

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
REVISED

PERMITTEE

E. D. Etnyre
Attn: Matt Reynolds
1333 Daysville Road
Oregon, Illinois 61061

Application No.: 91010037
Applicant's Designation: 99UPDATE
Subject: Surface Preparation
Date Issued: November 23, 1999
Location: 1333 Daysville Road, Oregon

I.D. No.: 141817AAQ
Date Received: September 27, 1999
Expiration Date: March 21, 2001

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three spray paint booths, a surface preparation process, a welding operation, and a natural gas-fired forge 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., 10 tons/year for a single HAP, 25 tons/year for total HAPs, and 100 tons/year for volatile organic material). 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 Ill. Adm. Code 215.204(j)(3), the VOM content of the coating used in the three (3) spray paint booths may not exceed 3.5 lb/gallon (minus water and any other compound specifically exempted from the definition of VOM).
- 3a. Operation and emissions of hazardous air pollutants (HAP) and volatile organic material (VOM) from the three spray paint booths and the surface preparation process shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>Single HAP¹</u>		<u>Total HAP</u>		<u>VOM</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Coating Systems	2,000	17,400	0.96	8.35	1.80	15.7	3.5	30.5
Clean-Up Solvents	400	3,000	0.2	0.90	0.25	1.88	0.28	2.07
Surface Preparation Component A	100	1,000	0.05	0.55	0.11	1.14	0.29	2.95
Surface Preparation Component B	100	1,000	----	----	0.02	0.2	0.32	3.20
Welding Operation	-----	-----	----	----	----	<u>1.25</u>	----	----
				Totals	9.8	20.17		
	39.7							

¹ Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., xylene).

- b. This table defines the potential emissions of HAPs and VOM and is based upon the maximum actual emissions resulting from the maximum coating and cleanup solvent usage, the average single HAP and total HAP contents, and the maximum allowable VOM content for the coating. Emissions from the maximum clean-up solvent usage are based on 60% of the solvent recovered. Emissions from the welding operation is based on AP-42 emission factors.
- c. Compliance with the annual limits of this condition shall be determined from a running total of 12 months of data.
- 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.
- 5. This permit is issued based on negligible emissions of nitrogen oxides and carbon dioxide from the natural gas-fired forge. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 6a. Within 90 days of a written request from the Agency, tests shall be performed which will allow evaluation of the representative coatings "as

applied" in order to determine compliance with the requirements of Special Condition Nos. 2 and 3.

- b. These tests shall be performed by an approved independent laboratory by the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 215.105.
- c. The submitted data shall include the following:
 - i. The VOM content of the representative coatings (minus water and exempt compounds) "as applied" (pounds per gallon);
 - ii. The HAP content of the representative coatings (minus water) "as applied" (pounds per gallon);
 - iii. A justification why the coatings are representative;
 - iv. A description of the sampling procedures; and
 - v. Documentation for the analysis.
- 7. The Final Report(s) for all tests shall be submitted within 180 days after the date of the test. The Final Report shall include as a minimum:
 - a. General information describing the test, including the name and identification of the emission source which was tested, date of test, name of personnel performing the tests, and Agency observers, if any;
 - b. A summary of results;
 - c. Description of test procedures, including description of test equipment, and test schedule;
 - d. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- 8. The Permittee shall maintain records of the following items for the source:
 - a. The name and identification number of each coating as applied;
 - b. The weight of VOM per volume of each coating (minus water any compounds which are specifically exempted from the definition of VOM) as applied each month;
 - c. The weight of HAPs per volume of each coating (minus water) as applied each month;
 - d. The usage of coatings in the three spray paint booths, gallons/month and gallons/year (running total);

- e. The usage of clean-up solvent in the three spray paint booths, gallons/month and gallons/year (running total);
 - f. The amount of clean-up solvent recovered from the three paint spray booths, gallons/month and gallons/year (running total);
 - g. Emissions of HAPs, tons/month and tons/year (running total); and
 - h. Usage of natural gas (mmscf/mo and mmscf/yr).
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
5415 North University
Peoria, Illinois 61614
12. Annual emissions of regulated air pollutants shall not exceed 10 tons/year of any single HAP, 25 tons/year of total HAPs, and 100 tons/year of VOM, which shall be the permitted emissions for this site.

13. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
 - a. Coating usage (gallons/year); and
 - b. If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

It should be noted that the two shot blast units, two shotblasting units, and twelve cutting torches are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa).

It should be noted that this permit has been revised to show the operation of a Surface Preparation process and to show a decrease in usage of coating and clean-up solvent in the three Spray Paint Booths. The allowable emissions by this permit have not increased, and this permit continues to assure that this source would not be a major source for purposes of CAAPP.

It should be noted that this permit has been revised to allow usage of Component B of the surface preparation, to show emissions of HAPs from the welding operation, and to include a natural gas-fired forge.

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

DES:NAF:psj

cc: Illinois EPA, FOS Region 2
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the source 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/year of any single HAP, 25 tons/year of total HAPs, and 100 tons/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 less material is handled, and control measures are more effective than required in this permit.

- Emissions of hazardous air pollutants (HAP) and volatile organic material (VOM) from the three spray paint booths shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>Single HAP¹</u>		<u>Total HAP</u>		<u>VOM</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Coating Systems	2,000	17,400	0.96	8.35	1.80	15.7	3.5	30.5
Clean-Up Solvents	400	3,000	0.2	0.90	0.25	1.88	0.28	2.07
Surface Preparation Component A	100	1,000	0.05	0.55	0.11	1.14	0.29	2.95
Surface Preparation Component b	100	1,000	----	----	0.02	0.2	0.32	3.20
Welding Operating	-----	-----	----	----	----	<u>0.71</u>	----	----
				<u>Totals</u>	9.8	19.63		
	39.7							

¹ Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., xylene).

This table defines the potential emissions of HAPs and VOM and is based upon the maximum actual emissions resulting from the maximum coating and cleanup solvent usage, the average single HAP and total HAP contents, and the maximum allowable VOM content for the coating. Emissions from the maximum clean-up solvent usage are based on 60% of the solvent recovered.

- 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.

NAF:psj