

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Swenson Spreader LLC
Attn: Jim Carter
127 Walnut Street
Lindenwood, Illinois 61049

<u>Application No.:</u> 96030190	<u>I.D. No.:</u> 141811AAE
<u>Applicant's Designation:</u>	<u>Date Received:</u> April 5, 2006
<u>Subject:</u> Spreader Manufacturing Equipment	
<u>Date Issued:</u> December 22, 2006	<u>Expiration Date:</u> December 22, 2011
<u>Location:</u> 127 Walnut Street, Lindenwood	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of wet coating operations with water wash down curtain draft scrubber, powder coating operation, surface cleaning operations, natural gas fired air make-up heater, 1.56 million Btu/hour natural gas fired boiler, and natural gas fired heaters, 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 potential 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 a single hazardous air pollutant (HAP) and 25 tons/year for totaled 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. 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 M. 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 permits issued for this location.

- 2a. 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.
- 3a. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.
- b. Pursuant to 35 Ill. Adm. Code 215.206(a), the limitations of 35 Ill. Adm. Code Part 218 Subpart F shall not apply to coating plants in which emissions of volatile organic material as limited by the operating permit will not exceed 22.7 Mg/year (25 tons/year), in the absence of air pollution control equipment.
- 4a. Emissions and operation of the wet coating operation at the source shall not exceed the following limits:

i. Material Usage:

<u>Material</u>	<u>Material Usage</u>	
	<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>
Solvents	125	1,000
Wet Coatings	700	5,500

ii. Material Properties:

<u>Material</u>	<u>Solids Content</u>	<u>VOM Content</u>	<u>Single Hap Content</u>	<u>Combined HAP Content</u>
	<u>(% by Wt)</u>	<u>(Lbs/Gal)</u>	<u>(% by Wt)</u>	<u>(% by Wt)</u>
Solvents	--	6.84	45	70
Wet Coatings	74.3	6.00	37	45

iii. Emissions of PM, VOM, and HAP:

<u>Material</u>	<u>PM</u>		<u>VOM</u>		<u>Single HAP</u>		<u>Combined HAPs</u>	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Solvents	----	----	0.43	3.42	0.20	1.54 ¹	0.30	2.39
Wet Coatings	0.09	0.71	2.06	<u>16.50</u>	4.81	9.61 ^{1, 2}	1.87	<u>14.94</u>
			<u>Totals</u>	<u>19.92</u>				<u>17.33</u>

¹	Toluene Total:	6.09 tons/year
²	Glycol Ether Total:	9.61 tons/year

These limits are based on maximum solvent and coating usage, the maximum material properties (solids, VOM, and HAP content) of each material, a transfer efficiency of 70%, and a capture efficiency of 95% for the water wash down curtain draft scrubber, and material balance.

- b. i. Emissions of particulate matter from the powder coating system shall not exceed 0.55 lb/hour and 2.4 tons/year. These limits are based on a process weight rate of 100 lbs/hour and the allowable emission rate from 35 Ill. Adm. Code 212.321.
- ii. The above limitations were established in Permit 98050031, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21
- c. Emissions and operation of the natural gas combustion equipment shall not exceed the following limits:
 - i. Natural Gas Usage: 10 mmscf/month and 80 mmscf/year
 - ii. Emissions from combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor (Lbs/mmscf)</u>	<u>Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84	0.42	3.36
Nitrogen Oxides (NO _x)	100	0.50	4.00
Particulate Matter (PM)	7.6	0.04	0.31
Sulfur Dioxide (SO ₂)	0.6	0.01	0.03
Volatile Organic Material (VOM)	5.5	0.03	0.22

These limits are based on the maximum equipment operations and standard emission factors (Table 1.4-1 and 1.4-2 of AP-42, Volume I, Fifth Edition, Supplement D, July 1998).

- d. 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.
- e. Compliance with annual limits 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).

5. 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. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. The VOM content of each individual coating and solvent (lb VOM/gallon);
 - ii. The usage of each individual coating and solvent (gallons/month and gallons/year);
 - iii. The amount of cleaning solvent reclaimed;
 - iv. Natural gas usage (mmscf/month and mmscf/year); and
 - v. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM and HAPS with supporting calculations (tons/month and tons/year).
6. 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.

7. 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.

8. 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

It should be noted that the welding operations with filters and electrostatic precipitator, enclosed blasting operations, machining operations, and assembly operations are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(y), (aa), and (jj).

If you have any questions on this, please call David Hulskotter at 217/782-2113.

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

ECB:DWH:psj

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the source 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 HAPs) 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)						
	<u>VOM</u>	<u>NO_x</u>	<u>CO</u>	<u>PM</u>	<u>SO₂</u>	Single <u>HAP</u>	Total <u>HAPs</u>
Coating Operations	19.92			1.50		9.61	17.33
<u>Combustion Equipment</u>	<u>0.22</u>	<u>4.0</u>	<u>3.36</u>	<u>0.31</u>	<u>0.03</u>	<u>----</u>	<u>----</u>
Plant-Wide Totals	20.14	4.0	3.36	3.57	0.03	< 10	< 25

DWH:psj