts washer solvent used (weight percent).
 - vii. Hazardous Air Pollutant content of all coatings, cleanup solvents and any other solvents.
 - viii. Monthly and annual VOM, individual HAP and combined HAP emissions (from all coatings, cleanup solvents and any other solvents). Annual emissions shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- c. 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 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.
- 8. 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.

9. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year; if there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.
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 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

Please note that this permit is revised to reduce VOM/Combined HAP usage and emissions in Condition 3(a).

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

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

DES:JPB:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes - USEPA

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario that results in maximum emissions from such a coating plant. The resulting maximum emissions are well below the levels, i.e., 25 tons/year VOM, 10 tons/year individual HAPs, and 25 tons/year combined HAP 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.

1. Emission Units:

All Coating Lines

a.	<u>VOM and Combined HAP Usage</u>		<u>VOM and Combined HAP¹ Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
	4,600	23.0	4,600	23.0
b.	<u>Single HAP¹ Usage</u>		<u>Single HAP² Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
	1,980	9.90	1,980	9.90

¹ Combined HAP means the sum of all individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., toluene, MEK, hexane, vinyl acetate, formaldehyde, etc.).

² Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., toluene, MEK, hexane, vinyl acetate, formaldehyde, etc.).

These emissions are based on maximum monthly usage rates and 100% of the VOM and HAPs used being emitted.

The emissions of this attachment define the potential emissions of the source.