

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Metro East Industries, Inc.
Attn: Gayle L. Ortyl
4600 Kimberly Lake Lane
Belleville, Illinois 62226

<u>Application No.:</u> 03090011	<u>I.D. No.:</u> 163005AAE
<u>Applicant's Designation:</u>	<u>Date Received:</u> October 21, 2010
<u>Subject:</u> Rail Car Grit Blasting and Painting	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 3200 Missouri Avenue, Alorton, St Clair County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting a rail car spray painting operation and a solvent recovery still 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:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., less than 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutants (HAP), and 25 tons/year for any combination of such 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.
 - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products, 40 CFR Part 63 Subpart Mmmm.
 - vi. To establish federally enforceable production and operating limitations, which restrict the maximum theoretical emissions of VOM to less than 100 tons per year so that the solvent recovery still at this source is not subject to the requirements 35 Ill. Adm. Code Part 219 Subpart TT (Other Emission Units).
- 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) for this location.

- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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 which, 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 Ill. Adm. Code 212.321(c).
- 3a. Pursuant to 35 Ill. Adm. Code 219.187(a), on and after January 1, 2012: except as provided in 35 Ill. Adm. Code 219.187(a)(2), the requirements of 35 Ill. Adm. Code 219.187 (Other Industrial Solvent Cleaning Operations) shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 219.187(a)(2). For purposes of 35 Ill. Adm. Code 219.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- b. Pursuant to 35 Ill. Adm. Code 219.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 219.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to this Section unless the owner or operator meets

the requirements in 35 Ill. Adm. Code 219.187(b)(1), (b)(2), or (b)(3). No owner or operator of a source that manufactures coatings, inks, adhesives, or resins shall perform any cleaning operation subject to this Section unless the owner or operator meets the requirements in at least one of the following: 35 Ill. Adm. Code 219.187(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5).

- i. The VOM content of the as-used cleaning solutions does not exceed the following emissions limitations:

	kg/l	lb/gal
All other cleaning operations not subject to a specific limitation in 35 Ill. Adm. Code 219.187(b)(1)(A) through (b)(1)(D)	0.050	0.42

- ii. The VOM composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);

- c. Pursuant to 35 Ill. Adm. Code 219.204(k), except as provided in 35 Ill. Adm. Code 219.205, 219.207, 219.208, 219.212, 219.215 and 219.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for heavy off-highway vehicle products coating. Except as otherwise provided in 35 Ill. Adm. Code 219.204(a), (c), (g), (h), (j), (l), (n), (o), and (q), compliance with the emission limitations marked with an is required on and after March 15, 1996. The following emission 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 each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code Part 219 Subpart F (Coating Operations) must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 219.206 shall be used to calculate emission limitations for determining compliance by add-on controls, credits for transfer efficiency, emissions trades and cross-line averaging.) The emission limitations are as follows:

	kg/l	lb/gal
Heavy Off-Highway Vehicle Products Coating		
i. Extreme performance prime coat	0.42	(3.5)
ii. Extreme performance topcoat (air dried)	0.42	(3.5)
iii. Final repair coat (air dried)	0.42	(3.5)
iv. All other coatings are subject to the emission limitations for miscellaneous metal parts and products coatings in 35 Ill. Adm. Code 219.204(j).		

- d. Pursuant to 35 Ill. Adm. Code 219.204(q)(1), On and after May 1, 2012, the owner or operator of a miscellaneous metal or plastic parts coating line shall comply with the limitations 35 Ill. Adm. Code 219.204(q). The limitations in 35 Ill. Adm. Code 219.204(q) shall not apply to aerosol coating products, powder coatings, or primer sealants and ejection cartridge sealants used in ammunition manufacturing. Primer sealants and ejection cartridge sealants shall instead be regulated under 35 Ill. Adm. Code Part 219 Subpart TT.

Metal Parts and Products. For purposes of 35 Ill. Adm. Code 219.204(q)(1), "corrosion resistant basecoat" means a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance. The limitations in 35 Ill. Adm. Code 219.204(q)(1) shall not apply to stencil coats, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating. The limitations in 35 Ill. Adm. Code 219.219, however, shall apply to these coatings unless specifically excluded in 35 Ill. Adm. Code 219.219.

	kg VOM/l coating solids applied	lb VOM/gal coating solids applied
i. General one component coating Air dried	0.34 (2.8)	0.54 (4.52)
ii. General multi-component coating Air dried	0.34 (2.8)	0.54 (4.52)
iii. Extreme performance coating Air dried	0.42 (3.5)	0.80 (6.67)
iv. Pretreatment coating	0.42 (3.5)	0.80 (6.67)
v. Repair coats and touch-up coatings Air dried	0.42 (3.5)	
vi. All other coatings Air dried	0.40 (3.3)	0.73 (5.98)

- e. Pursuant to 35 Ill. Adm. Code 219.205, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 and complying by means of 35 Ill. Adm. Code 219.205 shall operate the

subject coatings line unless the owner or operator has demonstrated compliance with 35 Ill. Adm. Code 219.205(a), (b), (c), (d), (e), (f), (g), (h), (i), or (j) (depending upon the category of coating) through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.211(d):

- i. No owner or operator of a heavy off-highway vehicle products coating line subject to the limitations of 35 Ill. Adm. Code 219.204(k) shall apply coatings to heavy off-highway vehicle products on the subject coating line unless the requirements of to 35 Ill. Adm. Code 219.205(d)(1) or (d)(2) of this Section are met.
 - A. For each coating line which applies multiple coatings, all of which are subject to the same numerical emission limitation within 35 Ill. Adm. Code 219.204(k), during the same day (e.g., all coatings used on the line are subject to 0.42 kg/l (3.5 lbs/gal), the daily-weighted average VOM content shall not exceed the coating VOM content limit corresponding to the category of coating used; or
 - B. For each coating line which applies coatings subject to more than one numerical emission limitation in 35 Ill. Adm. Code 219.204(k), during the same day, the owner or operator shall have a site specific proposal approved by the Illinois EPA and approved by the USEPA as a SIP revision. To receive approval the requirements of USEPA's Emissions Trading Policy Statement (and related policy) 51 Fed. Reg. 43814 (December 4, 1986) must be satisfied.
- ii. On and after May 1, 2012, no owner or operator of a miscellaneous metal parts and products coating line, plastic parts or products coating line, pleasure craft surface coating line, or motor vehicle materials coating line subject to the limitations of 35 Ill. Adm. Code 219.204(q) shall apply coatings on the subject coating line unless the requirements of 35 Ill. Adm. Code 219.205(j)(1) or (j)(2) are met:
 - i. For each coating line that applies multiple coatings, all of which are subject to the same numerical emission limitation within 35 Ill. Adm. Code 219.204(q), during the same day (e.g., all coatings used on the line are subject to 0.42 kg/l (3.5 lbs/gal)), the daily weighted average VOM content shall not exceed the coating VOM content limit corresponding to the category of coating used; or
 - ii. For each coating line that applies coatings subject to more than one numerical emission limitation in 35 Ill. Adm. Code 219.204(q), during the same day, the owner or operator shall have a site specific proposal approved by the Illinois EPA and approved by USEPA as a SIP revision. To

receive approval, the requirements of USEPA's Emissions Trading Policy Statement (and related policy) must be satisfied.

- f. Pursuant to 35 Ill. Adm. Code 219.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 219.302, 219.303, 219.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 219 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.
- 4a. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart and MMMM. This is a result of the federally enforceable production and operating limitations, which have been established in this permit to restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH, because the source is not involved in the spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- 5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 6a. Pursuant to 35 Ill. Adm. Code 219.187(a)(2)(B)(x), notwithstanding 35 Ill. Adm. Code 219.187(a)(1): Cleaning operations for emission units within the miscellaneous metal parts coating category shall be exempt from the requirements of 35 Ill. Adm. Code 219.187(b), (c), (d), (e), (f), and (g).
- b. Pursuant to 35 Ill. Adm. Code 219.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 is required to meet the limitations of 35 Ill. Adm. Code Part 219 Subpart

G (35 Ill. Adm. Code 219.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 219.204.

- c. Pursuant to 35 Ill. Adm. Code 219.219(c)(2), notwithstanding 35 Ill. Adm. Code 219.219(b), the application method limitations in 35 Ill. Adm. Code 219.219(b)(6) shall not apply to the following: For metal parts and products coating operations: touch-up coatings, repair coatings, textured finishes, stencil coatings, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating
- 7a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code Part 212 Subpart K (Fugitive Particulate Matter), including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;

- vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code Part 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 8a. Pursuant to 35 Ill. Adm. Code 219.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 219.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.187(e).
- b. Pursuant to 35 Ill. Adm. Code 219.187(d), the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 219.187 shall comply with the following for each subject cleaning operation. Such requirements are in addition to work practices set forth in 35 Ill. Adm. Code 219.187(b)(4) and (b)(5), as applicable:
- i. Cover open containers and properly cover and store applicators used to apply cleaning solvents;
 - ii. Minimize air circulation around the cleaning operation;
 - iii. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
 - iv. Utilize equipment practices that minimize emissions;
 - v. When using cleaning solvent for wipe cleaning, sources that manufacture coatings, inks, adhesives, or resins shall:
 - A. Cover open containers used for the storage of spent or fresh organic compounds used for cleanup or coating, ink, adhesive, or resin removal; and
 - B. Cover open containers used for the storage or disposal of cloth or paper impregnated with organic compounds that are used for cleanup or coating, ink, adhesive, or resin removal.
- b. Pursuant to 35 Ill. Adm. Code 219.206, Limitations in terms of kg (lbs) of VOM emissions per 1 (gal) of solids as applied at each coating applicator shall be determined by the following equation:

$$S = \frac{C}{\quad}$$

1 - (C/D)

where:

- S = The limitation on VOM emissions in terms of kg VOM/l (lbs VOM/gal) of solids;
- C = The limitation on VOM emissions in terms of kg/l (lbs/gal) of coating (minus water and any compounds which are specifically excluded from the definition of VOM) specified in 35 Ill. Adm. Code 219.204;
- D = The density of VOM in the coating. For the purposes of calculating S, the density is 0.882 kg VOM/l VOM (7.36 lbs VOM/gal VOM).
- c. Pursuant to 35 Ill. Adm. Code 219.210(i), no owner or operator of a coating line subject to the emission limitations in 35 Ill. Adm. Code 219.204(a)(2) or (q), or subject to the limitations in 35 Ill. Adm. Code 219.219, shall operate the coating line on or after a date consistent with 35 Ill. Adm. Code 219.106(e), unless the owner or operator has complied with, and continues to comply with, 35 Ill. Adm. Code 219.204(a)(2) or (q), if applicable, or the alternative control options in 35 Ill. Adm. Code 219.205 or 219.207, and all applicable requirements in 35 Ill. Adm. Code 219.211 and 219.219.
- d. Pursuant to 35 Ill. Adm. Code 219.218(b), on and after May 1, 2011, every owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 219.204(g) or 219.204(h) shall:
- i. Store all VOM-containing coatings, thinners, coating-related waste materials, cleaning materials, and used shop towels in closed containers;
 - ii. Ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing those materials;
 - iii. Minimize spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials, and clean up spills immediately;
 - iv. Convey VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes;
 - v. Minimize VOM emissions from the cleaning of storage, mixing, and conveying equipment; and
 - vi. Apply all coatings using one or more of the following application methods:

- A. Electrostatic spray;
 - B. High volume low pressure (HVLP) spray;
 - C. Flow coating. For the purposes of this 35 Ill. Adm. Code 219.218(b), flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
 - D. Roll coating;
 - E. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 219.218(b), electrodeposition means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
 - F. Brush coating, if subject to the requirements of 35 Ill. Adm. Code 219.204(h); or
 - G. Another coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if such method is approved in writing by the Illinois EPA.
- e. Pursuant to 35 Ill. Adm. Code 219.219(b), except as provided in 35 Ill. Adm. Code 219.219(c), every owner or operator of a coating line described in 35 Ill. Adm. Code 219.204(q) shall:
- i. Store all VOM-containing coatings, thinners, coating-related waste materials, cleaning materials, and used shop towels in closed containers;
 - ii. Ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials;
 - iii. Minimize spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials;
 - iv. Convey VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes;
 - v. Minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers; and

- vi. Apply all coatings using one or more of the following application methods:
 - A. Electrostatic spray;
 - B. High volume low pressure (HVLP) spray;
 - C. Flow coating. For the purposes of 35 Ill. Adm. Code 219.219(b)(6)(C), flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
 - D. Roll coating;
 - E. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 219.219(b)(6)(E), electrodeposition means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
 - F. Airless spray;
 - G. Air-assisted airless spray; or
 - H. Another coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.

- 9a. 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.

- b. This permit is issued based on the coatings used at this source not containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

- 10a. The VOM emissions from and operation of the coating line shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
11.13	89.00	11.13	89.00

These limits are based on the maximum production rate. The VOM and HAP emissions shall be calculated using the following equation:

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

Where:

E = VOM or HAP emissions (tons);

P_i = Coating and solvent usage (gal);

D_i = Density of Coatings and Solvents (lb/gal); and

C_i - VOM of HAP content of coating and solvent used (% by weight)

- b. This permit is issued based on negligible emission of particulate matter from the coating line. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
 - c. This permit is issued based on negligible emissions of volatile organic material (VOM) from the solvent recovery still. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
 - d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. 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 and the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart and Mmmm.
- 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Condition 12 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 12a. Pursuant to 35 Ill. Adm. Code 219.187(g)(1), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 219.187 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 219.187. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during the testing;
- b. Pursuant to 35 Ill. Adm. Code 219.187(g)(2), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 219.187(b)(1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:
 - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) shall be used; provided, however, Method 24, shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for cleaning solvents may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 219.105(a); provided, however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern;
 - c. Pursuant to 35 Ill. Adm. Code 219.187(g)(3), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 219.110;
 - d. Pursuant to 35 Ill. Adm. Code 219.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105 to establish the records required under 35 Ill. Adm. Code 219.211.

13. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 14a. Pursuant to 35 Ill. Adm. Code 219.187(e)(3), all sources complying with 35 Ill. Adm. Code 219.187 pursuant to the requirements of 35 Ill. Adm. Code 219.187(b)(1) shall collect and record the following information for each cleaning solution used:
 - i. For each cleaning solution that is prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. The VOM content of each cleaning solvent in the cleaning solution;
 - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
 - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;

- E. The VOM content of the as-used cleaning solution, with supporting calculations; and
 - F. A calibration log for the automatic equipment, detailing periodic checks;
 - ii. For each batch of cleaning solution that is not prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;
 - B. Date, time of preparation, and each subsequent modification of the batch;
 - C. The VOM content of each cleaning solvent in the cleaning solution;
 - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
 - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 219.105(a);
 - b. Pursuant to 35 Ill. Adm. Code 219.187(e)(4), all sources complying with 35 Ill. Adm. Code 219.187 pursuant to the requirements of 35 Ill. Adm. Code 219.187(b)(2) shall collect and record the following information for each cleaning solution used:
 - i. The name and identification of each cleaning solution;
 - ii. Date, time of preparation, and each subsequent modification of the batch;
 - iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 219.110;
 - iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - v. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 219.110;

- c. Pursuant to 35 Ill. Adm. Code 219.187(e)(10), all records required by 35 Ill. Adm. Code 219.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.

- d. Pursuant to 35 Ill. Adm. Code 219.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 219.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
 - 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;
 - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 219.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line, and certified product data sheets for each coating.

- e. Pursuant to 35 Ill. Adm. Code 219.211(d)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 and complying by means of 35 Ill. Adm. Code 219.205 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating as applied on each coating line;
 - ii. The weight of VOM per volume and the 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; and
 - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 219.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line.

- iv. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 219.104.
 - f. Pursuant to 35 Ill. Adm. Code 219.211(h)(3), on and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 219.219 shall maintain at the source all records required by 35 Ill. Adm. Code 219.211(h) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- 15a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Clean-up solvent usage (gallons/month and gallons/year);
 - ii. Density of each clean-up solvent applied (lbs/gallon);
 - iii. VOM and HAP content of each clean-up solvent applied (% by weight);
 - iv. Coating usage of each coating applied (gallons/month and gallons/year);
 - v. Density of each coating applied (lbs/gallon);
 - vi. VOM and HAP content of each coating applied ((% by weight); and
 - vii. Monthly and annual PM, VOM, and HAP emissions from the source with supporting calculations (tons/month, tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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 storage device) 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.
- 16a. Pursuant to 35 Ill. Adm. Code 219.187(e)(9), all sources subject to the requirements of 35 Ill. Adm. Code 219.187(b) and (d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 219.187(b) or (d) by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation;
- b. Pursuant to 35 Ill. Adm. Code 219.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 of other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code

219.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:

- i. Any record showing violation of 35 Ill. Adm. Code 219.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(d) or (e), as applicable.
- c. Pursuant to 35 Ill. Adm. Code 219.211(d)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 and complying by means of 35 Ill. Adm. Code 219.205 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 219.205 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing method of compliance with 35 Ill. Adm. Code Part 219 Subpart F from 35 Ill. Adm. Code 219.205 to 35 Ill. Adm. Code 219.204 or 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(c)(1) or (e)(1), as applicable. Upon changing the method of compliance with 35 Ill. Adm. Code 219 Subpart F from 35 Ill. Adm. Code 219.205 to 35 Ill. Adm. Code 219.204 or 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(c) or (e), as applicable.
- d. Pursuant to 35 Ill. Adm. Code 219.211(h)(3), on and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 219.219 shall comply with the following: Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 219.219 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
- e. Pursuant to 35 Ill. Adm. Code 219.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 219 Subpart PP, QQ, RR, TT or 35 Ill.

Adm. Code 219.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.

17a. If there is an exceedance of or a deviation from 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 or deviation. 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.

b. Two (2) copies of required reports and notifications 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
2009 Mall Street
Collinsville, Illinois 62234

It should be noted that the grit blasting operation is exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa).

If you have any questions on this permit, please contact Mike Dragovich at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:MJD:jws

cc: Illinois EPA, Region 3
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the railroad car coating systems 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., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such 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 less material is handled, less paints and solvents are used, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)			
	<u>PM</u>	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAPs</u>
Coating Operation	0.44	89.00		
Solvent Recovery Still		<u>0.44</u>		
Totals:	<u>0.44</u>	<u>89.44</u>	<u>9.00</u>	<u>22.50</u>