

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Harbortown Division/IBR Corporation
Attn: Judith Brosnan-Vice President Operations
4800 West Roosevelt Road
Chicago, Illinois 60644

Application No.: 95120013 I.D. No.: 031600FLH
Applicant's Designation: HSHLDFURN Date Received: December 4, 1995
Operation of: Foam Filled Furniture Assembly and Distribution
Date Issued: October 25, 2000 Expiration Date²: October 25, 2005
Source Location: 4800 West Roosevelt Road, Chicago, Cook County
Responsible Official: Judith Brosnan, Vice President Operations

This permit is hereby granted to the above-designated Permittee to OPERATE household furniture assembly and distribution, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Tom Kolokythas at 217/782-2113.

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

DES:TK:jar

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

²

Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Harbortown Division
4800 West Roosevelt Road
Chicago, Illinois 60644
773/379-4000

I.D. No.: 031600FLH
Standard Industrial Classification: 2519, Household Furniture NEC

1.2 Owner/Parent Company

Harbortown Division, IBR Corporation
1550 Greenleaf Avenue
Elk Grove Village, Illinois 60007

1.3 Operator

Harbortown Division
4800 West Roosevelt Road
Chicago, Illinois 60644

Scott Haugh
773/379-4000

1.4 General Source Description

The Harbortown Division is located at 4800 West Roosevelt Road, Cook County. Harbortown Division foams filled household furniture assembly and distributes them. Raw materials are received, fabricated and/or assembled into finished furniture items, packaged, and shipped to a customer. Typical materials received are polyurethane foam, rolled vinyl or cloth fabric, polyester batting, polystyrene bead and cut wood. End products are bean bags, chair bags, futon frame with mattress, sofas, chairs, and ottomans.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
ACMA	Alternative Compliance Market Account
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
cfm	cubic feet per meter
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
gal	gallons
gr	grams
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilograms
kW	kilowatts
lb	pound
Mg	Megagrams
mmBtu	Million British thermal units
mo	month
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
scf	standard cubic feet
SO ₂	Sulfur Dioxide
T	ton
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being

	established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound
VOM	Volatile Organic Material
wt. %	Weight percent
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Plant Emission Unit	Date Constructed	Emission Control Equipment
Group 01 Wood Coating Operations	Wood Frames are Sprayed with Water Reducible Acrylic Coating	PV-1 (Mode 2)	November, 1991	Filter #1
Group 02 Gluing Operations	Glue Application with Hand-Held Air-Atomized	PV-1 (Mode 1) PV-2 PV-3	November, 1991 February, 1995 February, 1995	Filter #1 and Filter #2
Group 03 Woodworking Operations	Collection of Dust from Router, Saws, Sand Belt and Storage Room	PV-4 PV-5 PV-6	February, 1989 April, 1992 March, 1992	Filters #3, #4 and Dust Collectors #4, #5, #6

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

This permit is issued based on the source requiring a CAAPP permit as a major source of HAP emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied

on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

- c. 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 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.5 This stationary source, as defined in 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, is subject to 40 CFR Part 63. This stationary source shall comply and certify compliance with the applicable requirements of 40 CFR Part 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	3.46
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	0.93
Nitrogen Oxides (NO _x)	----
HAP, not included in VOM or PM	60.67
TOTAL	65.06

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is

based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Wood Furniture Coating Operations
Control 01: Filter #1

7.1.1 Description

Wood frames are placed on holding rails which positions them for coating in the glue process ventilated area. Coating operations are conducted by using a hand-held air atomized spray gun and a water reducible acrylic coating.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Wood Furniture Coating Operations - Mode 2	Filter #1

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected wood furniture coating line" for the purpose of these unit-specific conditions, are emission units used in the wood furniture coating line listed in 7.1.1 and 7.1.2.
- b. Each affected coating line at the source is subject to 35 IAC 212.321(a), which requires that:

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, 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 IAC 212.321 [35 IAC 212.321(a)] (See Attachment 1).

- c. Each affected wood furniture coating line is subject to 35 IAC 218.204(1)(1-4) which provides that:
 - i. On or after March 15, 1998, wood furniture sealers and topcoats must comply with one of the limitations specified below:

<u>Coatings</u>	<u>kg VOM/kg Solids</u>	<u>lb VOM/lb Solids</u>
Topcoat	0.8	0.8

Sealers and Topcoats with the following limits:

<u>Coatings</u>	<u>kg VOM/kg Solids</u>	<u>lb VOM/lb Solids</u>
A. Non-Acid-Cured Alkyd Amino Vinyl Sealer	1.9	1.9
B. Non-Acid-Cured Alkyd Amino Conversion Varnish	1.8	1.8
C. Acid-Cured Alkyd Amino Vinyl Sealer	2.3	2.3
D. Acid-Cured Alkyd Amino Conversion Varnish	2.0	2.0

- ii. On or after March 15, 1998, wood furniture coatings must comply with the limitations specified below:

<u>Coatings</u>	<u>kg/liter</u>	<u>lbs/gallon</u>
Opaque Stain	0.56	4.7
Non-Topcoat Pigmented Coat	0.60	5.0
Repair Coat Semi-Transparent	0.67	5.6
Stain	0.79	6.6
Wash Coat	0.73	6.1

- iii. On or after March 15, 1998, wood furniture coatings must comply with the limitations specified below:

- A. No source subject to the limitations of 35 IAC 218.204 (1) (1,2,or 3) and utilizing one or more wood furniture coating spray booths shall use strippable spray booth coatings containing more than 0.8 kg VOM/kg solids (0.8 lb VOM/lb solids), as applied.

B. Any source subject to the limitations of 35 IAC 218.204(1)(1,2,A or B) and utilizing one or more continuous coaters shall, for each continuous coater, use an initial coating which complies with the limitations of 35 IAC 218.204 (1)(1,2,A or B). The viscosity of the coating in each reservoir shall always be greater than or equal to the viscosity of the initial coating in the reservoir. The owner or operator shall:

1. Monitor viscosity of the coating in the reservoir with a viscosity meter or by testing the coating in the reservoir each time solvent is added.

[35 IAC 218.204]

- d. Pursuant to 40 CFR 63.802(1), using any of the compliance methods of 40 CFR 63.804(a), the Permittee shall comply with the following limitations:
 - i. A weighted average emission limitation of 1.0 lb VHAP/lb solids, as applied for all finishing operations.
 - ii. Maximum VOC content of 0.8 lb VOC/lb solids for all cleaning operations.
- e. Each affected wood furniture coating line is subject to the emission limits identified in Condition 5.2.2.

7.1.4 Non-Applicability of Regulations of Concern

An affected wood furniture coating line is not required to meet 35 IAC 218.301 and 218.302, Use of Organic Material, when subject to the limitations of 35 IAC 218.204 [35 IAC 218.209].

7.1.5 Operational Production and Work Practices

- a. Pursuant to 40 CFR 63.803, the Permittee shall comply with the work practice standards including:
 - i. Work practice implementation plan.
 - ii. Operator training course.

- iii. Inspection and maintenance plan.
 - iv. Cleaning and wash-off solvent accounting system.
 - v. Chemical composition of cleaning and wash-off solvents.
 - vi. Spray booth cleaning.
 - vii. Storage requirements.
 - viii. Application equipment requirements.
 - ix. Line cleaning.
 - x. Gun cleaning.
 - xi. Wash-off operations.
 - xii. Formulation assessment plan for finishing operations.
- b. The Permittee shall operate, maintain and replace the filters in a manner that assures compliance with the conditions of this section.
 - c. An adequate inventory of spare filters shall be maintained.

7.1.6 Emission Limitations

In addition to Condition 5.5.2 and the source wide emission limitations in Condition 5.5, the affected wood furniture coating line is subject to the following:

- a. Emissions from the affected wood furniture coating line shall not exceed 24.9 ton/yr;
- b. Compliance with the 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); and
- c. The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions

in this permit that limit the VOM emissions from the affected wood furniture coating line below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.1.7 Testing Requirements

- a. Performance tests shall be conducted in accordance with 40 CFR 63.805 to demonstrate initial and ongoing compliance as required by 40 CFR 63 Subpart JJ.
- b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5 of the Act, the VOM content of specific coatings and cleaning solvents used on each affected wood furniture coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208 and 218.211(a).
 - i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);
 - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent. [35 IAC 218.105(a), 218.208, and 218.211(a)]

7.1.8 Monitoring Requirements

- a. The owner or operator of an existing affected source subject to 40 CFR 63.802(a) (1) shall comply with the following monitoring requirements:
 - i. Calculate the average VHAP content for all finishing materials used to the source using Equation 1, and maintain a value of E no greater than 1.0;
 - ii. Use compliant finishing materials according to the following criteria:

- A. Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
 - B. Demonstrate that each wash coat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating thinner; and
 - C. Demonstrate that each wash coat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.
- b. The Permittee shall visually inspect the filters and check for airflow drop on a regular basis in order to ensure proper operation of the filters and the need for replacement.

7.1.9 Recordkeeping Requirements

- a. Pursuant to 40 CFR 63.806, the Permittee shall comply with the following recordkeeping requirements:
 - i. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits of 40 CFR 63.802 [40 CFR 63.806(b)(1)].
 - ii. VHAP content in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to 40 CFR 63.802 [40 CFR 63.806(b)(2)].
 - iii. The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable

booth coating subject to 40 CFR 63.802(a)(3) [40 CFR 63.806(b)(3)].

- iv. The owner or operator of an affected source following the compliance method in 40 CFR 63.804 (a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1 [40 CFR 806 (c)].
- v. Pursuant to 40 CFR 63.806(e), the Permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - A. Records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place.
 - B. Records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c).
 - C. Records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d).
 - D. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 CFR 63.803(h)(5).
 - E. Records associated with the formulation assessment plan required by 40 CFR 63.803(l).
 - F. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- vi. Records of compliance certifications for each semiannual period following the compliance date [40 CFR 63.806(h)].

- vii. Records of other information included with the compliance status report as required by 40 CFR 63.807(b) [40 CFR 63.806(i)].
- b. Pursuant to 35 IAC 218.211(c)(2), on and after a date consistent with 35 IAC 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
 - A. The name and identification number of each coating as applied on each coating line;
 - B. 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 day on each coating line;
 - C. On and after March 15, 1998, for coating lines subject to the limitations of 35 IAC 218.204(1)(2)(A) or (B), the weight of VOM per weight of solids in each coating as applied each day on each coating line and certified product data sheets for each coating; and
 - D. On and after March 15, 1998, for wood furniture coating spray booths subject to the limitations of 35 IAC 218.204 (1)(4)(A), the weight of VOM per weight of solids in each strippable spray booth coating as applied each day on each spray booth and certified product data sheets for each coating.
- c. Records of the testing of VOM and HAP content (wt%) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7) (e) of the Act]:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- d. The HAP content of the coatings and solvents used on the affected wood furniture coating line;

- e. Solvent usage, gal/month and gal/yr;
- f. VOM content of solvent;
- g. The operating schedule of the affected coating line;
- h. Results of filter inspections and dates of replacements;
- i. Monthly and the aggregate annual VOM and HAP emissions from the affected wood furniture coating lines based on the operating schedule and the typical hourly emission rate, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. The Permittee shall fulfill the reporting requirements of 40 CFR 63.807 in accordance to the applicability criteria of 40 CFR 63.800(d) and pertinent compliance approach of 40 CFR Subpart JJ.
- b. Pursuant to 35 IAC 218.211 (b)(6), the owner or operator of a source exempt from the limitations of 35 IAC 218.204 (1) because of Condition 7.1.4 (see also 35 IAC 218.208(b)), shall notify the Illinois EPA if the source's VOM emissions the limitations of Condition 7.1.6 (see also 35 IAC 218.208 (b)) by sending a copy of calculations showing such an exceedance within 30 days after the exceedance occurs.
- c. Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by 40 CFR 63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is December 6, 1998, the averaging calculation shall include data from December 1, 1998 to December 31, 1998.

- d. Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by 40 CFR 63.807(c).
 - i. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if Σ is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
 - ii. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- e. Pursuant to 218.211(c)(3), on and after a date consistent with 35 IAC 218.106, the owner or operator of a subject coating line shall notify the Agency in the following instances:
 - A. Any record showing violation of 35 IAC 218.204, shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation.
 - B. At least 30 calendar before changing the method of compliance from 35 IAC 218.204 to 35 IAC 218.205 or 35 IAC 218.207, the owner or operator shall comply with all requirements of (d)(1) or (e)(1) of 35 IAC 218.211, respectively. Upon changing the method of compliance from 35 IAC 218.204 to 35 IAC 218.205 or 35 IAC 218.207, the owner or operator shall comply with all requirements of 35 IAC 218.211 (d) or (e), respectively.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected paint spray booths without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Utilize any coating, thinner, or cleaning solvent in any of the wood furniture coating lines at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 and 7.1.6 are not exceeded and the affected wood furniture coating lines remains in compliance with 35 IAC 218.301 and 40 CFR 63 Subpart JJ.

7.1.12 Compliance Procedures

- a. Pursuant to 40 CFR 63.804(a), the Permittee shall comply with the provisions of 40 CFR 63.802(a)(1) by the following methods:
 - i. Calculate the average VHAP content for all finishing materials used at the facility using the following equation while maintaining a value of E no greater than 1.0;

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + S_nW_n) / (M_{c1} + M_{c2} + M_{cn}), \text{ (Equation 1).}$$

Where:

E = The emission limit achieved by an emission point or a set of emissions points, in kg VHAP/kg solids (lb VHAP/lb solids).

M_c = The mass of solids in finishing material "c" used monthly, kg solids/month (lb solids/month).

C_c = The VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile

hazardous pollutants per pound of coating solids (lb VHAP/lb solids).

S = The VHAP content of a solvent , expressed as a weight fraction, added to finishing materials.

W = The amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.

ii. Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

b. Compliance of each coating with the VOM emission limitations in Condition 7.1.3 shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formulae listed below:

$$\text{Coating VOM Emissions} = V \times D \times U$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

U = Overall coating usage (gal/mo & gal/yr)

$$\text{Cleaning solvent VOM Emissions} = V_1 \times D_1 \times U_1$$

Where:

V₁ = Percent VOM in the cleaning solvent (%)

D₁ = Overall cleaning solvent density (lb/gal)

U₁ = Overall cleaning solvent usage (gal/mo & gal/yr)

$$\text{Total VOM Emissions} = \text{Coating Emissions} + \text{Cleaning Solvent} - \text{VOM Waste}$$

c. Compliance provisions addressing the particulate matter limitations in this section are not set by this permit as compliance is assumed to be achieved by the normal work-practices, proper operation, and maintenance activities of an affected coating line.

7.2 Unit 02: Gluing Operation
 Control 02: Filters #1 & #2

7.2.1 Description

Two spray booths are used to assemble furniture frames using polyurethane foam pieces, wood structures, and a cement type of glue. Glue is applied using a hand-held air atomized spray gun.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	Glue/Coating Line-Mode 1 Glue Assembly Lines (PV-2 & PV-3)	Filter #1 and #2

7.2.3 Applicability Provisions and Applicable Regulations

- a. The frame gluing system is an "affected gluing operation" for purposes of these unit-specific conditions.
- b. Each affected coating line at the source is subject to 35 IAC 212.321(a), which requires that:

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, 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 IAC 212.321 [35 IAC 212.321(a)] (See Attachment 1).

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected gluing operation not being subject to 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, because the affected gluing operation does not meet the applicability of 35 IAC 218.920(a) and (b) and methylene chloride is not a VOM. In particular, the affected gluing operation has:

- i. Maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year; and
 - ii. A potential to emit for VOM that is less than 22.7 Mg (25 tons) per year.
- b. An affected gluing operation is not required to meet 35 IAC 218.301 and 218.302, Use of Organic Material, because the affected gluing operation emits methylene chloride, which is not by definition a VOM, pursuant to 35 IAC 211.7150.

7.2.5 Operational and Production Limits and Work Practices

Methylene chloride or any non-VOM material shall be the only materials used in or processed by the affected gluing operation, including clean-up operation for the glue coating line.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected gluing operation is subject to the following:

N/A

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected gluing operation to demonstrate compliance with Conditions 5.5.1, and 7.2.3 pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the adhesive usage for the affected gluing operation, gal/day and gal/yr;
- b. The methylene chloride content of the adhesive, % by wt.;
- c. Density of adhesives, lb/gal;

- d. The cleanup solvent usage for the affected gluing operation, gal/day and gal/yr;
- e. The VOM content of the cleanup solvent, wt. %;
- f. Density of cleanup solvent, lb/gal; and
- g. The aggregate monthly and annual HAP and VOM emissions from the affected gluing operation based on the adhesive and solvent usage, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected gluing operation with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that this emission unit is exempt from those requirements [35 IAC 218.990].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1, and 7.2.3, methylene chloride and VOM emissions from the affected gluing operation shall be calculated based on the following:

$$\text{Adhesive Methylene Chloride Emissions} = V \times D \times U$$

Where:

V = Percent methylene chloride in the adhesive (wt. %)

D = Adhesive density (lb/gal)

U = Adhesive usage (gal/mo and gal/yr)

Cleaning Solvent VOM Emissions = $V_1 \times D_1 \times U_1$

Where:

V_1 = Percent VOM in the cleaning solvent (wt. %)

D_1 = Overall cleaning solvent density (lb/gal)

U_1 = Overall cleaning solvent usage (gal/mo and gal/yr)

7.3 Unit 03: Woodworking Operations

Control 03: Filter #3 and Dust Collector #4
Filter #4 and Dust Collector #5, #6

7.3.1 Description

Woodworking operations consist manufacturing household furniture for coating operations. Such operations include drilling, sanding, sawing and storage room. All operations are controlled by filters and dust collectors.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	Routers	Dust Collector#4 and Filter #3
	Saws	
	Belt Sanders	
	Storage Room	Dust Collectors #5,#6 and Filter #4

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected woodworking operation" for the purpose of these unit-specific conditions, is a woodworking operation consisting of the equipment listed in Condition 7.3.2 controlled by a filter that is subject to 35 IAC 212 Subpart K.
- b. Each affected woodworking operation is subject to the emission limits identified in Condition 5.2.2.

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected woodworking operations not being subject to 35 IAC 212.321 because 35 IAC 212.681 exempts the source from these requirements.

7.3.5 Control Requirements

The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected woodworking operations are subject to the following:

- a. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Operating Hours (Hr/Yr)</u>	<u>Process Rate (lb/hr)</u>	<u>Particulate Matter Emissions (Lb/Hr)</u>	<u>(Ton/Yr)</u>
Woodworking Operations with Dust Collector	2,000	2,000	0.6	1.08

These limits are based on 59 lb/hr sawdust to the dust collector with a 99% efficiency. Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. The above limitations were established in Construction Permit 95050036, 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 CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.3.7 Operating Requirements

All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods, pursuant to 35 IAC 212.307.

7.3.8 Inspection Requirements

The Permittee shall visually inspect the filters and check the pressure drop on a regular basis in order to ensure proper operation of the dust collectors and the need for replacement.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected woodworking operation to demonstrate compliance with Conditions 5.5.1 and 7.3.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Records addressing use of good operating practices for the filters and dust collectors:

- i. Records for periodic inspection of the filters and dust collectors with date, individual performing the inspection, and nature of inspection; and
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- b. The operating schedule of the affected woodworking operation; and
- c. The aggregate monthly and annual PM emissions from the affected woodworking operation based on the operating schedule and the typical hourly emission rate, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected woodworking operation with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas below:

To determine compliance with Conditions 5.5.1, emissions from the affected woodworking operations shall be calculated based on the following:

$$PM = (\text{Air flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Dust Collector Efficiency } \%/100)]$$

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after September 6, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions,

methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air

Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee

shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Particulate Matter Emissions from Process Emission Units

10.1.1 35 IAC 212.321 Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

- a. Except as further provided in 35 IAC Part 212, 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 this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

$$E = A(P)^B$$

Where:

P = Process weight rate; and
E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units For Which
Construction of Modification Commenced On or After
April 14,1972

Metric		English	
P Mg/hr	E kg/hr	P Ton/hr	E lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and
E = Allowable emission rate in kg/hr or lbs/hr.

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

TK:jar

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Harbortown Division is located at 4800 West Roosevelt Road, Cook County. Harbortown Division foams filled household furniture assembly and distributes them. Raw materials are received, fabricated and/or assembled into finished furniture items, packaged, and shipped to a customer. Typical materials received are polyurethane foam, rolled vinyl or cloth fabric, polyester batting, polystyrene bead and cut wood. End products are bean bags, chair bags, futon frame with mattress, sofas, chairs, and ottomans.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Plant Emission Unit	Date Constructed	Emission Control Equipment
Group 01 Wood Coating Operations	Wood Frames are Sprayed with Water Reducible Acrylic Coating	PV-1 (Mode 2)	November, 1991	Filter #1
Group 02 Gluing Operations	Glue Application with Hand-Held Air-Atomized	PV-1 (Mode 1) PV-2 PV-3	November, 1991 February, 1995 February, 1995	Filter #1 & Filter #2
Group 03 Woodworking Operations	Collection of Dust from Router, Saws, Sand Belt and Storage Room	PV-4 PV-5 PV-6	February, 1989 April, 1992 March, 1992	Filters#3, #4 and Dust Collectors #4, #5, #6

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	3.46
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	0.93

Nitrogen Oxides (NO _x)	----
HAP, not included in VOM or PM	60.67
TOTAL	65.06

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant

Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

TK:jar