

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY FOR THE
DRAFT TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT FOR

Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, Illinois 60623

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March 14, 2005
Springfield, Illinois

I. INTRODUCTION

This source has applied for a renewal of the Title V - Clean Air Act Permit Program (CAAPP) operating permit (I.D. 031600APY, Permit #95120079) for its existing operation. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by the federal Clean Air Act, as amended in 1990, and 40 CFR Part 70. Unlike state operating permits, the conditions in a CAAPP permit are enforceable by the Illinois Environmental Protection Agency (Illinois EPA), the USEPA and the public. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

The Title V permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

II. KEY ELEMENTS OF THE PROPOSED PERMIT

This Title V permit is divided into several sections and the following are the important segments that may be of interest to the general public:

- a. Source identification
- b. List of abbreviations and acronyms commonly used
- c. Insignificant activities
- d. Significant emission units operated at the source (Section 4)
- e. Overall source conditions (Section 5)
- f. Conditions for emissions trading programs (Section 6)
- g. Conditions for specific significant emission units (Section 7)
- h. General permit conditions (Section 8)
- i. Standard permit conditions (Section 9)
- j. Attachments (Section 10)

III. SOURCE DESCRIPTION INFORMATION

- a. Location and nature of business

Meyer Steel Drum, Inc. is located at 3201 South Millard Avenue in Chicago and reconditions and recycles industrial shipping containers. Coatings are used to provide a durable, protective finish that resist weathering, abrasion, impacts, and in the case of interior linings, provide chemical resistance to the contents of the container. Drums are cleaned to remove residue either in drum furnaces or by caustic wash. The method chosen depends on the residue material and type of drum. Drums are then shot blasted to complete the cleaning process and finally coated.

b. National Ambient Air Quality Standard status for this area

This source is located in an area that is non-attainment for ozone and attainment for other pollutants of the National Ambient Air Quality Standards.

c. Major source status

The proposed permit is based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

d. Significant emission units

Emission Unit	Description	Date of Construction	Emission Control Equipment
Unit 01 Coating Lines	<u>Coating Line #1</u> (Interior Coating Line with Spray Booth SPB-1 and Steam Flash Oven FO-1) <u>Coating Line #2</u> (Primer Coating Line with Coating Booth SPB-2 and Curing Oven CO-1) <u>Coating Line #3</u> (Exterior Coating Line with Coating Booth SPB-3 and Curing Oven CO-2) <u>Coating Line #4</u> (Interior Coating Line with Spray Booth SPB-4 and Steam Flash Oven CO-1) <u>Coating Line #5</u> (Exterior Coating Line with Coating Booth SPB-5 and Curing Oven CO-2) <u>Coating Line #6</u> (Exterior Coating Line with Coating Booth SPB-6 and Curing Oven CO-3) <u>Coating Line #7</u> (Ring Dip Coating Line with Dip Coater DC-1 and Curing Oven CO-2)	April-August 1991 (All Lines)	Filter (AF-1) Filter (AF-2) Filter (AF-3) Water Wall (WW-1) Water Wall (WW-2) Filter (AF-4) None
Unit 02 Drum Reclamation Furnace	Natural Gas-Fired Drum Cleaning Reclamation Furnace DRF-1	1991 (Modified - 2003, PTE Construction)	Permanent Total Enclosure and Afterburner
Unit 03 Shot Blasters	Shot Blasters 1-4 (SB-1 Through SB-4) for Removing Scales	1991 (#1-#3) 1993 (#4)	Fabric Filter for Each Shot Blaster
Unit 04 Natural Gas-Fired Boiler	Maximum Heat Input Capacity: 12 mmBtu/hr	1991	None
Unit 05 Plastic Drum Shredder	Shredding Plastic Drums	1996	Cyclone Separator Followed by a Baghouse

IV. EMISSIONS INFORMATION

The proposed permit limits the source wide maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source-wide limit. Further unit specific emission unit limitations are found within Sections 5 and 7 of the proposed permit.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	123.86
Sulfur Dioxide (SO ₂)	0.03
Particulate Matter (PM)	22.41
Nitrogen Oxides (NO _x)	9.87
Hazardous Air pollutant (HAP), not included in VOM or PM	----
TOTAL	156.17

This proposed permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the proposed permit by T1, T1R, or T1N. Any conditions established in a construction permit [T1] pursuant to Title I and not revised or deleted in this proposed permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new [T1N] or revise [T1R] such conditions in a Title I permit, those conditions are consistent with the information provided in the Title V application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

V. EMISSIONS TRADING PROGRAMS INFORMATION

a. Emissions Reduction Market System (ERMS)

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the proposed permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the proposed permit. The proposed permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions.

b. As of the date of issuance of this permit, there are no Nitrogen

Oxides (NO_x) Trading and Acid Rain trading programs applicable to this source

Existing Programs	Basis for non-applicability
Nitrogen Oxides (NO _x) Trading Program	Source does not have an affected units with a design capacity greater than 250 mmBtu/hr and as defined in 217.454(a)
Acid Rain Program	Not an Electric Generating Unit

VI. MONITORING and COMPLIANCE ASSURANCE MONITORING (CAM) PLAN INFORMATION

- a. The following emission units (or group of emission units) at the source utilize instrumental or non-instrumental monitoring procedures for verifying compliance with existing emission standards and/or limitations:

Emission Unit (Group of emission units)	Instrumental Monitoring Procedures (values and parameters measured)	Non-instrumental Monitoring Procedures (testing, recordkeeping, inspections, operational practices, etc.)	CAM Applicability Yes/No (based on the information provided in the CAAPP)
Unit 01 Coating Lines	None	Testing and recordkeeping of the VOM content in applied coatings	No
Unit 02 Drum Reclamation Furnace	Monitoring afterburner secondary combustion chamber temperature (at least 1600 ⁰ F)	Testing of PM ₁₀ emissions; records of the afterburner secondary combustion chamber temperature	Yes
Unit 03 Shot Blasters	None	Periodic inspection and routine maintenance of fabric filters	No
Unit 04 Natural Gas-Fired Boiler	None	None	No
Unit 05 Plastic Drum Shredder	None	Periodic inspection and routine maintenance of air pollution control devices	No

- b. Compliance Assurance Monitoring (CAM) Plan

The Compliance Assurance Monitoring (CAM) plan is a program for

pollutant-specific emission units which use an add-on control device to achieve compliance with an emission limitation or standard, has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than major source threshold levels, and is not specifically exempt by 40 CFR Part 64. Subject units and the CAM plans are identified in Attachment 3 of the proposed permit.

VII. OTHER PERTINENT INFORMATION

Episode Action Plan (EAP)

An episode action plan (EAP) is a program for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Permittee is required to immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared. The Permittee is required to maintain and have this plan on file with the Illinois EPA.

VIII. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source.

IX. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a Title V permit. The Illinois EPA is therefore proposing to issue a Title V permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the proposed permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.