

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE
RENEWAL

PERMITTEE

Clybourn Metal Finishing
Attn: William G. Romaniuk
2240 North Clybourn
Chicago, Illinois 60614

Application No.: 73032121

I.D. No.: 031600CUW

Applicant's Designation:

Date Received: September 14, 2000

Subject: Vapor Degreaser

Date Issued:

Expiration Date:

Location: 2240 North Clybourn Street, Chicago, 60614

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of an open top vapor degreaser pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons per year of volatile organic material (VOM), 25 tons per year of combined hazardous air pollutants (HAPs), and 10 tons per year of a 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. The halogenated solvent cleaning machine(s) are subject to 40 CFR part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning. The Illinois EPA is administering this regulation in Illinois on behalf of the United States EPA under a delegation agreement. The United States EPA issued this final rule on December 2, 1994.
 - b. The Permittee must be in compliance with 40 CFR Part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning on or before December 2, 1997.
 - c. Maintain a log of solvent additions and deletions for each solvent cleaning machine.

- d. Pursuant to 40 CFR Part 63.465(b), the Permittee shall on the first operating day of every month ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.
- e. Pursuant to 40 CFR Part 63.465(c), the Permittee shall on the first operating day of the month comply with the following requirements:
 - i. Using the records of all solvents additions and deletions for the previous monthly reporting period, determine solvent emissions (E) using the equation in Condition 2(b).
 - ii. Determine SSR, using the following method:
 - A. From test conducted using EPA reference method 25d.
 - B. By engineering calculations included in the compliance report.
 - iii. Determine monthly rolling average, EA, for the 3-month period ending with the most recent reporting periods using the following equation:

$$EA_i = \frac{\sum_{j=1}^3 E_i}{3}$$

Where: EA_i = The average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods, (pounds of solvent per square feet of solvent/air interface area per month).

j=1 = the most recent monthly reporting period.

j=2 = the monthly reporting period immediately prior to j=1.

j=3 = the monthly reporting period immediately prior to j=2.

- 3a. The emissions and operation of each solvent cleaning machine shall not exceed the following limits, pursuant to 40 CFR Part 63.464(a)(1):

<u>Type of Machine</u>	<u>Solvent-Air Interface Area (Ft²)</u>	<u>Organic Material Emissions 3-Month Rolling Average Monthly Emissions</u>	
		<u>(Lb/Month)</u>	<u>(Ton/Year)</u>
Batch Vapor	28.3	870	5.2

These limits are based on the type of solvent cleaning machine, solvent-air interface area, and determined by using equation in Condition 2b.

- b. For determination with the limits of this permit, halogenated solvent usage shall be determined by the following equation, pursuant to 40 CFR Part 63.465(c)(1). E, SA, LSR, SSR, and AREA shall be determined on the first operating day of each month.

$$E = (SA - LSR - SSR) / AREA$$

Where:

- E = The total halogenated HAP solvent emissions from the solvent cleaning machine during the current month (lb/ft²).
- SA = The total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the current month (lb/month). Solvent addition up to pre marked fill line is required to maintain the same level at the beginning of each month before the calculation.
- LSR = The total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the current month (lb/month). Solvent is removed only when it is necessary to remove.
- SSR = The total amount of halogenated HAP solvent removed from the solvent cleaning machine solid waste during the current month (lb/month). This shall be determined by engineering calculation or by EPA test method 25D.
- AREA = The solvent-air interface area of the solvent cleaning machine (ft²).

- 4a. The Permittee shall retain the following records on paper or computer disk for five years, pursuant to 40 CFR Part 63.467(c):
- i. Record the date and amount of solvent added (SA) to each solvent cleaning machine.
 - ii. Record the date and amount of halogenated HAP solvent removed (LSR) from each solvent cleaning machine.

- iii. The amount of solvent removed(SSR) from the waste of each cleaning machine. Analysis sheet (EPA test method 25D) or calculation shall be retained.
 - iv. Calculation sheet showing how the monthly emissions and the 3-month rolling average monthly emissions were determined.
 - v. Emissions of organic material (lb/month).
 - vi. Emissions of organic material (ton/year).
- b. Any records by this permit shall be readily available for inspection and copying by the Illinois EPA.
5. The Permittee shall comply with the following reporting requirements pursuant to 40 CFR. Part 63.468.
- a. An initial statement of compliance report, pursuant to 40 CFR Part 63.468(e), demonstrating each existing solvent cleaning machine is in compliance by December 2, 1997, must be submitted no later than May 1, 1998. For new solvent cleaning machine compliance report shall be submitted no later than 150 days after startup. Any machine installed on or before November 29, 1993, is considered as existing machine and installed after November 29, 1993, is considered as new machine. The initial compliance report shall include the following:
 - i. Name and address.
 - ii. Facility location address.
 - iii. The solvent-air interface area for each solvent cleaning machine.
 - iv. The results of the first 3-month average emission calculation.
 - b. A solvent emission report, pursuant to 40 CFR Part 63.468(g), shall be submitted for each batch vapor or in-line solvent cleaning machine. The solvent emission report shall contain the following:
 - i. The size (air-interface area or capacity) and type (batch vapor or in-line) for each solvent cleaning machine.
 - ii. The average monthly solvent consumption for the solvent cleaning machine in lb/month.

- iii. The 3-month rolling average monthly emission estimate calculated for each month.
 - c. An exceedance report, pursuant to 40 CFR Part 63.468(h), shall be submitted every 6 months if there is not an exceedance, and every 3 months if there is an exceedance. If an exceedance did not occur the report would consist of a statement certifying that there was no exceedance. The frequency of exceedance report will increase to quarterly after an exceedance occurs. The frequency can be reduced to every six month upon approval from the Illinois EPA provided no exceedance has occurred during the last one year. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the following:
 - i. If an exceedance has occurred, the reason for the exceedance.
 - ii. If no exceedance has occurred, such information shall be stated in the report.
 - d. The Permittee shall submit exceedance report 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.
 - e. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least 5 years, unless specifically stated in the permit from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in a computer shall be cable 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.
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. 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.

8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. 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

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: amount of solvent purchased (tons/month and tons/year) and amount of solvent recovered and shipped off (tons/month and tons/year).

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

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

DES:RBS:psj

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

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the open top batch vapor degreaser 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., 10 tons per year of a single hazardous air pollutant (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.

- 1a. The emissions of each solvent cleaning machine shall not exceed the following limits, pursuant to 40 CFR Part 63.464(a)(i):

Organic Material Emissions 3-Month Rolling Average Monthly Emissions	
<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
870	5.2

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

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