

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Great Dane Limited Partnership / Great Dane Trailers
Attn: Sam Gupta, Vice President, Manufacturing
2555 South Blue Island
Chicago, Illinois 60608

Application No.: 02030082

I.D. No.: 073813AAG

Applicant's Designation:

Date Received: March 15, 2002

Subject: Semi Truck Trailer Coating

Date Issued: DRAFT

Expiration Date:

Location: 2006 Kentville Road, Kewanee, Illinois 61443

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of equipment itemized in Five Spray Booths, natural gas fuel combustion, and a diesel storage tank 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 of volatile organic material, 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of 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.
 - ii. 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 consequence 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, being established prior to the Compliance Date for existing sources listed in 40 CFR 63.3883(b).
- 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 IAC 215.204(j)(2) and (3), no owner or operator of a Miscellaneous Metal Parts and Products coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds

which are specifically exempted from the definition of volatile organic material pursuant to 35 Ill. Adm. Code Part 215, delivered to the coating applicator:

i. Air dried coating:

Kg/liter	Lbs/gallons
0.42	3.5

ii. Extreme Performance Coating:

Kg/liter	Lbs/gallons
0.42	3.5

- b. Pursuant to 35 Ill. Adm. Code 215.206(b), the limitations of 35 Ill. Adm. Code 218 Subpart F shall not apply to touch-up and repair coatings used by a coating source described in 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j); provided that the source-wide volume of such coatings does not exceed 0.95 liter (1 quart) per eight-hour period or exceed 209 liter/year (55 gallons/year) for any rolling twelve-month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with 35 Ill. Adm. Code 215.206(c).
- c. Pursuant to 35 Ill. Adm. Code 215.206(d), "touch-up and repair coatings" means, for purposes of 35 Ill. Adm. Code 215.206, any coating used to cover minor scratches and nicks that occur during manufacturing and assembly processes.
- d. Pursuant to 35 Ill. Adm. Code 215.209, no coating line subject to the limitations of 35 Ill. Adm. Code 215.204 is required to meet 35 Ill. Adm. Code 215.301 or 215.302 after the date by which the coating line is required to meet 35 Ill. Adm. Code 215.204.
- 3a. 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 the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.321(a), 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 subsection (c) of 35 Ill. Adm. Code 212.321.
- 4a. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this permit.

- b. An adequate inventory of spare filters shall be maintained.
- 5a. Emissions and operation of the five spray booths including clean up shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Coating usage and Clean Up	7.1	85.2	7.1	85.2

These limits are based on the maximum material usage and the maximum VOM content of the coatings and clean up solvents.

- b. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

<u>Fuel Usage</u>		<u>Pollutant</u>	<u>Emission Factor</u>	<u>Emissions</u>	
<u>(mmscf/Month)</u>	<u>(mmscf/Year)</u>		<u>(Lbs/mmscf)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
2.83	34.0	NO _x	100	0.14	1.7
		CO	84	0.12	1.4
		PM	7.6	0.01	0.1
		VOM	5.5	0.01	0.1
		SO ₂	0.6	0.01	0.1

These limits are based on maximum fuel usage and standard emission factors.

- c. Natural gas shall be the only fuel fired in the fuel combustion equipment. Use of any other fuel requires a permit revision.
- d. This permit is issued based on negligible emissions of particulate matter from each of the five spray booths controlled by filters. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year per booth.
- e. This permit is issued based on negligible emissions of volatile organic matter from the above ground diesel storage tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
- f. 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.

- g. 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).

- 6a. 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.

- b. Pursuant to 35 Ill. Adm. Code 215.206(c), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall:
 - i. Collect and record the name, identification number, and volume of each touch-up and repair coating, as applied on each coating line, per eight-hour period and per month;

 - ii. Perform calculations on a daily basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for each eight-hour period;

 - iii. Perform calculations on a monthly basis, and maintain at the source, records of such calculations of the combined volume of

touch-up and repair coatings used source-wide for the month and the rolling twelve-month period;

- iv. Prepare and maintain at the source an annual summary of the information required to be compiled pursuant to 35 Ill. Adm. Code 215.206(b) on or before January 31 of the following year; and
 - v. Maintain at the source for a minimum of three years all records required to be kept under this subsection (c) and make such records available to the Illinois EPA upon request.
- c. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. The operating schedule of the affected coating line;
 - ii. Results of filter inspections and dates of replacements;
 - iii. The name and identification number of each coating as applied on the affected coating line;
 - iv. The usage of each coating, in units of gallons/month;
 - v. 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 month on the affected coating line, in lbs/gallons;
 - vi. The amount of each clean up solvent used (gallons or tons/month and gallons or gallons or tons/year);
 - vii. The weight of VOM per volume of clean up solvent (minus water and any compounds which are specifically exempted from the definition of VOM) as used each month (weight % or lbs/gallon);
 - viii. The quantity of each HAP containing material used (gallon or ton/month and gallon or ton/year);
 - ix. The individual and combined HAP content of each HAP containing material as used each month (weight % or lbs/gallon);
 - x. Natural gas fuel usage (mmscf/month and mmscf/year); and
 - xi. Monthly and Annual emissions of CO, NO_x, PM, SO₂, VOM and individual and combined HAP from the source with supporting calculations (tons/month and tons/year).
7. 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) 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.

- 8a. Pursuant to 35 Ill. Adm. Code 215.206(c), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall Notify the Illinois EPA in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 liter (1 quart) per eight-hour period or exceeds 209 liter/year (55 gallons/year) for any rolling twelve-month period within 30 days after any such exceedance. Such notification shall include a copy of any records of such exceedance.
- b. 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. 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.
9. 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 Ernie Kierbach at 217/782-2113.

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

ECB:ELK:cjc

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating 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 such a plant. The resulting maximum emissions are well below the levels (e.g., 100 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 less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)					Single	Total
	<u>CO</u>	<u>NOx</u>	<u>PM</u>	<u>SO2</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Five Spray Booths			2.2		85.2		
Fuel combustion	1.4	1.7	0.1	0.1	0.1		
Storage Tank					0.44		
	<u>1.4</u>	<u>1.7</u>	<u>2.3</u>	<u>0.1</u>	<u>85.74</u>	< 10	< 25

ELK:cjc