



matter from washer system, burnoff oven, and spray booth filters. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

4. Appropriate operating records shall be maintained to allow the Illinois EPA to review compliance with the limits in Condition 1 and 2.

- 5a. Only Type O waste and paint filters shall be burned in the incinerator and at a rate not to exceed 500 lb/hr.
- b. The afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400EF, before any waste is loaded into the incinerator, and this temperature shall be maintained during incineration.
- c. The incinerator shall be equipped with a temperature indicator for afterburner combustion chamber temperature.

It should be noted that during the analysis of this permit application, it was determined that your facility has the potential to emit more than 100 tpy of VOM and will be classified as a major source under the Clean Air Act Permit Program (CAAPP). To avoid the CAAPP permitting requirements, you may want to consider applying for a Federally Enforceable State Operating Permit (FESOP), or alternatively, register as a "Non-Major Source Based Upon Actual Emission Levels" if your actual emission of VOM is less than 50% major threshold levels. A FESOP is an operating permit which contains Federally enforceable limits in the form of permit conditions which effectively restrict the potential emissions of a source to below major source thresholds, thereby excluding the source from the CAAPP. Please contact the Permit Section at 217/782-2113 to request the necessary application forms.

This permit has been revised to add a paint burnoff oven and remove an exempt welder.

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

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

DES:MAM:psj

cc: Region 3

217/782-2113

"REVISED"  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
NSPS SOURCES

PERMITTEE

Paris Metal Products, L.L.C.  
Attn: Jim Handlin  
West Highway 133 & Grandview  
Paris, Illinois 61944

Application No.: 93110016                      I.D. No.: 045030ABX  
Applicant's Designation:                      Date Received: April 27, 1998  
Subject: Coating Operations  
Date Issued: October 26, 1998                      Expiration Date: October 26, 2003  
Location: West Highway 133 & Grandview, Paris

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a phosphate washer line with dryer, five (5) paint spray booths, a paint burn-off oven, and three (3) washer 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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for VOM, 10 tons/year for any single HAP and 25 tons/year of totaled HAPs), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- 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) issued for this location.
- 2a. The metal furniture coating operations are subject to 40 CFR 60 Subparts A and EE - New Source Performance Standards (NSPS) for Surface Coating of Metal Furniture. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement.
- b. At all times the Permittee shall also maintain and operate the metal furniture coating operations in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the NSPS, 40 CFR 60.11(d).

- c. The VOC emissions from the metal furniture coating operations shall not be in excess of 0.90 kilogram of VOC per liter of coating solids applied.[40 CFR 60.312(a)]
- 3. The coating operations are subject to 35 Ill. Adm. Code 215.204(j)(5) and 215.204(g). Emissions and operation of the coating booths shall not exceed the following limits:

<u>Material</u>	VOM	VOM Usage		VOM Emissions	
	<u>Content</u> <u>(Lb/Gal)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Coating	3.0	6.13	73.5	6.13	73.5

These limits define the potential emissions of VOM from the coating lines and are based on VOM content, maximum usage and material balance. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 4. The Permittee shall calculate the volume-weighted average emissions of VOC's in kilograms per liter of coating solids applied (G) each calendar month for each affected facility.[40 CFR 60.313(b)]
- 5. The following procedures shall be used to calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied (G):
  - a. Calculate the mass of VOC's used (Mo + Md) during each calendar month for each affected facility by the following equation:

$$M_o = M_d + \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

Where:

- M<sub>d</sub> = the mass of diluent VOC-solvent consumed (kilograms)
- M<sub>o</sub> = the mass of VOC's in coatings consumed, as received (kilograms)
- L<sub>c</sub> = the volume of each coating consumed, as received (liters)
- L<sub>d</sub> = the volume of each diluent VOC-solvent added to coatings (liters)
- D<sub>c</sub> = density of each coating, as received (kilograms per liter)

$D_d$  = density of each diluent VOC-solvent (kilograms per liter)

$W_o$  = the proportion of VOC's in each coating (or input stream), as received (fraction by weight)

$n$  = the number of different coatings used during the calendar month

$m$  = the number of different diluent VOC-solvents used during the calendar month

- b. Calculate the total volume of coating solids used ( $L_s$ ) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si}$$

Where:

$L_c$  = the volume of each coating consumed, as received (liters)

$V_s$  = the proportion of solids in each coating (or input stream), as received (fraction by volume)

- c. Calculate the volume-weighted average mass of VOC's consumed per unit volume of coating solids applied ( $G$ ) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o \% M_d}{L_s T}$$

$T$  = the transfer efficiency (fraction) (for non-rotational electrostatic spray  $T = 0.70$ , manual electrostatic spray  $T = 0.60$ ) for other transfer efficiencies, refer to NSPS 40 CFR 60.313, Table 1.

- 6a. The Permittee shall maintain records of the following items for the coating operations:
- i. The name and identification number of each coating and cleanup solvent as applied.
  - ii. The weight of VOM and HAP content per volume of each coating and cleanup solvent as applied.

- iii. Coating usage (gal/month and gal/year).
- iv. VOM and HAP emissions (lb/month and tons/year).
- b. 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 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 a course of a source inspection.
- 7a. The Permittee shall identify, record, and submit a written report to the Illinois EPA's Compliance Section in Springfield, Illinois every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition 2(c). If no such instances have occurred during a particular quarter, a report stating this shall be submitted semiannually.[40 CFR 60.315(b)]
- b. 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 record keeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 8. The paint burn-off oven afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400EF, and this temperature shall be maintained during use.
- 9. Total natural gas consumption and emissions shall not exceed the following limits:

Natural Gas Usage					
<u>(mmscf/Mo) (mmscf/Yr)</u>					
		19.6	234.9		
Nitrogen Oxides Emissions		Carbon Monoxide Emissions		Particulate Matter Emissions	
<u>(Ton/Mo) (Ton/Yr)</u>		<u>(Ton/Mo) (Ton/Yr)</u>		<u>(Ton/Mo) (Ton/Yr)</u>	
0.98	11.74	0.21	2.47	0.12	1.40

These limits are based on maximum natural gas consumption and AP-42 emissions factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

10. This permit is issued based on negligible emissions of particulate matter from the washer system, and burn-off oven. For this purpose, emissions shall not exceed nominal rates of 0.1 lb/hr and 0.44 ton/yr.
- 11a. The Permittee shall submit the following additional information from the prior calendar year, along with the Annual Emission Report, due May 1st of each year:
  - i. Coating usage(gal/month and gal/year);
  - ii. VOM emissions and HAP emissions (lb/month and ton/year);
  - iii. Natural gas usage (mmscf/month and mmscf/year).
- b. If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.
12. Two (2) copies of required reports and notifications concerning equipment operation, performance testing, or monitoring shall be sent to the following address, unless otherwise indicated:

Illinois Environmental Protection Agency  
Bureau of Air  
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 - Regional Office  
2009 Mall Street  
Collinsville, Illinois 62234

It should be noted that the welding operations are exempt from permit requirements pursuant to 35 Ill. Adm. Code 201.146(y), the batch curing oven and the continuous curing oven are exempt from permit requirements pursuant to 35 Ill. Adm. Code 201.146(fff) and the boiler is exempt from permit requirements pursuant to 35 Ill. Adm. Code 201.146(d).

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

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

DES:RBS:psj

cc: Illinois EPA, FOS Region 3  
USEPA

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from a metal furniture coating plant 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 levels ,e.g., 100 tons per year of VOM, 10 tons/year of any single HAP and 25 tons/year of a combination of all HAP's, 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 material is handled, and control measures are more effective than required in this permit.

1. Emissions from coating operations:

<u>Material</u>	VOM	VOM Usage		VOM Emissions	
	<u>Content</u> <u>(Lb/Gal)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Coating	3.0	6.13	73.5	6.13	73.5

These limits define the potential emissions of VOM from the coating lines and are based on maximum VOM content, maximum usage and material balance.

2. Emissions from natural gas usage:

Natural Gas Usage					
<u>(mmscf/Mo) (mmscf/Yr)</u>					
		19.6	234.9		
Nitrogen Oxides		Carbon Monoxide		Particulate Matter	
Emissions		Emissions		Emissions	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
0.98	11.74	0.21	2.47	0.12	1.40

Emissions are based on maximum natural gas usage and AP-42 emissions factors.

3. This permit is issued based on negligible emissions of particulate matter from the washer system, and burn-off oven. For this purpose, emissions shall not exceed nominal rates of 0.1 lb/hr and 0.44 ton/yr.

217/782-2113

November 19, 1999

Paris Metal Products, L.L.C.  
Attn: Jim Handlin  
West Highway 133 and Grandview  
Paris, Illinois 61945

I.D. No.: 045030ABX

Dear Mr. Handlin:

Enclosed is a revised permit letter which reflects only a change of ownership. Please note that if you have changed or intend to change this operation it will be necessary to apply for revision of your air pollution permit(s).

If you have any questions or require any assistance concerning these matters, contact Karen Luparell at 217/782-2113.

Very truly yours,

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

DES:KJL:93110016:jar

Enclosure

cc: Region 3  
I.D. File  
Permit File