

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Quincy Compressor LLC
Attn: Mark H. Cohen
Post Office Box 2028
Pine Brook, New Jersey 07058

<u>Application No.:</u> 97010078	<u>I.D. No.:</u> 001806AAU
<u>Applicant's Designation:</u> QCYCOMP-1	<u>Date Received:</u> October 15, 2009
<u>Subject:</u> Paint Booths	
<u>Date Issued:</u> April 18, 2014	<u>Expiration Date:</u> April 18, 2024
<u>Location:</u> 3501 Wismann Lane, Quincy, Adams County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two (2) paint booths and 3 dry filters, one (1) Ortman spray booth with dry filters, one (1) 231,000 Btu/hour natural gas-fired burn-off oven and one (1) powder coating line pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) 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 212.321(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 process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 3. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 215.204(j), no owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to 35 Ill. Adm. Code Part 215, delivered to the coating applicator:

	<u>kg/l</u>	<u>lb/gal</u>
Miscellaneous Metal Parts and Products Coating		
i. Clear coating	0.52	(4.3)
ii. Air dried coating	0.42	(3.5)
iii. Extreme performance coating	0.42	(3.5)
iv. All other coatings	0.36	(3.0)

- b. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists this limitation of 35 Ill. Adm. Code 215 Subpart K (Use of Organic Material) shall apply only to photochemically reactive material.
- 5a. This permit is issued based on the source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM. This is a result of the 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.

- b. This permit is issued based on the burn off oven not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD because the burn off oven is not located at, nor is part of, a major source of HAP as defined in 40 CFR 63.2.
 - c. This permit is issued based on the coating operations at this source not being subject to the National Emission Standard 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.
 - d. This permit is issued based on the coating operations at this source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63 Subpart XXXXXX, because the source does not use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens.
- 6a. Pursuant to 35 Ill. Adm. Code 215.181(a), the requirements of 35 Ill. Adm. Code 215.182 through 215.184 (Solvent Cleaning) shall not apply to sources whose emissions of volatile organic material do not exceed 6.8 kg (15 lbs) in any one day, or 1.4 kg (3 lbs) in any one hour.
- b. Pursuant to 35 Ill. Adm. Code 215.206(a), the limitations of 35 Ill. Adm. Code 215 Subpart F (Coating Operations) shall not apply to:
 - i. Coating plants in which emissions of volatile organic material as limited by the operating permit will not exceed 22.7 Mg/year (25 tons/year), in the absence of air pollution control equipment; or
 - ii. Coating plants in which the total coating usage does not exceed 9,463 liters/year (2,500 gallons/year).
 - c. Pursuant to 35 Ill. Adm. Code 215.206(b), the limitations of 35 Ill. Adm. Code 215 Subpart F shall not apply to touch-up and repair coatings used by a coating source described in 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j); provided that the source-wide volume of such coatings does not exceed 0.95 liter (1 quart) per eight-hour period or exceed 209 liters/year (55 gallons/year) for any rolling twelve-month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with 35 Ill. Adm. Code 215.206(c).

- d. Pursuant to 35 Ill. Adm. Code 215.206(d), "touch-up and repair coatings" means, for purposes of 35 Ill. Adm. Code 215.206, any coating used to cover minor scratches and nicks that occur during manufacturing and assembly processes.
- e. Pursuant to 35 Ill. Adm. Code 215.209, no coating line subject to the limitations of 35 Ill. Adm. Code 215.204 is required to meet 35 Ill. Adm. Code 215.301 or 215.302 after the date by which the coating line is required to meet 35 Ill. Adm. Code 215.204.
- 7a. In the event that the operation of this emission unit 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. The burn off oven shall only be operated with natural gas as the fuel. The use of any other fuel in the burn off oven requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- c. Material insulated with polyvinyl chloride or asbestos, or scrap containing the fuming metals tin, zinc, or lead shall not be charged to the burn-off oven.
- d. The combustion chamber for the afterburner associated with the burn-off oven shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1,400°F in the absence of a compliance test. This temperature shall be maintained during operation of the burn off oven.
- e. The burn-off oven shall be equipped with an afterburner combustion chamber temperature indicator.
- f. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the paint booth filters and the afterburner associated with the burn-off oven so that the paint booth filters and the afterburner are kept in proper working condition and not causes a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- 8a. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Usage Rate</u>		<u>Maximum VOM</u>		
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Content (lbs/Gal)</u>	<u>VOM Emissions (lbs/Mo)</u>	<u>(Tons/Yr)</u>
2 Waterbase Paint Booths	875	10,500	1.60	1,400	8.40
Ortman Spray Booth	235	2,838	5.80	1,366	8.20

These limits are based on maximum coating usages and the maximum VOM contents of the coatings.

- b. Emissions and operation of cleanup operations shall not exceed the following limits:

<u>Material</u>	<u>Usage Rate</u>		<u>VOM Emissions</u>	
	<u>(lbs/Month)</u>	<u>(Tons/Year)</u>	<u>(lbs/Month)</u>	<u>(Tons/Year)</u>
Cleanup Solvents	1,225	4.90	1,225	4.90

These limits are based on maximum solvent usage.

- c. This permit is issued based on negligible emissions of particulate matter from the three paint booths. For this purpose emissions from each emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- d. This permit is issued based on negligible emissions of particulate matter and volatile organic material from the one powder coating line. For this purpose emissions of each pollutant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- e. This permit is issued based on negligible emissions of Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Particulate Matter (PM), Sulfur Dioxide (SO₂), and Volatile Organic Material (VOM) from the burn off oven. For this purpose, emissions of each pollutant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- f. 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 Mmmm.
- g. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 9a. 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 10 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 10a. Pursuant to 35 Ill. Adm. Code 215.208(a), the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.
- b. Pursuant to 35 Ill. Adm. Code 215.208(b), transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA.

11. 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.

- 12a. Pursuant to 35 Ill. Adm. Code 215.206(c), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall:
 - i. Collect and record the name, identification number, and volume of each touch-up and repair coating, as applied on each coating line, per eight-hour period and per month;
 - ii. Perform calculations on a daily basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for each eight-hour period;
 - iii. Perform calculations on a monthly basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for the month and the rolling twelve-month period;

- iv. Prepare and maintain at the source an annual summary of the information required to be compiled pursuant to 35 Ill. Adm. Code 215.206(b) on or before January 31 of the following year;
 - v. Maintain at the source for a minimum of three years all records required to be kept under this 35 Ill. Adm. Code 215.206(c) and make such records available to the Agency upon request.
- 13a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions in this permit:
- i. Records addressing the use of good operating practices for the paint booth filters and the afterburner associated with the burn-off oven:
 - A. Records for periodic inspection of the paint booth filters and the afterburner associated with the burn-off oven with date, individual performing the inspection and nature of the inspection; and
 - B. Records for prompt repair of defects with identification and description of defect, effect of emissions, date identified, date repaired and nature of repair.
 - ii. The name and identification number of each coating as applied;
 - iii. Coating usage (gallons/month and gallons/year);
 - iv. Solvent usage (gallons/month and gallons/year);
 - v. The VOM and HAP content of each coating and solvent used (weight percent);
 - vi. The density of each coating and solvent used (lbs/gallon);
 - vii. Natural gas usage for the burn-off oven (mmscf/month and mmscf/year); and
 - viii. Monthly and annual CO, NO_x, PM, SO₂, VOM, and HAP emissions from the source with supporting calculations (tons/month and 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.

14. Pursuant to 35 Ill. Adm. Code 215.206(c)(6), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall notify the Illinois EPA in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 l (1 quart) per eight-hour period or exceeds 209 l/yr (55 gal/yr) for any rolling twelve-month period within 30 days after any such exceedance. Such notification shall include a copy of any records of such exceedance.
- 15a. 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 deviation 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
5407 North University
Peoria, Illinois 61614

If you have any questions on this, please call German Barria at 217/785-1705.

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

Date Signed: _____

REP:GB:psj

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Air and Gas Compressors Manufacturing Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (i.e., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such 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.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						Single <u>HAP</u>	Combined <u>HAPs</u>
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>			
2 Waterbase Paint Booths			0.44			8.40		
Ortman Spray Booth			0.44			8.20		
Cleanup Solvent						4.90		
Powder Coating Line								
Burn-Off Oven	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>		-----	-----
Total	<u>0.44</u>	<u>0.44</u>	<u>1.32</u>	<u>0.44</u>	<u>21.94</u>	<u>9.0</u>	-----	<u>22.5</u>

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