



217/782-5544
TDD: 217/782-9143

October 10, 2013

John Therriault
Assistant Clerk
Illinois Pollution Control Board
100 West Randolph St., Suite 11-500
Chicago, IL 60601

Re: Grant of Provisional Variance with Conditions for Emissions of Volatile Organic Material and Replacement of a Thermal Oxidizer at Curtis Metal Finishing Company, Machesney Park Facility, Permit No., 96080025, Source ID: 201017AAB

Dear Mr. Therriault:

Attached please find a copy of a provisional variance that the Illinois Environmental Protection Agency ("Illinois EPA") granted to Curtis Metal Finishing Company, Machesney Park Facility, Illinois. As you may know, the Illinois Environmental Protection Act requires the Illinois EPA to promptly file a copy of its provisional variance decisions with the Illinois Pollution Control Board. See, 415 ILCS 5/37(b). This letter and attachment fulfills the Illinois EPA's statutory obligation.

Yours Truly,

A handwritten signature in black ink, appearing to read "Charles E. Matoesian".

Charles E Matoesian
Assistant Counsel



1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

217/782-5544
217/782-9143 (TDD)

October 10, 2013

David M. Yanochko, Corporate Environmental Director
Curtis Metal Finishing Company
9917 North Alpine Road
Machesney Park, Illinois 61115

Re: Request for Provisional Variance – Temporary shutdown of Regenerative Thermal Oxidizer for replacement at Machesney Park, Illinois Facility, FESOP No. 96080025

On September 12, 2013, the Illinois Environmental Protection Agency (Illinois EPA) received from Curtis Metal Refinishing Company (Curtis) a request for a provisional variance that would allow production to continue during the replacement of an existing volatile organic matter (VOM) emission control device, a thermal oxidizer. Curtis is currently operating seven dip-spin coating lines, four of which are affected by this variance petition (Lines 70-73). These operate pursuant to Illinois EPA Federally Enforceable State Operating Permit (FESOP) No. 96080025. In addition, Curtis has filed a construction permit application (identified as Application No. 13070033) with the Illinois EPA for modifications to the allowed VOM usage and emissions from its seven dip-spin coating operations, including these lines.

Permit Conditions 4a. and b., which reference 35 Ill. Adm. Code 215.204(j) and 215.205(b), respectively, will be affected by the outage to replace the thermal oxidizer. Section 215.204(j) limits the VOM content of coatings as applied to miscellaneous metal parts to a maximum of 0.42 kilograms per liter (3.5 pounds per gallon). Section 215.205(b) provides that owners or operators of coating lines subject to the provisions of Section 215.204(j) may install and operate an afterburner system which provides at least an 81% reduction in overall VOM emissions from the coating line and the oxidation of at least 90% of the VOM which enters the afterburner. Many of the customer-specified coatings used by Curtis on the dip-spin coating lines exceed 3.5 pounds of VOM per gallon, as applied. As a result, Curtis has installed and is operating a regenerative thermal oxidizer (RTO) which complies with the provisions of Section 215.205(b), but this existing oxidizer is in need of replacement. The Illinois EPA accepted this provisional

variance request for review pursuant to the requirements of the Illinois Environmental Protection Act ("Act") and the applicable Illinois EPA regulations.

Permit Condition 8a. limits the VOM emissions from Lines 70-73 to 3.9 tons per four-week period and 38.6 tons per year. VOM emissions may exceed the current per period limit during the replacement of the existing thermal oxidizer. As part of the previously mentioned construction permit application, Curtis is requesting that the VOM limits for Lines 70-73 be combined with the VOM limits for the three other dip-spin coating lines (Lines 68, 69, and 74), which are currently limited to emissions of 25.1 tons of VOM per year pursuant to Construction Permit No. 12050035. The variance will not affect Lines 68, 69, and 74 because they are controlled by a separate thermal oxidizer.

The Illinois EPA evaluated the request pursuant to the requirements of Sections 35, 36, and 37 of the Act (415 ILCS 5/35, 5/36, 5/37) and the Illinois EPA regulations at 35 Ill. Adm. Code Part 180. The Illinois EPA is granting Curtis' request for a provisional variance as the source has demonstrated that an arbitrary and unreasonable hardship would result in the event of a denial. In addition, Curtis is located in an attainment area for ozone and the scheduled outage will occur after the period when ozone would be likely to develop in this area. Curtis believes that without the provisional variance, it is possible it will lose customers. This is due to the nature of its business wherein a quick turnaround of product is needed. Curtis states that it is generally the last step in the manufacturing process and that many of its customers operate on a "Just-In-Time" basis. Curtis is at times required to provide turnaround of work within hours of its receipt at the plant. Accordingly, Curtis states that it would be unable to properly service such customers who may then go elsewhere for future orders.

The Illinois EPA is granting Curtis relief from permit conditions 4a.,4b., and 8 of FESOP No. 96080025, which requires the use of an afterburner pursuant to subsection 215.205(b). Curtis is allowed a variance from the regulatory requirements identified in this petition for a maximum of four weeks (28 days) to allow continued production during the replacement of the existing thermal oxidizer VOM control system. This action affording relief is based, in principal part, upon Curtis' representation that no significant adverse environmental effect is expected as a result of the requested relief subject to the following terms and conditions:

- 1) Curtis shall notify the Illinois EPA in writing before shutting down the existing RTO at Curtis' Machesney Park Facility. Additionally, Curtis shall notify the Illinois EPA within seven days after the new RTO is installed and running to properly control VOM emissions. The report of the installation shall provide the dates and times of the installation. Curtis' contractor, Dürr Systems, Inc., has informed Curtis that the control equipment replacement will require a construction and commissioning schedule of 3-4 weeks. Curtis states that it will complete this control equipment replacement as quickly as possible.

According to Curtis, granting the provisional variance would result in a maximum of 5.2 tons of VOM emissions in excess of those otherwise allowed pursuant to Section

215.204(j). This estimate is based on the current coating application rate of the lines utilizing a coating with 3.5 pounds of VOM per gallon as applied. The total uncontrolled VOM emissions from Lines 70-73 could approach a maximum of 12.5 tons during the four-week RTO replacement period, 5.2 tons of which will be in excess of their permit limit.

2) The plant will comply with its annual emission limit, all other permit limits, and will continue to operate as a synthetic minor source of Hazardous Air Pollutants. In addition, the VOM control device replacement will occur in October, after high ozone would typically be seen in this area.

During the replacement period, Curtis must make every reasonable effort to shift high VOM content coating work to the lines controlled by the second RTO (Lines 68, 69 and 74).

3) During the term of the provisional variance, Curtis shall maintain and submit to the Illinois EPA records containing the following information: hours each line was in operation, coating usage per line, and VOM emissions from the coating lines.

4) Reports and information required under paragraph 3 shall be submitted within 30 days after the term of the provisional variance to:

Illinois Environmental Protection Agency
Bureau of Air, Compliance Unit
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

5) Following the receipt of this provisional variance, Curtis shall submit a certification to the Illinois EPA signifying its acceptance of the terms and conditions expressed herein. The certification shall be mailed to the Illinois EPA within 10 days of the date of receipt of this provisional variance letter and must be signed by the owner or operator, as follows:

Certification

I (We) _____, read the terms and conditions of the Illinois EPA's provisional variance, dated _____, and, I (we) hereby accept and agree to abide by the terms and conditions expressed therein.

The certification should be mailed, by certified mail, to the undersigned:

John J. Kim
Chief Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276.

Sincerely,

A handwritten signature in black ink, appearing to be 'John J. Kim', written over a horizontal line.

John J. Kim
Chief Legal Counsel
Illinois Environmental Protection Agency