

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Dynaweld, Inc.
Attn: John H. Bauer
406 North Highland Avenue
Aurora, Illinois 60506

Application No.: 91110045
Applicant's Designation: IEPAAP942
Subject: Trailer Manufacturing Plant
Date Issued: November 14, 2000
Location: 631 West Plum Avenue, Aurora

I.D. No.: 089005AIA
Date Received: June 13, 2000
Expiration Date: November 14, 2005

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five trailers and trailer parts paint booths controlled by filters 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 volatile organic material (VOM) and hazardous air pollutants (HAPs) from the source to less than major source thresholds (i.e., 25 tons/year for VOM, 10 tons/year for a single HAP and 25 tons/year for totaled 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 for this location.
2. This permit is issued based upon the paint booths being subject to the VOM control requirements of 35 Ill. Adm. Code Part 218 Subpart F: "Coating Operations". Compliance with these requirements is achieved due to usage of compliance coating according to the VOM content limitations of Sections 218.204(j)(2)(A) of 3.5 lb/gal of coating as applied minus water and any exempt compounds which are specifically exempted from the definition of VOM.
- 3a. Total combined emissions of VOM from painting and clean-up operations shall not exceed 24.5 tons/year.
- b. The emissions of VOM shall be determined from the following equation on

a daily basis:

$$3 (P_i \times C_i) + 3 (S_j \times C_j)$$

Where:

P_i - Paint Usage (gal/day);

C_i - VOM Content of the Paint (lb/gal);
 S_j - Clean-up solvent usage (gal/day);
 C_j - VOM content of the solvent (lb/gal).

- c. The emissions of 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 by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
- d. These limits define the potential emissions of the VOM and HAPs and are based on the actual emissions determined from maximum production capacity.
- e. Compliance with annual limits shall be determined from a running total of 365 days of data.
4. This permit is issued based on negligible emissions of particulate matter the five paint booths. For this purpose, emissions from each emission source shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.
5. No person shall cause or allow any visible emissions of particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
- 6a. The Permittee shall maintain daily records of the following items:
 - i. The name and identification number of each coating as applied;
 - ii. The usage of coating and clean-up solvents (gal/day) and their VOM content (lb/gal);
 - iii. The VOM emissions for current day (lb/day) and total running for last 365 days (ton/year).
- b. The Permittee shall maintain monthly records of the following items:
 - i. The name and identification number of each coating used;
 - ii. The usage of coating and clean-up solvents (gal/month) and their HAP content (lb/gal);
 - iii. The emission of any single HAP exceeding 0.5 ton/month and total HAP emission for current month and total running for last 12

months (ton/year).

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 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.

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 exceedances or violation and efforts to reduce emissions and future occurrences.
9. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year:
 - a. Names and amounts of coatings and solvents used (gal/year);
 - b. Their VOM and HAP content (lb/gal);
10. 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 Illinois
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 Illinois
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that the shot blasting machine is exempt from state permit requirements pursuant to 35 Ill. Adm. Code 201.146(aa).

If you have any questions on this permit, please call Valeriy Brodsky at 217/785-5151.

Donald E. Sutton, P.E.
Manager, Permit Section

Division of Air Pollution Control

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

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the trailer 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 an assumption of 100% evaporation rate of all VOM contained in the paints and clean-up solvents. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled 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 material is handled, and control measures are more effective than required in this permit.

- 1a. Total combined emissions of VOM from painting and clean-up operations shall not exceed 24.5 tons/year.
- b. The emissions of VOM shall be determined from the following equation on a daily basis:

$$3 (P_i \times C_i) + 3 (S_j \times C_j)$$

Where:

P_i - Paint usage (gal/day);
 C_i - VOM content of the paint (lb/gal);
 S_j - Clean-up solvent usage (gal/day);
 C_j - VOM content of the solvent (lb/gal).

Compliance with annual limits shall be determined from a running total of 365 days of data.

2. The emissions of 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 by rule which would require the Permittee to obtain a Clean Air Act Permit Program 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 Clean Air Act Permit Program permit from the Illinois EPA.
3. This permit is issued based on negligible emissions of particulate matter the five paint booths. For this purpose, emissions from each emission source shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.

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