

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Wheeling Service & Supply, Inc.
Attn: Larry J. Larson
15920 Nelson Road
Woodstock, Illinois 60098

Application No.: 84080068

I.D. No.: 111809AAB

Applicant's Designation:

Date Received: November 17, 2003

Subject: Coil Coating Operation

Date Issued: March 2, 2004

Expiration Date: March 2, 2009

Location: 15920 Nelson Road, Woodstock

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of Coil Coating Lines #1 and #2 with a curing oven each and both controlled by one catalytic afterburner 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., volatile organic material (VOM) to less than 25 tons per year, individual hazardous air pollutants (HAPs) to less than 10 tons per year and a combination of such HAPS to less than 25 tons per year). 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 permits for this location.
- 2a. Coil Coating line #2 is subject to a New Source Performance Standard (NSPS) for Metal Coil Surface Coating, 40 CFR 60, Subparts A and TT. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. The emissions of VOM from the Coil Coating line #2 shall not exceed 10 percent of the VOM applied for each calendar month (90 percent emission reduction), pursuant to the NSPS, 40 CFR 60.462(a)(3).
- c. At all times, the Permittee shall also, to the extent practicable, maintain and operate Coil Coating line #2, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
3. This permit is issued based upon the paint lines #1 and #2 being a subject to the VOM emission limitations of 35 Ill. Adm. Code 218.204(d). Compliance with these requirements is achieved due to the use of a capture system and control device that provides 81 percent reduction in the VOM emissions and the control device has 90 percent efficiency (35 Ill. Adm. Code 218.207(b)(1)).

4. Total combined emissions of volatile organic materials (VOM) from coil coating operations shall not exceed the following limits:

a. Coating Application:

140 lb/day, 18.8 tons/year

b. Clean-Up Operations:

15 lb/day, 2.0 tons/yr.

The emissions of VOM shall be determined from the following equation:

$$\sum (P_i \times C_i) \times (1 - C_{ef}) + \sum (S_j \times C_j)$$

Where:

P_i - Paint Usage (gal)

C_i - VOM Content of the Paint (lb/gal)

C_{ef} - 0.9 - minimum required by 40 CFR 60.462

S_j - Clean-Up Solvent Usage (gal)

C_j - VOM Content of the Solvent (lb/gal)

c. These limits define the potential emissions of the VOM and are based on the actual emissions determined from the maximum production capacity. Compliance with annual limits shall be determined using a rolling total of 365 days of data.

5. The emissions of hazardous air pollutants as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single hazardous air pollutant or 25 tons per year of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any hazardous air pollutants from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

6a. The catalytic afterburner shall be in operation at all times that coil coating is being performed.

b. The catalytic afterburner shall be operated in accordance with the requirements of 40 CFR 60.463 and 35 Ill. Adm. Code 218.105(d)(2).

i. Permanent temperature monitors shall continuously monitor and record both the temperature upstream and downstream of the catalyst bed.

ii. These monitors shall be calibrated, operated and maintained in accordance with the requirements of 40 CFR 60.463.

- c. The catalytic afterburner combustion chamber shall be preheated to at least the manufacturer's recommended temperature of 525°F before the coating process is begun. At least this temperature shall be maintained during operation.
- d.
 - i. At least once a year, the catalyst bed level in the catalytic afterburner shall be checked and recorded.
 - ii. Any addition or replacement of catalyst shall be recorded.
7. The Permittee shall collect and record the following information each day:
 - a. Name and identification number, density, and VOM and HAP content of each coating and VOM containing material used.
 - b. Usage of each coating and VOM containing material on a daily and 365 day rolling total basis.
 - c. Emissions of VOM and HAP on a daily and 365 day rolling total basis.
 - d. Afterburner monitoring data.
 - e. A log of operating time for the capture system, afterburner, monitoring devices, and the coating lines.
 - f. A maintenance log for the capture system, afterburner, and monitoring devices detailing all routine and non-routine maintenance performed including dates and duration of any outages.
8. A record shall be kept of all odor complaints received directly or referred from a responsible government agency. The Permittee shall conduct an investigation and submit a report within 10 working days to the Illinois EPA's Regional Office detailing the complaint, efforts made to identify the odor cause, and the conclusions of the investigation. The report shall include the following information:
 - a. Hourly wind speed and wind direction during the complaint time period.
 - b. Name, address, and telephone number of person making complaint, if available.
9. 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 or 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.
10. 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 exceedances or violation and efforts to reduce emissions and future

occurrences.

11. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
 - a. Names and amounts of coatings and solvents used (gal/yr) and their VOM and HAP content (lb/gal).
12. 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

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

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

DES:VJB:jar

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

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Coil 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 which results in maximum emissions from such a plant. This is assumption of 100% evaporation rate of all VOM containing materials and minimum actual control efficiency. The resulting maximum emissions are well below the level, e.g., 25 tons per year of VOM, 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.

Operations	VOM Emissions (Ton/Yr)
Coating	18.8
Clean-Up	2.0

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