

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Forest City Technologies - IL  
Attn: Gary Thomas  
299 Clay Street  
Wellington, Ohio 44090

Application No.: 05080079

I.D. No.: 201030BBT

Applicant's Designation:

Date Received: August 25, 2005

Subject: Coating Metal Fasteners and Bolts

Date Issued:

Expiration Date:

Location: 892 Southrock Drive, Rockford, Winnebago County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 11 metal coating lines, one stripper unit, one bucket cleaner, and all natural gas combustion equipment (ovens, space heaters, etc.) 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 of each single hazardous air pollutant (HAP) and 25 tons/year of 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.
- 2a. This permit is issued based on the coating operations being exempted from the requirements of 35 Ill. Adm. Code Part 215, Subpart F, Coating Operations, pursuant to provision of 35 Ill. Adm. Code 215.206 (a)(1): Total emissions of volatile organic material (VOM) from the coating plant, including all coating lines, all cleaning activities and all other emission units, shall not exceed 25 tons per year in the absence of air pollution control equipment.
- b. This permit is issued based on the potential emissions of HAPs from this source being limited to less than major source thresholds in Condition 3, thereby exempting this source from being subject to the National Emission Standards for HAPs (NESHAP), 40 CFR 63, Subpart M for Surface Coating of Miscellaneous Metal Parts and Products.

- 3a. Emissions of VOM and HAPs from the source including the 11 metal coating lines, stripper unit, bucket cleaner, and all paint stripping and solvent cleaning activities, shall not exceed the following limits:

Single HAP Emissions		VOM and Combined HAPs Emissions	
<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
1.0	9.9	2.5	24.5

These limits are based on maximum material usage and VOM and HAP contents, and all VOM and HAPs evaporated except for VOM and HAPs that are certified as reclaimed and shipped off site.

- 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.
- c. This permit is issued based on negligible emissions of particulate matter (PM) from the entire plant. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- d. Compliance with annual limits shall be determined from a running total of 12 months of data.
4. Emissions and operation of all natural gas combustion equipment (ovens, space heaters, etc.) shall not exceed the following limits:

Maximum Firing Rate of All Equipment <u>(mmBtu/Hour)</u>	E M I S S I O N S		
	<u>NO<sub>x</sub></u> <u>(Tons/Year)</u>	<u>VOM</u> <u>(Tons/Year)</u>	<u>CO</u> <u>(Tons/Year)</u>
3.9	1.7	0.1	1.4

These potential limits are based on maximum firing rate, 8,760 operating hours per year and emission factors from Tables 1.4-1 and 1.4-2 of AP-42. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 5a. At all times the Permittee shall, to the extent practicable, maintain and operate all equipment in a manner consistent with good air pollution control practice for minimizing emissions.
- b. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

6. The stripper unit, bucket cleaner and all other solvent cleaning machines and activities are subject to 35 Ill. Adm. Code Part 215, Subpart E, Section 182:
  - a. Operating Procedures: No Person shall operate a cold cleaning degreaser unless:
    - i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
    - ii. The cover of the degreaser is closed when parts are not being handled; and
    - iii. Parts are drained until dripping ceases.
  - b. Equipment Requirements: No person shall operate a cold cleaning degreaser unless:
    - i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights, or a powered system if:
      - A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);
      - B. The solvent is agitated; or
      - C. The solvent is heated above ambient room temperature;
    - ii. The degreaser is equipped with a facility for draining cleaned parts. The drainage facility shall be constructed so that parts are enclosed under the cover while draining unless:
      - A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
      - B. An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.
    - iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point:

- A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
  - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
  - iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
  - v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
7. 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.
- a. Solvent used and VOM and HAP contents, for all cleaning activities (tons/month and tons/year, weight %);
  - b. The amount (gallons/month) and density (lbs/gallon) of each coating as applied;
  - c. The HAP and VOM content (weight %) of each coating as applied, minus water;
  - d. Certified records of amount and VOM and HAP contents of materials reclaimed and shipped off-site (tons/month, tons/year, and weight percent); and
  - e. The total HAP and VOM emissions from the source (tons/month and tons/year), including supporting calculations.
8. 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.
9. If there is an exceedance of or deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.

10. Two (2) copies of required reports and notifications 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

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 2  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating 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. The resulting maximum emissions are below the levels (e.g., 25 tons/yr combined HAPs, and 10 tons/year of each single 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.

<u>Equipment</u>	<u>VOM (Tons/Yr)</u>	<u>HAPs</u>		<u>NO<sub>x</sub> (Tons/Yr)</u>	<u>CO (Tons/Yr)</u>
		<u>Combined (Tons/Yr)</u>	<u>Single (Tons/Yr)</u>		
All Coating & Cleaning	24.5	24.5	9.9		
Natural Gas Combustion	<u>0.1</u>			<u>1.7</u>	<u>1.4</u>
Totals	<u>24.6</u>	< 25	< 10	<u>1.7</u>	<u>1.4</u>

RBS:psj