

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Wastequip St. Louis
Attn: Rick Daudert
2701 Converse Avenue
East Saint Louis, Illinois 62207

Application No.: 04090024

I. D. No.: 163045AGI

Applicant's Designation:

Date Received: July 30, 2008

Subject: Two Spray Booths

Date Issued: July 1, 2014

Expiration Date: July 1, 2024

Location: 2701 Converse Avenue, East Saint Louis, St. Clair County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of two (2) 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:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/yr for any combination of such 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.
 - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm.
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.

- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the emission source.
- d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
- 3a. Pursuant to 35 Ill. Adm. Code 219.204(q)(1), except as provided in 35 Ill. Adm. Code 219.205, 219.207, 219.208, 219.212, 219.215 and 219.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for miscellaneous metal parts and products coatings. Except as otherwise provided in 35 Ill. Adm. Code 219.204(a), (c), (g), (h), (j), (l), (n), (o), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied, at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM. should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code Part 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 219.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 219.211(c) except where noted. The emission limitations are as follows:

Miscellaneous Metal Parts and Products Coatings and Plastic Parts and Products Coatings On and After May 1, 2012. On and after May 1, 2012, the owner or operator of a miscellaneous metal or plastic parts coating line shall comply with the limitations 35 Ill. Adm. Code 219.204(q). The limitations in 35 Ill. Adm. Code 219.204(q) shall not apply to aerosol coating products, powder coatings, or primer sealants and

ejection cartridge sealants used in ammunition manufacturing. Primer sealants and ejection cartridge sealants shall instead be regulated under 35 Ill. Adm. Code Part 219 Subpart TT.

Metal Parts and Products. For purposes of this 35 Ill. Adm. Code 219.204(q)(1), "corrosion resistant basecoat" means a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance. The limitations in 35 Ill. Adm. Code 219.204(q)(1) shall not apply to stencil coats, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating. The limitations in 35 Ill. Adm. Code 219.219, however, shall apply to these coatings unless specifically excluded in 35 Ill. Adm. Code 219.219.

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
i.	General one component coating		
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Baked	0.28 (2.3)	0.40 (3.35)
ii.	General multi-component coating		
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Baked	0.28 (2.3)	0.40 (3.35)
iii.	Extreme performance coating		
	A. Air dried	0.42 (3.5)	0.80 (6.67)
	B. Baked	0.36 (3.0)	0.61 (5.06)
iv.	Repair coats and touch-up coatings		
	A. Air dried	0.42 (3.5)	
	B. Baked	0.36 (3.01)	

- b. Pursuant to 35 Ill. Adm. Code 219.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 219.302, 219.303, 219.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 219 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.

- 4a. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs.

- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH, because the source is not involved in the spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

- 5a. Pursuant to 35 Ill. Adm. Code 219.187(a)(2)(B)(x), notwithstanding 35 Ill. Adm. Code 219.187(a)(1): Cleaning operations for emission units within the miscellaneous metal parts coating category shall be exempt from the requirements of 35 Ill. Adm. Code 219.187(b), (c), (d), (e), (f), and (g).

- b. Pursuant to 35 Ill. Adm. Code 219.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 is required to meet the limitations of 35 Ill. Adm. Code 219 Subpart G (35 Ill. Adm. Code 219.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 219.204.

- c. Pursuant to 35 Ill. Adm. Code 219.219(c)(2), notwithstanding 35 Ill. Adm. Code 219.219(b), the application method limitations in 35 Ill. Adm. Code 219.219(b)(6) shall not apply to the following: For metal parts and products coating operations: touch-up coatings, repair coatings, textured finishes, stencil coatings, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating

- 6a. Pursuant to 35 Ill. Adm. Code 219.210(i), no owner or operator of a coating line subject to the emission limitations in 35 Ill. Adm. Code 219.204(a)(2) or (q), or subject to the limitations in 35 Ill. Adm. Code 219.219, shall operate the coating line on or after a date consistent with 35 Ill. Adm. Code 219.106(e), unless the owner or

operator has complied with, and continues to comply with, 35 Ill. Adm. Code 219.204(a)(2) or (q), if applicable, or the alternative control options in 35 Ill. Adm. Code 219.205 or 219.207, and all applicable requirements in 35 Ill. Adm. Code 219.211 and 219.219.

b. Pursuant to 35 Ill. Adm. Code 219.219(b), except as provided in 35 Ill. Adm. Code 219.219(c), every owner or operator of a coating line described in 35 Ill. Adm. Code 219.204(q) shall:

- i. Store all VOM-containing coatings, thinners, coating-related waste materials, cleaning materials, and used shop towels in closed containers;
- ii. Ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials;
- iii. Minimize spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials;
- iv. Convey VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes;
- v. Minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers; and
- vi. Apply all coatings using one or more of the following application methods:
 - A. Electrostatic spray;
 - B. High volume low pressure (HVLP) spray;
 - C. Flow coating. For the purposes of 35 Ill. Adm. Code 219.219(b)(6)(C), flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
 - D. Roll coating;
 - E. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 219.219(b)(6)(E), electrodeposition means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
 - F. Airless spray;

- G. Air-assisted airless spray; or
- H. Another coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.

- 7a. 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.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the filters associated with the paint booths such that the filters are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- c. This permit is issued based on the coatings used at this source not containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- 8a. VOM emissions from and operation of the two coating lines shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
7.5	60.0	7.5	<u>60.0</u>

These limits are based on the maximum production rate. The VOM emissions shall be calculated using the following equation:

$$E = [\sum P_i \times D_i \times C_i] / 2,000$$

Where:

- E = VOM or HAP emissions (tons);
- P_i = coating and solvent usage (gal);
- D_i = Density of Coatings and Solvents (lb/gal); and
- C_i = VOM or HAP content of coatings and solvents used (lb/gal);

- b. This permit is issued based on negligible emission of particulate matter from the two coating lines. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.79

tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. 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 and the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm.

- d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 9a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 10 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 10a. Pursuant to 35 Ill. Adm. Code 219.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 219.105 to establish the records required under 35 Ill. Adm. Code 219.211.

11. 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.

- 12a. Pursuant to 35 Ill. Adm. Code 219.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 219.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating as applied on each coating line;
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 219.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line, and certified product data sheets for each coating.

- b. Pursuant to 35 Ill. Adm. Code 219.211(h)(3), on and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 219.219 shall maintain at the source all records required by 35 Ill. Adm. Code 219.211(h) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- 13a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Records addressing use of good operating practices for the paint booth filters:
 - A. Records for periodic inspection of the paint booth filters with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Usage of each coating (gallon/month, gallon/year);
 - iii. Density of each coating used (lb/gallon);
 - iv. VOM and HAP content of each coating used (weight percent);
 - v. Usage of each solvent (gallon/month, gallon/year);
 - vi. Density of each solvent used (lb/gallon);
 - vii. VOM and HAP content of each solvent used (weight percent); and
 - viii. Monthly and annual VOM and HAP emissions from the source (tons/month, tons/year) with supporting calculations.
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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 storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
- 14a. Pursuant to 35 Ill. Adm. Code 219.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 219.204 of other than 35 Ill. Adm. Code 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 219.204 shall comply with the following: On and after a date

consistent with 35 Ill. Adm. Code 219.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:

- i. Any record showing violation of 35 Ill. Adm. Code 219.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 219.204 to 35 Ill. Adm. Code 219.205 or 35 Ill. Adm. Code 219.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 219.211(d) or (e), as applicable.
- b. Pursuant to 35 Ill. Adm. Code 219.211(h)(3), on and after a date consistent with 35 Ill. Adm. Code 219.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 219.219 shall comply with the following: Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 219.219 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
- 15a. If there is an exceedance of or a 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 or 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.
- b. 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
2009 Mall Street
Collinsville, Illinois 62234

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If you have any questions on this, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

REP:VJB:jws

cc: Illinois EPA, FOS Region 3
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the facility 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 the plant. The resulting maximum emissions are below the threshold levels (e.g., 100 tons/yr for VOM, 10 tons/year of any single HAP and 25 tons/year of a combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program (CAAPP). Actual emissions from this source will be less than predicted in this summary to the extent that VOM emissions are less than that required in this permit.

<u>Emission Units</u>	E M I S S I O N S (Tons/Year)			
	<u>PM</u>	<u>VOM</u>	<u>Single HAP</u>	<u>Combined HAPs</u>
Two Paint Booths	0.88	60.0	7.9	19.9