

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Millennium Rail, Inc.  
Attn: John Battles  
435 Old St. Louis Road  
Wood River, Illinois 62095

Application No.: 90050107                      I.D. No.: 119115ABC  
Applicant's Designation:                      Date Received: June 6, 1995  
Subject: Painting System  
Date Issued: November 19, 1999                      Expiration Date: November 19, 2004  
Location: 435 Old St. Louis Road, Wood River

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 2 railroad car coating lines with paint arrestor/filter 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., less than 100 tons/year of volatile organic material (VOM), 25 tons/year of all hazardous air pollutants (HAP), and 10 tons/year of any single 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. Both railroad car coating lines at this source are subject to 35 Ill. Adm. Code 219.204 Subpart F: Coatings Operations. The Permittee shall comply with Subpart F by means of 35 Ill. Adm. Code 219.205(b)(1). This section states that no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204(j)(4)(A) shall apply coatings to miscellaneous metal parts or products on the coating line unless, for each coating line which applies multiple coatings, all of which are subject to the same numerical emission limitation of 35 Ill. Adm. Code 219.204(j) during the same day, the daily-weighted average VOM content shall not exceed the coating VOM content limit of 3.5 lb VOM per gallon of coating.

3. Emissions and operation of the coating lines shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Paint Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Old Coating Line	154	1,543	0.27	2.7
New Coating Line	<u>4,990</u>	<u>49,885</u>	<u>8.73</u>	<u>87.3</u>
Totals	5,144	51,428	9.0	90

These limits are based on the maximum annual paint usage indicated the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. Total plant solvent usage and emissions shall not exceed the following limits:

<u>Solvent Usage/Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
0.90	9.0

These limits are based on the maximum annual solvent usage indicated in the permit application, a 100% VOM/HAP content, and a 100% evaporative loss. Annual usage shall be determined by the amount of solvent purchased over the calendar year. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. Emissions and operation of the railcar coating systems with paint arrestor/filter units shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Hours of Operation</u> <u>(Hours/Year)</u>	<u>Process Weight Rate Paint</u> <u>(Lbs/Hr)</u>	<u>Particulate Matter Emissions</u>	
			<u>(Lbs/Hr)</u>	<u>(Tons/Yr)</u>
Old Coating Line	8,760	150	0.64	2.79
New Coating Line	8,760	208.4	0.76	3.33

These limits are based on the maximum process weight rate indicated in the permit application, the maximum allowable hourly emission rate pursuant to Ill. Adm. Code 212.321, and maximum hours of operation. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. 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.

7. Pursuant to 35 Ill. Adm. Code 219.211(d)(2) the Permittee shall collect and record all of the following information each day for both of the coating lines:
  - a. The name and identification number of each coating as applied on each coating line;
  - b. 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 the coating lines; and
  - c. The daily-weighted average VOM content of all coatings as applied on the affected coating line. The daily-weighted average shall be determined by the following equation, as defined in 35 Ill. Adm. Code 211.1670:

$$VOM_W = \left[ \sum_{i=1}^n V_i C_i \right] / V_T$$

Where:

- $VOM_W$  = The average VOM content of two or more coatings as applied each day on the coating line in units of lb VOM/gallon of coating (minus water and any compounds which are specifically exempted from the definition of VOM);
- $n$  = The number of different coatings as applied each day on a coating line;
- $V_i$  = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on coating line in units of gallons;
- $C_i$  = The VOM content of each coating as applied each day on a coating line in units of lb VOM/gallon of coating; and

$V_T$  = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line units of gallons.

8. In addition, the Permittee shall maintain monthly records of the following items:
  - a. Clean-up solvent usage (gallon/month and gallon/year);
  - b. Density of each clean-up solvent applied (lb/gallon);
  - c. VOM and HAP content of each clean-up solvent applied (lb/gallon);
  - d. Coating usage of each coating applied (gallon/month and gallon/year);
  - e. Density of each coating applied (lb/gallon);
  - f. VOM and HAP content of each coating applied (lb/gallon);
  - g. Total VOM and HAP emissions from both of the coating lines (tons/month and tons/year) calculated based on the recordkeeping requirements and compliance procedures; and
  - h. Process weight rate of paint (lb/hour).
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 or USEPA 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 exceedance or violation and efforts to reduce emissions and future occurrences.

11. 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  
2009 Mall Street  
Collinsville, Illinois 62234

12. Annual emissions of regulated air pollutants shall not exceed 99 tons of VOM, 25 tons of all HAPs combined and 10 tons of any single HAP, which shall be the permitted emissions for this site.

It should be noted that one of the sandblasting units has been removed.

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

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

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

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cc: Illinois EPA, FOS Region 3  
Illinois EPA, Compliance Section  
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 well below the levels, e.g., 100 tons per year of VOM, 25 tons per year of all HAPs combined, and 10 tons per year of any single 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, less paints and solvents are used, and control measures are more effective than required in this permit.

1. Emissions and operation of the coating lines shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Paint Usage</u>		<u>Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Old Coating Line	154	1,543	0.27	2.7
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Totals	5,144	51,428	9.0	90

These limits are based on the information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

2. Total plant solvent usage and emissions shall not exceed the following limits:

<u>Solvent Usage/Emissions</u>	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
0.90	9.0

These limits are based on the maximum annual solvent usage indicated in the permit application, a 100% VOM/HAP content, and a 100% evaporative loss. Annual usage shall be determined by the amount of solvent purchased over the calendar year. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. Emissions and operation of the railcar coating systems with paint arrestor/filter units shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Hours of</u>	<u>Process Weight</u>	<u>Particulate Matter</u>	
	<u>Operation</u>	<u>Rate Paint</u>	<u>Emissions</u>	
	<u>(Hours/Year)</u>	<u>(Lbs/Hr)</u>	<u>(Lbs/Hr)</u>	<u>(Tons/Yr)</u>
Old Coating Line	8,760	150	0.64	2.79
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4. 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.

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