

FINAL DRAFT/PROPOSED CAAPP PERMIT
Valeo Climate Control
I.D. No.: 115015APG
Application No.: 00070061
March 6, 2002

217/782-2113

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

PERMITTEE

Valeo Climate Control
Attn: Wes Mueller, Plant Manager
625 Southside Drive
Decatur, Illinois 62521

Application No.: 00070061 I.D. No.: 115015APG
Applicant's Designation: Date Received: July 24, 2000
Operation of: Automotive Air Conditioning Components
Date Issued: !TO BE DETERMINED! Expiration Date²: !DATE!
Source Location: 625 Southside Drive, Decatur, Macon
Responsible Official: Wes Mueller, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE an automotive air conditioning components manufacturing plant, 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 Ernest Wallace at 217/782-2113.

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

DES:EEW:psj

cc: Illinois EPA, FOS, Region 3

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 -

FINAL DRAFT/PROPOSED CAAPP PERMIT
Valeo Climate Control
I.D. No.: 115015APG
Application No.: 00070061
March 6, 2002

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.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NOT APPLICABLE TO THIS PERMIT	16
7.0 UNIT SPECIFIC CONDITIONS	17
7.1 Degreasers	
7.2 Brazing Units	
7.3 Unit: Surface Treatment System Control: VBS-56 Scrubber	
7.4 Unit: Wastewater Treatment System Control: VBS-30 Scrubber	

1.0 SOURCE IDENTIFICATION

1.1 Source

Valeo Climate Control
625 Southside Drive - B
Decatur, Illinois 62521
217/362-2300

I.D. No.: 115015APG
Standard Industrial Classification: 3585, Air Conditioning and
Heating Equipment

1.2 Owner/Parent Company

Valeo Climate Control
4100 North Atlantic
Auburn Hills, Michigan 48326

1.3 Operator

Valeo Climate Control
625 Southside Drive - B
Decatur, Illinois 62521

Wes Mueller/Plant Manager
217/362-2355

1.4 General Source Description

Valeo Climate Control is located at 625 Southside Drive, Decatur.
The source produces evaporators for automotive air conditioners.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
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
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
cm	Centimeter
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	Degree Fahrenheit
ft	Foot
ft ³	Cubic Foot
gal	Gallon
HAP	Hazardous Air Pollutant
hr	Hour
HVAC	Heating Ventilation and Air Conditioning
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
in	Inch
kg	Kilogram
kW	Kilowatts
L	Liter
LAER	Lowest Achievable Emission Rate
lb	Pound
m	Meter
m ³	Cubic Meter
MACT	Maximum Achievable Control Technology
MEK	Methyl Ethyl Ketone
mg	Milligram
min	Minute
mmBtu	Million British thermal units
mo	Month

FINAL DRAFT/PROPOSED CAAPP PERMIT
Valeo Climate Control
I.D. No.: 115015APG
Application No.: 00070061
March 6, 2002

Mg	Megagram
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
OM	Organic Material
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
RMP	Risk Management Plan
scf	Standard Cubic Foot
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
TCE	Trichloroethylene
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
WWT	Wastewater Treatment
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:

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

- 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).

FINAL DRAFT/PROPOSED CAAPP PERMIT
 Valeo Climate Control
 I.D. No.: 115015APG
 Application No.: 00070061
 March 6, 2002

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Degreasers 1, 2, and 3	TCE Vapor Degreasers	12/91, 12/87, and 11/88	None
Auto-Brazing AB1 and AB2	Brazing of Aluminum Parts	6/1990	None
Vacuum-Brazing VB1 and VB2	Brazing of Aluminum Parts	6/1987	Smog Hogs
Surface Treatment System	Treating evaporator component surfaces	11/1988	Scrubber
Wastewater Treatment System	Treating wastewater from the HVAC manufacturing process	11/1988	Scrubber

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.
- 5.1.2 For purposes of the CAAPP and Title I of the Clean Air Act, Valeo Climate Control is considered a single source with Zexel Valeo Compressor USA, Inc., I.D. No. 115015ABM, also located at 625 Southside Drive, Decatur. The source has elected to obtain separate CAAPP permits for this location.

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. 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 Ozone Depleting Substances

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 [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements

of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

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

N/A

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)	105.23
Sulfur Dioxide (SO ₂)	8.22
Particulate Matter (PM)	8.62
Nitrogen Oxides (NO _x)	3.42
HAP, not included in VOM or PM	---
TOTAL	125.48

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 Records for Operating Scenarios

N/A

5.6.3 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.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for the previous calendar year; and
- b. The total annual emissions of all HAPs combined 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 HAP Emissions

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

FINAL DRAFT/PROPOSED CAAPP PERMIT

Valeo Climate Control

I.D. No.: 115015APG

Application No.: 00070061

March 6, 2002

For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each organic liquid times the VOM emissions contributed by that organic liquid is acceptable.

FINAL DRAFT/PROPOSED CAAPP PERMIT
Valeo Climate Control
I.D. No.: 115015APG
Application No.: 00070061
March 6, 2002

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Degreasers

7.1.1 Description

Three trichloroethylene (TCE) vapor degreasers are utilized to clean aluminum plates of machine oil after the stamping process and before the jig assembly process in the production of evaporators for automotive air conditioners.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Degreasers 1, 2, and 3	TCE vapor degreasers	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected solvent cleaning machines" for the purpose of these unit-specific conditions, are the solvent degreasers as specified in Conditions 7.1.1 and 7.1.2.
- b. The affected solvent cleaning machines are subject to the NESHAP for Halogenated Solvent Cleaning, 40 CFR 63 Subparts A and T, because they use a solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
- c. The affected solvent cleaning machines are subject to 35 IAC 218.184, Conveyorized Degreasing.

7.1.4 Non-Applicability of Regulations of Concern

The affected solvent cleaning machines using trichloroethylene as a cleaning solvent are not subject to 35 IAC 218.301, unless an odor nuisance exists, because trichloroethylene is not considered a photochemically reactive material.

7.1.5 Operational and Work Practices and Control Requirements

- a. The Permittee shall ensure that each existing in-line vapor solvent cleaning machine conforms to the following design requirements specified in paragraph (a)(i) through (a)(vi) of this section [40 CFR 63.463 (a)]:
 - i. Each cleaning machine shall be designed and operated with an idling and downtime mode cover, as described in Condition 7.1.5(c)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects. [40 CFR 63.463(a)(1)(i)].
 - ii. Each cleaning machine shall have a freeboard ratio of 0.75 or greater.
 - iii. Each cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - iv. Each vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - v. Each vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
 - vi. Each vapor cleaning machine shall have a primary condenser.
- b. Each owner or operator of an existing in-line cleaning machine shall comply with the control combination listed below: [40 CFR 63.463(c)(1)(i)]

Option 2: Freeboard refrigeration device,
freeboard ratio of 1.0.

c. Each owner or operator of an existing in-line solvent cleaning machine shall meet all of the following required work and operational practices specified in paragraphs (c)(i) through (xi) of this section as applicable.

i. Control air disturbances across the cleaning machine opening(s) by incorporating the following control equipment. [40 CFR 63.463(d)(1)(i)]

Cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

ii. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine). [40 CFR 63.463(d)(3)]

iii. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Illinois EPA. [40 CFR 63.463(d)(4)]

iv. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped. [40 CFR 63.463(d)(5)]

v. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater. [40 CFR 63.463(d)(6)]

vi. During shutdown of each vapor cleaning machine, the sump heater shall be turned off

- and the solvent vapor layer allowed to collapse before the primary condenser is turned off. [40 CFR 63.463(d)(7)]
- vii. When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface. [40 CFR 63.463(d)(8)]
 - viii. Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the USEPA's satisfaction to achieve the same or better results as those recommended by the manufacturer. [40 CFR 63.463(d)(9)]
 - ix. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning procedures in appendix A to 40 CFR 63 Subpart T if requested during an inspection by the Illinois EPA. [40 CFR 63.463(d)(10)]
 - x. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container. [40 CFR 63.463(d)(11)]
 - xi. Sponges, fabric, wood, and paper products shall not be cleaned. [40 CFR 63.463(d)(12)]
- d. Each owner or operator of a solvent cleaning machine complying with paragraph (b) of this section shall comply with the requirements specified in paragraphs (d)(i) through (ii) of this section. [40 CFR 63.463(e)]
- i. Determine during each monitoring period whether each control device used to comply with these standards meets the requirements

specified in paragraphs (d)(i)(A) and (B) of this section.

- A. If a freeboard refrigeration device is used to comply with these standards, the owner or operator shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point. [40 CFR 63.463(e)(2)(i)]
 - B. If an idling-mode cover is used to comply with these standards, the owner or operator shall comply with the requirements specified in paragraphs (d)(i)(B)(1) and (d)(i)(B)(2) of this section. [40 CFR 63.463(e)(2)(iv)]
 - 1. Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - 2. Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.
- ii. If any of the requirements of paragraph (d)(i) of this section are not met, determine whether an exceedance has occurred using the criteria in paragraphs (d)(ii)(A) and (d)(ii)(B) of this section. [40 CFR 63.463(e)(3)]
- A. An exceedance has occurred if the requirements of paragraph (d)(i)(B)(1) of this section have not been met.
 - B. An exceedance has occurred if the requirements of paragraphs (d)(i)(A) or (d)(i)(B)(2) of this section have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required

levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

- e. Operating Requirements: No person shall operate a conveyORIZED degreaser unless: [35 IAC 215.184(a)]
 - i. Exhaust ventilation exceeding 20 cubic meters per minute per square meter (65 cubic feet per minute per square foot) of area of loading and unloading opening is not used, unless necessary to meet the requirements of the Occupational Safety and Health Act (29 U.S.C. Section 651 et seq.);
 - ii. Solvent carryout emissions are minimized by:
 - 1. Racking parts for best drainage; and
 - 2. Maintaining the vertical conveyor speed at less than 3.3 m/min (11 ft/min);
 - iii. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - iv. Solvent leaks are repaired immediately;
 - v. Water is not visually detectable in solvent existing from the water separator; and
 - vi. Downtime covers are placed over entrances and exits of conveyORIZED degreasers immediately after the conveyors and exhausts are shut down and not removed until just before startup.
- f. Equipment Requirements: No person shall operate a conveyORIZED degreaser unless: [35 IAC 215.184(b)]
 - i. The degreaser is equipped with a drying tunnel, rotating (tumbling) basket or other equipment sufficient to prevent cleaned parts from carrying out solvent liquid or vapor;

- ii. The degreaser is equipped with the following switches:
 - A. A device which shuts off the sump heat source if the amount of condenser coolant is not sufficient to maintain the designed vapor level;
 - B. A device which shuts off the spray pump or the conveyor if the vapor level drops more than 10 cm (4 in) below the bottom condenser coil; and
 - C. A device which shuts off the sump heat source when the vapor level exceeds the design level.
- iii. The degreaser is equipped with openings for entrances and exits that silhouette workloads so that the average clearance between the parts and the edge of the degreaser opening is less than 10 cm (4 in) or less than 10 percent of the width of the opening;
- iv. The degreaser is equipped with downtime covers for closing off entrances and exits when the degreaser is shut down; and
- v. The degreaser is equipped with one of the following control devices, if the air/vapor interface is larger than 2.0 square meters (21.6 square feet):
 - A. A carbon adsorption system with ventilation greater than or equal to 15 cubic meters per minute per square meter (50 cubic feet per minute per square foot) of air/vapor area (when downtime covers are open, and exhausting less than 25 ppm of solvent by volume averaged over a complete adsorption cycle; or
 - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA. Such equipment or system may include a refrigerated chiller.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected solvent cleaning machines are subject to the following:

Emissions of VOM from all three conveyORIZED degreasers shall not exceed 47.22 tons/year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

The above limitation was established in Permit 87120009, 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].

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

- a. For a freeboard refrigeration device, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode and record the results on a weekly basis. [40 CFR 63.466(a)(1)]
- b. For an idling-mode cover, the owner or operator shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects and record the results on a monthly basis. [40 CFR 63.466(b)(1)]

- c. Each owner or operator of an in-line solvent cleaning machine shall monitor the hoist speed as described in paragraphs (c)(i) through (c)(iv) of this section. [40 CFR 63.466(c)]
- i. The owner or operator shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - ii. The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.
 - iii. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
 - iv. If an owner or operator can demonstrate to the Illinois EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected solvent cleaning machine to demonstrate compliance with Conditions 5.5.1, 7.1.3, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Each owner or operator of an in-line solvent cleaning machine shall maintain records in written or electronic form specified in paragraphs (a)(i) through (iii) of this section for the lifetime of the machine. [40 CFR 63.467(a)]

- i. Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment. [40 CFR 63.467(a)(1)]
 - ii. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted. [40 CFR 63.467(a)(2)]
 - iii. Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of this subpart. [40 CFR 63.467(a)(5)]
- b. Each owner or operator of an in-line solvent cleaning machine shall maintain records specified in paragraphs (b)(i) through (b)(iii) of this section either in electronic or written form for a period of 5 years. [40 CFR 63.467(b)]
- i. The results of control device monitoring required under Condition 7.1.8. [40 CFR 63.467(b)(1)]
 - ii. Information on the actions taken to comply with Condition 7.1.5(d). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels. [40 CFR 63.467(b)(2)]
 - iii. Estimates of annual solvent consumption for each solvent cleaning machine. [40 CFR 63.467(b)(3)]
- c. Monthly hours of operation of each affected solvent cleaning machine and monthly VOM emissions (tons/mo).

7.1.10 Reporting Requirements

FINAL DRAFT/PROPOSED CAAPP PERMIT

Valeo Climate Control

I.D. No.: 115015APG

Application No.: 00070061

March 6, 2002

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected solvent cleaning machine 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.
- b. Each owner or operator of an in-line solvent cleaning machine shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified in paragraphs (b)(i) and (b)(ii) of this section and shall summarize VOM emissions and compliance with all applicable requirements. [40 CFR 63.468(f)]
 - i. A signed statement from the source owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in Condition 7.1.5(c)(ix). [40 CFR 63.468(f)(1)]
 - ii. An estimate of solvent consumption and VOM emissions for each solvent cleaning machine during the reporting period. [40 CFR 63.468(f)(2)]
 - A. Identification of each degreasing solvent used;
 - B. Annual usage (gal/yr) of each degreasing solvent;
 - C. VOM content (lb/gal) of each degreasing solvent, excluding water and exempt compounds;
 - D. Annual hours of operation for each degreaser (hr/yr); and;
 - E. Total annual VOM emissions (tons/yr).

FINAL DRAFT/PROPOSED CAAPP PERMIT

Valeo Climate Control

I.D. No.: 115015APG

Application No.: 00070061

March 6, 2002

- c. Each owner or operator of a batch vapor or in-line solvent cleaning machine shall submit an exceedance report to the Illinois EPA semiannually except when, the Illinois EPA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph (d) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs (c)(i) through (iii) of this section. [40 CFR 63.468(h)]
 - i. Information on the actions taken to comply with Condition 7.1.5(d). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - iii. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- d. An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in paragraphs (d)(i) through (d)(iii) of this section are met. [40 CFR 63.468(i)]
 - i. The source has demonstrated a full year of compliance without an exceedance.

- ii. The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63 Subpart A (General Provisions) and in this permit.
 - iii. The Illinois EPA does not object to a reduced frequency of reporting for the affected source as provided in 40 CFR Part 63 paragraph (e)(3)(iii) of subpart A (General Provisions).
- e. Emissions of VOM from the affected solvent cleaning machines in excess of the limits specified in Condition 7.1.6 shall be reported to the Illinois EPA within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

To determine compliance with Conditions 5.5.1 and 7.1.6, VOM and HAP emissions from each affected solvent cleaning machine shall be calculated based on the recordkeeping requirements in Condition 7.1.9 and by the use of the formulae listed below:

$$E = U \times C \times 0.0005 \text{ T/lb}$$

E = VOM emission rate (T/mo)

U = Solvent usage (gal/mo)

C = VOM content of degreasing solvent (lb/gal)

7.2 Brazing Units

7.2.1 Description

The vacuum-braze process brazes the evaporator components and nozzle pipes together in a vacuum-brazing furnace and provides the required seal of the materials. The furnace is equipped with electric heaters.

The auto-braze process welds/brazes aluminum pipes onto the component nozzles of the assembled evaporator. This process utilizes propane to fire the autobrazers.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Auto-Brazing AB1 and AB2	Brazing of Aluminum Parts	None
Vacuum-Brazing VB1 and VB2	Brazing of Aluminum Parts	Smog Hog

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected brazing unit" for the purpose of these unit-specific conditions, is each unit described in Condition 7.2.1 and 7.2.2 above.
- b. Each affected brazing unit is subject to the emission limits identified in Condition 5.2.2.
- c. Each affected brazing unit is subject to 35 IAC 212.321, which provides 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 which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

The allowable particulate matter emission limits for the affected emission units may be calculated based upon the following emission factors and formulas:

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

Where:

E = Allowable particulate matter emission rate
 P = Process weight rate

For process weight rates up to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

For process weight rate equal to or in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in the following exception: If no odor nuisance exists the limitation of this condition shall apply only to photochemically reactive material. [35 IAC 215.301]
- e. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm. [35 IAC 214.301]

7.2.4 Non-Applicability of Regulations of Concern

N/A

7.2.5 Control Requirements

None

7.2.6 Emission Limitations

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

- a. This permit is issued based upon a minimal hourly emission rate and negligible annual emissions (less than 0.1 lb/hr and 0.44 ton/year of all contaminants) from the two autobrazing stations.
- b. This permit is issued based upon maximum emissions of particulate matter of 0.9 lbs/hour and 2.9 tons/year from the two vacuum brazers.
- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

The above limitations were established in Permit 87120009, 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].

7.2.7 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 each affected brazing unit to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Material throughput (ton/mo);
- b. Propane usage (gal/mo);
- c. Hours of operation (hr/mo); and
- d. Aggregate monthly and annual PM, HAP, and VOM emissions with supporting calculations.
- e. Records addressing use of good operating practices for the brazing unit and any emission control equipment:
 - i. Records for periodic inspection of the equipment 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.

7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected brazing unit 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.

- b. Emissions of particulate matter from the affected brazing units in excess of the limits specified in Condition 7.2.6 shall be reported to the Illinois EPA within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

To determine compliance with Conditions 5.5.1, 7.2.3, and 7.2.6, emissions from each affected brazing unit shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of the emission factors and formulae listed below:

For natural gas emissions:

<u>Pollutant</u>	<u>Emission Factor</u> (lb/10 ³ gal)
NO _x	13.2
CO	11.2
PM	1.01
VOM	0.74
SO ₂	0.01

These are the emission factors for the brazing stations using uncontrolled natural gas combustion, Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, March 1998.

Brazing unit emissions (tons) = natural gas consumed multiplied by the appropriate emission factor/2000

For hourly emissions from brazing units (lb), take the monthly emissions in tons divided by hours/month and multiply by 2000.

7.3 Unit: Surface Treatment System
 Control: VBS-56 Scrubber

7.3.1 Description

Pressurized, assembled evaporator component exteriors are treated by a surface treatment system. First, the component surfaces are etched utilizing a phosphoric acid bath. Second, component surfaces are treated with chromic acid and hydrogen fluoride. Third, component surfaces are further treated with a hydrophilic process, which utilizes sodium silicate. A surface treatment scrubber collects vapors from a side draft hood coming off the surface treatment operations. This is a packed-type scrubber with spray nozzles that treats gaseous emissions. Clean air is discharged to the atmosphere while the condensate (dichromate and phosphoric acid) is pumped to the wastewater treatment system.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Surface Treatment System VBS-56	Treating evaporator component surfaces	Scrubber

7.3.3 Applicability Provisions and Applicable Regulations

- a. The Surface Treatment System identified in Conditions 7.3.1 and 7.3.2 is an "affected treatment system" for the purpose of these unit-specific conditions.
- b. Each affected treatment system is subject to the emission limits identified in Condition 5.2.2.
- c. Each affected treatment system is subject to 35 IAC 212.321, which provides 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 which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates

specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

The allowable particulate matter emission limits for the affected emission units may be calculated based upon the following emission factors and formulas:

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

Where:

E = Allowable particulate matter emission rate

P = Process weight rate

For process weight rates up to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

For process weight rate equal to or in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

7.3.4 Non-Applicability of Regulations of Concern

The affected surface treatment system is not subject to 40 CFR 63 Subpart N: National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, because the source is not performing hard chromium electroplating, decorative chromium electroplating, or chromium anodizing. [40 CFR 63.340(a)]

7.3.5 Control Requirements

None

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.3.7 Testing Requirements

Measurement of particulate matter emissions from stationary emission units shall be conducted by the applicable method in accordance with 40 CFR part 60, Appendix A: [Section 212.110 of the Act]

- a. Upon a written notification by the Agency, the owner or operator of a particulate matter emission unit shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions to demonstrate compliance. Such test results shall be submitted to the Agency within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Agency. [Section 212.110(c) of the Act]
- b. A person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Agency of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Agency. Such notification shall state the specific test methods that will be used.
- c. The owner or operator of an emission unit subject to particulate matter testing shall retain records of all tests which are performed for at least three (3) years after the date a test is performed.

7.3.8 Monitoring Requirements

For the affected treatment system, the owner or operator shall periodic monitor the water level, cleanliness, water spray, duct, and air flow to ensure they are working properly. [Section 39.5(7)(b) of the Act]

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 treatment system 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 packed-type scrubber:
 - i. Records for periodic inspection of the packed-type scrubber 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 affected treatment system.
- c. Phosphoric acid usage, gal/mo and gal/yr.
- d. Chromic acid usage, gal/mo and gal/yr.
- e. Monthly and annual aggregate particulate matter emissions from the affected treatment system shall be maintained, based on the operating schedule and 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 treatment system 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

FINAL DRAFT/PROPOSED CAAPP PERMIT
Valeo Climate Control
I.D. No.: 115015APG
Application No.: 00070061
March 6, 2002

7.3.12 Compliance Procedures

To determine compliance with Conditions 5.5.1 and 7.3.3, PM emissions from each affected treatment system shall be calculated based on the testing, monitoring, and recordkeeping requirements in Conditions 7.3.7, 7.3.8, and 7.3.9.

7.4 Unit: HVAC Wastewater Treatment System
 Control: VBS-30 Scrubber

7.4.1 Description

The source's wastewater treatment (WWT) system is a fully enclosed facility that processes liquid and gaseous wastes from the surface treatment system, Nitric Acid tank, water bath, cleaner, dehydrator, and other evaporator manufacturing processes. Emissions from the WWT system are controlled by a packed-type scrubber for odor control. Pollutants treated in the system include phosphoric acid, chromic acid, hydrogen fluoride, sodium silicate, and nitric acid. The majority of the VOM in the wastewater treated by this system is biodegraded and that which is stripped out is controlled by the enclosure/scrubber system. Treated water from this system is discharged to the sanitary sewer while the condensate is fed back into the wastewater treatment system. Final wastes are disposed of according to the Waste Generator Permit through off-site hauling by a licensed contractor.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
WWT System VBS-30	Wastewater Treatment System for the HVAC manufacturing process	Scrubber

7.4.3 Applicability Provisions and Applicable Regulations

- a. The Wastewater Treatment System identified in Conditions 7.4.1 and 7.4.2 is an "affected wastewater treatment plant" for the purpose of these unit-specific conditions.
- b. No person shall use any single or multiple compartment effluent water separator which receives effluent water containing 757 l/day (200 gal/day) or more of organic material from any equipment processing, refining, treating, storing or handling organic material unless such effluent water separator is equipped with air pollution control equipment capable of reducing by 85 percent or more the uncontrolled organic material emitted to the

FINAL DRAFT/PROPOSED CAAPP PERMIT

Valeo Climate Control

I.D. No.: 115015APG

Application No.: 00070061

March 6, 2002

atmosphere. Exception: If no odor nuisance exists the limitations of this subparagraph shall not apply if the vapor pressure of the organic material is below 17.24 kPa (2.5 psia) at 294.3°K (70°F) [35 IAC 215.141(a)].

- c. No person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of volatile organic liquid with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions [35 IAC 215.142].
- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.303, 215.304, and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material [35 IAC 215.301].

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected wastewater treatment plant is not subject to the NESHAP for Pharmaceuticals Production, 40 CFR 63 Subparts A and GGG, because the source is not a major source of HAPs.
- b. The affected wastewater treatment plant is not subject to the NSPS for Sewage Treatment Plants, 40 CFR 60 Subpart O, because there is no incinerator that combusts wastes containing more than 10 percent sewage sludge (dry basis) produced by municipal sewage treatment plants, or an incinerator that charges more than 1000 kg (2205 lb) per day municipal sewage sludge (dry basis) associated with this affected wastewater treatment plant.
- c. The affected wastewater treatment plant is not subject to the NSPS for VOC Emissions From Petroleum Refinery Wastewater Systems, 40 CFR 60 Subpart QQQ, because the affected wastewater plant is not located at a petroleum refinery.

- d. The affected wastewater treatment plant is not subject to 35 IAC 215.443, Wastewater (Oil/Water) Separator, because the affected wastewater treatment plant is not located at a petroleum refinery.
- e. The affected wastewater treatment plant is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because it does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.4.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the packed type scrubber including periodic inspection, routine maintenance and prompt repair of defects.

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Testing Requirements

Pursuant to Section 39.5(7)(b) of the Act, testing for the vapor pressure of the organic material in the effluent water received by the effluent water separator or discharged from any pump or compressor shall be performed as follows:

Upon reasonable request by the Illinois EPA, the vapor pressure of the organic material in the effluent water received by the effluent water separator or discharged from any pump or compressor shall be determined according to ASTM D2879-83, Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope (see 40 CFR 60.17(a)(37)).

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected wastewater treatment facility to demonstrate compliance with Conditions 5.5.1 and 7.4.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the testing of the organic material in the effluent water pursuant to Condition 7.4.7, 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.
- b. Records addressing use of good operating practices for the packed-type scrubber:
 - i. Records for periodic inspection of the WWT scrubber 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.
- c. The operating schedule of affected wastewater plant; and
- d. Monthly and annual individual and aggregate VOM and HAP emissions from the affected wastewater plant shall be maintained, based on the operating schedule and typical hourly emission rate, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected wastewater treatment plant 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:

- a. The Permittee shall notify the Illinois EPA of a determination that vapor pressure of the organic material in the effluent water received by the effluent water separator is equal to or above 17.24 kPa (2.5 psia) at 294.3°K (70°F) within 30 calendar days of such an occurrence.
- b. Emissions of VOM, in excess of the limits in Condition 5.5.3 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulae listed below:

- a. Compliance with Conditions 7.4.3(b) and (c) is addressed by sampling the effluent water received by the effluent water separator or discharged from any pump or compressor to verify that the vapor pressure of the organic material is below 17.24 kPa (2.5 psia) at 294.3°K (70°F).
- b. For the purpose of estimating VOM emissions from the affected wastewater tanks, to determine compliance with Condition 5.5.1, the emission factors and formulae specified in Section 4.3, Waste Water Collection, Treatment and Storage, of AP-42, Volume I, Fifth Edition, January, 1995 are acceptable.

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 _____ (**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:

FINAL DRAFT/PROPOSED CAAPP PERMIT

Valeo Climate Control

I.D. No.: 115015APG

Application No.: 00070061

March 6, 2002

- 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
2009 Mall Street
Collinsville, Illinois 62234
 - 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 (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

FINAL DRAFT/PROPOSED CAAPP PERMIT

Valeo Climate Control

I.D. No.: 115015APG

Application No.: 00070061

March 6, 2002

- 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

FINAL DRAFT/PROPOSED CAAPP PERMIT
Valeo Climate Control
I.D. No.: 115015APG
Application No.: 00070061
March 6, 2002

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 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: _____

10.2 Attachment 2 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule,

marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or

FINAL DRAFT/PROPOSED CAAPP PERMIT
Valeo Climate Control
I.D. No.: 115015APG
Application No.: 00070061
March 6, 2002

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
 Division Of Air Pollution Control -- Permit Section
 P.O. Box 19506
 Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

22. Technical contact person for application:	23. Contact person's telephone number:
---	--

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.
3. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
4. Information addressing any outstanding transfer agreement pursuant to the ERMS.
5.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
 - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised

FINAL DRAFT/PROPOSED CAAPP PERMIT
Valeo Climate Control
I.D. No.: 115015APG
Application No.: 00070061
March 6, 2002

fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP
PERMIT, if necessary.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

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

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.

This Valeo Climate Control facility is located at 625 Southside Drive, Decatur, Illinois. The source is a manufacturer of evaporators for automotive air conditioners.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Degreasers 1, 2, and 3	TCE Vapor Degreasers	12/91, 12/87, and 11/88	None
Auto-Brazing AB1 and AB2	Brazing of Aluminum Parts	6/1990	None
Vacuum-Brazing VB1 and VB2	Brazing of Aluminum Parts	6/1987	Smog Hogs
Surface Treatment System	Treating evaporator component surfaces	11/1988	Scrubber
Wastewater Treatment System	Treating wastewater from the HVAC manufacturing process	11/1988	Scrubber

III. EMISSIONS

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

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	105.23
Sulfur Dioxide (SO ₂)	8.22
Particulate Matter (PM)	8.62
Nitrogen Oxides (NO _x)	3.42
HAP, not included in VOM or PM	---
TOTAL	125.48

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.

Page 2

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 166.

EEW:psj