

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Jarke Corporation  
Attn: Mr. Frank Sroka, Vice President  
6333 West Howard Street  
Niles, Illinois 60714

Application No.: 95100060                      I.D. No.: 031201ADQ  
Applicant's Designation: JARKE-CORP      Date Received: November 19, 2001  
Subject: Industrial Rack Manufacturer  
Date Issued:                                      Expiration Date:  
Location: 6333 West Howard, Niles

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a boiler, a gas dryer, a mig welding line, and two paint spray booths with water spray control 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/yr for volatile organic material (VOM), 10 tons/yr for any single HAP and 25 tons/yr for combined HAPs). 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. Pursuant to 35 Ill. Adm. Code 218.204(j)(2) the VOM content of the paint "as applied" shall not exceed 3.5 lb/gal (minus water and any compounds which are specifically exempt from the definition of VOM).
- 3a. Emissions and operation of the paint spray booths and paint gun cleaner shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u> (Gal/Mo)(Gal/Yr)		VOM	VOM Emissions	
			<u>Content</u> (Lb/Gal)	(Ton/Mo)	(Ton/Yr)
Coatings	1,083.4	13,000	3.5	1.9	22.80

Clean-Up Solvent	13.9	166	7.5	0.05	0.63
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These limits are based on maximum material usage (gal/month and gal/yr) and maximum VOM content (lb/gal).

- b. 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.

<u>Item</u>	<u>HAPs Emissions</u>	
	<u>(Ton/Month)</u>	<u>(Tons/Year)</u>
Individual HAP	0.80	9.5
All HAPs	1.95	23.4

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

- c. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 4. The Permittee shall maintain records of the following items for the paint spray booths:
  - a. The name and identification number of each coating as applied on each coating line.
  - b. The weight of VOM per volume (lb/gal) of each coating (minus water and any compounds which are specifically exempt from the definition of VOM) as applied each day on each coating line.
  - c. Paint and solvent usage (gal/mo and gal/yr).
  - d. VOM content of clean-up solvents (lb/gal).
  - e. The name and HAP content (lb/gal) of each HAP for each coating, solvent and any other material used containing HAPs.
- 5. 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 and 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.
- 6. Pursuant to 35 Ill. Adm. Code 212.322, particulate matter emissions from the 2 paint spray booths shall not exceed the allowable emissions rate of 2.15 lb/hr and 2.24 tons/year from each emissions unit based on each unit operating 2,080 hr/yr and the process weight rate of each emission

unit not exceeding 765 lb/hr or 0.38 ton/hr.

7. Emissions and operation of the boiler and gas dryer (combined) shall not exceed the following limits:

<u>Pollutant</u>	<u>Natural Gas Consumption</u> (mmscf/Mo) (mmscf*/Yr)		<u>Emissions</u> (Ton/Mo) (Ton/Yr)	
	2	18		
	<u>Emission Factor</u> (Lb/mmscf)			
NO <sub>x</sub>	100		0.1	0.9
CO	84		0.1	0.8

\* 1 mmscf = 10,200 therms

These limits are based on maximum natural gas consumption and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

8. This permit is issued based on negligible emissions of particulate matter from mig welding line. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
9. The Permittee shall maintain records of the following items for the boiler and natural gas dryer:
- a. Total natural gas usage (mmscf/month and mmscf/year).
10. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
11. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, pursuant to 35 Ill. Adm. Code 218.211(c)(3) the Permittee shall submit a report to the Illinois EPA's Compliance Unit 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.
12. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- a. Paint and solvent usage (gal/month and gal/yr).

- b. Total natural gas usage (mmscf/month and mmscf/yr).
- c. Emissions of each criteria pollutant, each single HAP, and combined HAPs (ton/mo and ton/yr).

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

13. 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)  
1340 North Ninth Street  
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 Jim Kallmeyer at 217/782-2113.

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

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cc: IEPA, FOS Region 1  
IEPA, Compliance Unit  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from an industrial rack 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. This is a maximum usage of VOM and HAP containing material from the paint booths. The resulting maximum emissions are well below the levels, e.g., 25 tons/yr for VOM, 10 tons/yr for any single HAP, and 25 tons/yr for combined 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 VOM containing material is less than that required in this permit.

1. Emissions and operation of the paint spray booths and paint gun cleaner shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Material Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Content (Lb/Gal)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Paint Spray Booths	1,083.4	13,000	3.5	1.9	22.80
Paint Gun Cleaner	13.9	166	7.5	0.05	0.63

These limits are based on maximum material usage (gal/month and gal/yr) and maximum VOM content (lb/gal).

2. Emissions and operation of the boiler and gas dryer (combined) shall not exceed the following limits:

<u>Pollutant</u>	<u>Natural Gas Consumption</u>		<u>Emissions</u>	
	<u>(mmscf/Mo)</u>	<u>(mmscf*/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
	2	18		
	<u>Emission Factor</u>			
	<u>(Lb/mmscf)</u>			
NO <sub>x</sub>	100		0.1	0.9
CO	84		0.1	0.8

\* 1 mmscf = 10,200 therms

These limits are based on maximum natural gas consumption and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. 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.

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Individual HAP	0.80	9.5
All HAPs	1.95	23.4

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

4. Pursuant to 35 Ill. Adm. code 212.322, particulate matter emissions from the 2 paint spray booths shall not exceed the allowable emissions rate of 2.15 lb/hr and 2.24 tons/year from each emissions unit based on each unit operating 2,080 hr/yr and the process weight rate of each emission unit not exceeding 765 lb/hr or 0.38 ton/hr.
5. This permit is issued based on negligible emissions of particulate matter from mig welding line. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

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## PROJECT SUMMARY

### I. INTRODUCTION

Jarke Corporation has submitted an application to renew their Federally Enforceable State Operating Permit (FESOP) which contains limitations on material usage and air emissions for their warehouse storage equipment manufacturing plant located at 6333 West Howard Street in Niles. These limits prevent the site from being classified as a major source of air emissions, making it unnecessary to obtain a federal permit under the Clean Air Act Permit Program (CAAPP). The FESOP limitations, which are enforceable both by the State of Illinois and the USEPA, are accompanied by recordkeeping and reporting requirements to ensure the site is operated as a non-major source.

### II. SOURCE DESCRIPTION

Jarke Corporation manufactures industrial racks and storage equipment for warehouses. The facility operates a boiler, welding line, two spray paint booths, and a dryer.

### III. EMISSIONS

Emissions of volatile organic material (VOM) and hazardous air pollutants (HAPs) result primarily from operation of the spray booths and from use of clean-up solvents to clean the spray guns. Small amounts of particulate matter (PM) are emitted from the spray booths and from the welding line. Emissions of nitrogen oxide (NO<sub>x</sub>) and carbon monoxide (CO) occur as products of natural gas combustion in the dryer and boiler.

The FESOP limits the potential annual emissions of VOM, single HAP, and combination of HAPs from this facility to levels below major source thresholds, classifying it as a non-major source.

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with Illinois Pollution Control Board emission standards, which represent the basic requirements for all sources in Illinois. This plant readily complies with the Board standards for all criteria pollutants and HAPs.

### V. PROPOSED PERMIT

The conditions of the FESOP constitute limitations ensuring this plant will be operated as a non-major source. These conditions limit the amount of materials, including coatings, thinners, and clean-up solvents, which may be used. These limitations are consistent with the historical operation and capacity of the plant. The permit conditions also establish appropriate compliance procedures, including

recordkeeping and reporting requirements. Jarke Corporation must carry out these procedures on a continual basis to demonstrate their equipment is operating within the limitations established by the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's determination that this source meets all applicable state and federal air pollution control requirements, subject to the conditions of the proposed renewal permit. The Illinois EPA, therefore, proposes to renew the federally enforceable limits for the above referenced equipment to Jarke Corporation.

Comments are requested on the proposed conditions of this permit renewal by the Illinois EPA. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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