



B. Extreme Performance Top Coat (air-dried)

0.52 kg/liter                      4.3 lbs/gallon

C. Final Repair Coat (air-dried)

0.58 kg/liter                      4.8 lbs/gallon

b. The Permittee shall maintain data on the VOM contents of the representative coatings as applied, determined by laboratory analysis in accordance with 35 Ill. Adm. Code 215.208(a). This data shall include the VOM content of the coatings, a justification why the coatings are representative, a description of the sampling procedures and documentation of analysis.

3a. Usage of VOM and VOM Emissions from exterior and interior painting, including thinners and cleaning solvents, shall not exceed the following limits:

Total Usage and Emissions of VOM	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
15	90

These limits are based on the maximum amount of paints used for processing maximum number of railcars and material balance. Compliance with the annual limits shall be determined from a running total of 12 months of data.

b. Emissions and operation of all natural gas combustion equipment shall not exceed the following limits:

Fuel Usage		<u>Pollutant</u>	Emissions	
<u>(mmscf/Month)</u>	<u>(mmscf/Year)</u>		<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
18.6	186	NO <sub>x</sub>	1.0	9.3
		CO	0.8	7.8
		PM	0.14	1.36
		VOM	0.1	1.0

These limits are based on standard AP-42 emission factors for natural gas combustion (Section 1.4 of AP-42), maximum firing rates, maximum hours of operation, and a conversion factor of 1,000 Btu/scf. Compliance with annual limits shall be determined from a rolling total of 12 months of data.

c. Natural gas shall be the only fuel fired in the fuel combustion equipment at this facility.

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.

- 5a. 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.
- b. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.
- i. The name, type, and identification number of each coating used, including thinners and cleaning solvents
  - ii. Volatile organic material (VOM) content of each coating, including the description of methods and procedures used to determine VOM content (lbs/gallon of coating, as applied).
  - iii. The amount of each coating used (gallons/month and gallons/year).
  - iv. Natural gas usage (mmscf/month and mmscf/year).

- v. Monthly and annual NO<sub>x</sub>, CO, VOM, PM, and SO<sub>2</sub> emissions with supporting calculations and documentation (tons/month and tons/year).
- c. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five 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.
- 7. If there is a deviation 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 deviation. The report shall include the emissions released, a copy of the relevant records, and a description of the deviation and efforts to reduce emissions and future occurrences.
- 8. Two (2) copies of required reports 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

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

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

DES:CPR:KMP:psj

cc: Illinois EPA, FOS Region 3  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum VOM emissions from railcar repair yard 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. By limiting the total plant wide VOM usage to less than 90 tons per year and material balance, the maximum emissions are kept below the applicable Clean Air Act Permit Program (CAAPP) threshold, e.g., 100 tons/year of VOM emissions at which this source would be considered a major source for purposes of the. 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)				
	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Interior and Exterior Painting Operations (Materials: Coatings Including Thinners & Solvents)			90		
All Fuel Combustion Equipment (Natural Gas Fired)	9.3	7.8	1		
Totals	9.3	7.8	91	<u>&lt; 10</u>	<u>&lt; 25</u>

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