

217/782-2113

"REVISED"
CONSTRUCTION PERMIT -- NSPS SOURCE

PERMITTEE

Rollex Corporation
Attn: John Imboden
2001 Lunt Avenue
Elk Grove Village, Illinois 60007

Application No.: 99060032

I.D. No.: 031440ALU

Applicant's Designation: COIL COATER

Date Received: September 18, 2000

Subject: Coater

Date Issued: November 28, 2000

Location: 800 Chase Avenue, Elk Grove Village

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a coil coating line with thermal oxidizer and rollformers as described in the above referenced application. This Permit is subject to standard conditions attached hereto and the following special conditions:

1. These conditions effectively limit the potential emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons per year of VOM). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.
- 2a. This coil coating line with thermal oxidizer is subject to a New Source Performance Standard (NSPS) for Metal Coil Surface Coating, 40 CFR 60, Subparts A and TT. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. Pursuant to 40 CFR 60.462(a)(3), 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency.
- c. At all times, the Permittee shall also, to the extent practicable, maintain and operate the coil coating line with thermal oxidizer, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
3. The Permittee shall fulfill applicable notification and recordkeeping requirements of the NSPS, 40 CFR 60.7, and 40 CFR 60.465.
- 4a. The thermal oxidizer shall be in operation at all times when the associated emission unit(s) is in operation and emitting air contaminants.

- b. The thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400EF in the absence of a compliance test. This temperature shall be maintained during operation.
 - c. The thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the thermal oxidizer is in use. This device shall monitor the thermal oxidizer combustion chamber temperature.
 - d. The thermal oxidizer shall be designed and operated such that it results in a 99% overall emission reduction for the coil coating line.
 - e. Pursuant to 40 CFR 60.464(c), if thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with 40 CFR 60.462(a)(2), (3), or (4). This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, which is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with 40 CFR 60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.
5. Emissions and operation of the Coil Coating Line with thermal oxidizer shall not exceed the following limits:

Coating	VOM Usage		Minimum Overall Control Efficiency	VOM Emissions	
	(Lb/Hr)	(Ton/Yr)	(%)	(Lb/Hr)	(Ton/Yr)
Primer	73	237.3	99	0.73	2.37
Finish	158	513.5	99	1.58	5.14
CBS	84	54.6	99	0.84	0.55
Backer	17	44.2	99	0.17	0.44
Chemical Treatment	0.23	0.7	0	0.23	0.70
Water Quench*			0	0.4	<u>1.30</u>
					10.50

* Determined through emission testing

<u>Coating</u>	<u>VOM Usage</u>		<u>Minimum Overall Control Efficiency</u>	<u>VOM Emissions</u>	
	<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>	<u>(%)</u>	<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>
Diluent	675	1,350	99	6.75	0.02
Clean-Up Solvent	1,688	3,375	99	16.88	0.02

These limits are based on VOM usage = VOM content * usage, complete volatilization on the VOM content and the information provided in the application. Compliance with annual limits shall be determined from a running total of 12 months of data.

6. The operations and emissions of the rollforming lines shall not exceed the following limits:

<u>Lubricant Usage</u>		<u>Lubricant VOM Content</u>	<u>VOM Emissions</u>
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Lbs VOM/Gal)</u>	<u>(Tons/Year)</u>
500	5,821	4.95	14.4

These limits are based on the maximum usage of rollforming lubricant indicated in the permit application. Compliance with the annual limits shall be determined from a running total of 12 months of data.

7. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
8. The coil coating line with thermal oxidizer may be operated for a period of 180 days after completion of construction, under this construction permit.
- a. Within 60 days after achieving the maximum production rate at which the coil coating line with thermal oxidizer will be operated, but not later than 180 days after completion of its construction, the VOM and concentration in its effluent stream shall be measured by an approved testing service.
 - b. Performance tests shall be conducted and data collected in accordance with the test methods and procedures specified in 40 CFR 60.466 and 35 Ill. Adm. Code 183.
 - c. At least thirty (30) days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review and approval. This plan shall describe the specific procedures for testing including as a minimum:

- i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
- ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, the levels of operating parameters at or within which compliance is intended to be shown, if applicable, and the means by which the operating parameters for the process and any control equipment will be determined.
- iii. The specific determination of emissions and operations which are intended to be made, including sampling and monitoring locations.
- iv. The test method(s) which will be used, with the specific analysis method.
- v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
- vi. Any proposed use of an alternative test method, with detailed justification.
- vii. The format and content of the Source Test Report prior to carrying out these tests, the Illinois EPA shall be notified a minimum of thirty (30) days prior to the scheduled date of these tests with the exact date, time, and place of these tests, to enable the Illinois EPA to witness these tests.

If the scheduled date for the test is changed for unforeseen reasons, the Permittee shall inform the Illinois EPA within five (5) working days of the scheduled test date and must specify the date of the rescheduled test.

A copy of the Final Report(s) for these tests and compliance status shall be submitted to the Illinois EPA within fourteen (14) days after the test results are compiled and finalized, prior to or accompanying the operating permit application. Satisfactory completion of these tests and compliance with the limitations of this permit shall be prerequisite to the issuance of an operating permit.

- viii. A statement that the testing will be performed by a qualified independent testing service.

9. The Permittee shall maintain monthly and annual records of the following:

- a. Name, usage (lb/month and tons/year), VOC and HAP content (lb/gallon or wt%), and VOC and HAP emissions (lb/month and lb/year) of the following:
 - i. Coatings;
 - ii. Dilutents;
 - iii. Lubricants;
 - iv. Chemical treatments;
 - v. Clean-up solvents; and
 - vi. All other solvent containing material.
 - b. Hours of operation of the coil coating line.
10. The Permittee shall keep records each day of the following items for the thermal oxidizer:
- a. The thermal oxidizer combustion chamber monitoring data.
 - b. A log of operating time for the capture system, thermal oxidizer, monitoring device, and the associated emission unit(s).
 - c. A maintenance log for the capture system, thermal oxidizer, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA 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 request for records during the course of a source inspection.
12. If there is an exceedance of 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 violation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

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
9511 West Harrison
Des Plaines, Illinois 60016

14. Upon issuance, this permit supersedes Construction Permit 98120082, issued date April 27, 1999, which addressed construction and operation of 31 rollforming lines.

It should be noted that this permit addresses a revised scope for this new aluminum siding plant, which now includes a coil coater and ten additional rollformers (41 total). Because the Permittee has lowered the consumption and the VOM content of the lubricant used on the Rollformers, the plant will still be limited to 24.9 tons per year as originally provided in permit 98120082.

Please note that this permit has been revised to reflect the additional emission point (water quench). There is no change in overall emissions.

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

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:EEJ:psj

cc: Illinois EPA, FOS, Region 1
Illinois EPA, Compliance Unit
USEPA