

217/782-2113

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

PERMITTEE

OMC - Waukegan Lakefront Operations
Attn: Anthony M. Montemurro
90 Sea-Horse Drive
Waukegan, Illinois 60085

Application No.: 95120156 I.D. No.: 097190AAK
Applicant's Designation: Date Received: December 11, 1995
Operation of: Marine Engine Component Parts Manufacturing
Date Issued: October 18, 1999 Expiration Date²: October 18, 2004
Source Location: 90 Sea-Horse Drive, Waukegan, Lake County
Responsible Official: Terry D. Schneider, Plant Manager-OMC Waukegan

This permit is hereby granted to the above-designated Permittee to OPERATE a marine engine component parts manufacturing plant (OMC Waukegan) and a research and development operation (OMC Product Development Center), pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: March 12, 2001
Revision Date Issued: October 10, 2002
Purpose of Revision: Significant Modification

This significant modification removes emission units which were purchased by Bombardier Motor Corporation of America (Illinois EPA I.D. No. 097190AGD). In addition, Section 6 is revised to reflect that the source is no longer a participating source for the Emissions Reduction Market System.

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

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

DES:JS:psj

cc: Illinois EPA, FOS, Region 1
USEPA

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

² Except as provided in Condition 8.7 of this permit.

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	10
5.0 OVERALL SOURCE CONDITIONS	11
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 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)	18
6.1 Description of ERMS	
6.2 Applicability	
6.3 Obligation to Hold Allotment Trading Units (ATUs)	
6.4 Market Transactions	
6.5 Emissions Excursion Compensation	
6.6 Quantification of Seasonal VOM Emissions	
6.7 Annual Account Reporting	
6.8 Allotment of ATUs to the Source	
6.9 Recordkeeping for ERMS	
6.10 Exclusions from Further Reductions	
7.0 UNIT SPECIFIC CONDITIONS	25
7.1 Aluminum Melting Operations	
7.2 Polishing and Shotblasting Operations	
7.3 Coating Lines	
7.4 Boilers and Air Make-up Units	

	<u>PAGE</u>
8.0 GENERAL PERMIT CONDITIONS	49
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	
8.6 Reporting Requirements	
8.7 Obligation to Comply with Title I Requirements	
9.0 STANDARD PERMIT CONDITIONS	54
9.1 Effect of Permit	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirements for Compliance Certification	
9.9 Certification	
9.10 Defense to Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening And Reissuing Permit For Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	
10.0 ATTACHMENTS	
10.1 Attachment 1 - Tables of contemporaneous increases and decreases	1-1
10.2 Attachment 2 - Example Certification by a Responsible Official	2-1
10.3 Attachment 3 - Particulate Matter Emissions from Process Emission Units	3-1
10.4 Attachment 4 - Adjusted Standard for Die Cast Operation	4-1
10.5 Attachment 5 - Guidance on Revising This Permit	5-1
10.6 Attachment 6 - Form 199-CAAPP, Application For Construction Permit (For CAAPP Sources Only)	6-1
10.7 Attachment 7 - Guidance on Renewing This Permit	7-1

1.0 SOURCE IDENTIFICATION

1.1 Source

OMC - Waukegan Lakefront Operations
90 Sea-Horse Drive
Waukegan, Illinois 60085
847/689-5363

I.D. No.: 097190AAK

Standard Industrial Classification: 3363, Aluminum Die Castings

334, Secondary Aluminum
Smelting and Refining

3479, Coating, Engraving, and
Allied Service

1.2 Owner/Parent Company

Outboard Marine Corporation
100 Sea-Horse Drive
Waukegan, Illinois 60085

1.3 Operator

OMC Waukegan
90 Sea-Horse Drive
Waukegan, Illinois 60085

Anthony M. Montemurro
847/689-5363

1.4 General Source Description

The source consists of the OMC Waukegan Manufacturing Plant, located at 90 Sea-Horse Drive, Waukegan, Illinois. The manufacturing plant produces component parts for marine engines and other applications.

2.0 LIST OF ABBREVIATIONS

@	at the rate of
ACMA	Alternate Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	degree Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CE	control equipment
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CTG	Control Technique Guidelines
ERMS	Emission Reduction Market System
°F	degree Fahrenheit
ft	feet
ft ³	cubic foot
ft ³	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
HCl	Hydrochloric Acid
HEAF	high efficiency air filter
hr	hour
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ID	interior diameter
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kPa	kilopascal
kW	Kilowatt
LAER	Lowest Achievable Emission Rate
lb	pound
m	meter
MACT	Maximum Achievable Control Technology
MEK	Methyl Ethyl Ketone
Mg	Megagram
mmft ³	million cubic feet
mmBtu	million British thermal unit per hour
mmscf	million standard cubic feet
mo	month
MSDS	Material Safety Data Sheet
MW	molecular weight
mw	megawatt
No.	Number
NO _x	Nitrogen Oxides
OD	outer diameter

PM	Particulate Matter
PM ₁₀	Particulate Matter Less Than 10 Micron
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds square inch atmospheric
RMP	Risk Management Plan
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SOCMI	Synthetic Organic Chemical Manufacturing Industry
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
TPY	Ton Per Year
USEPA	United States Environmental Protection Agency
VOL	volatile organic liquid
VOM	Volatile Organic Material
wk	week
wt.	weight
wt. %	weight percentage
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:

Aluminum Heat Treat Furnace (Gas Fired)
Heated Die Cleaning Tank
2-Stage Parts Washer (Belt)
V-4 Drilling, Tapping, Honing, And Cleaning
(Cyclotron)
9.9/15 HP Honing And Cleaning (Cyclotron)
Hydromation Units
3-Stage Washer on Production Paint Line
Room Air Make-Up Units - Production Paint System
Chromate Conversion Coating Lines

- 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:

Aluminum Aging Furnace (0.35 mmBtu/hr)
Dry-Off Oven (1 mmBtu/hr)
Imprex (Thermally Activated Polymer Immersion)
Receiving Area Oven
EDM Machines (Electrical Discharge)
Plant 2 Wastewater Treatment System
Aluminum Induction Furnaces
Tool Room-Polishing, Sawing, And Milling
Grinders for Aluminum Castings
V-4 Journal Flybores

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

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

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Die casting machines where a metal or plastic is formed under pressure in a die [35 IAC 201.210(a)(12)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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

3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Certified Reverberatory Furnace	07/1984	Afterburner
02	Warwick Dry Hearth Furnace	02/1977	None
03	Schaefer Reverberatory Furnace	04/1990	None
04	Vacuum Die Cast Reverberatory Furnace	06/1995	None
05	Polishing Line A (5 Lathes: LB-979, 964, 981, 82109, and 83106)	Prior to 1972 (except LB-82109 and 83106)	Rotoclone A (Water Scrubber)
06	Polishing Line B (4 Lathes: LB-309, 978, 2108, and 3107)	Prior to 1972 (except LB-2108 and 3107)	Rotoclone B (Water Scrubber)
07	Polishing Lathe With Rotoclone (Trim Building)	01/1993	Rotoclone Wet Dust Collector (Water Scrubber)
08	Polishing Lathe With Handte (Trim Building)	1990	Handte Wet Dust Collector (Water Scrubber)
09	Shot Blasting Operation	10/1968	Wheelabrator Fabric Filter
10	Production Paint System	10/1994	Prime Booth Filter and Finish Booth Filter
11	Exhibits Paint Booth	10/1994	Dry Filters
12	Jet Melter Furnace	1998	None
15	Plant 2 West Boiler Room	10/1952	None
16	Plant 2 North Boiler Room	10/1997	None
18	Smelter Building Air Makeup Units	1974	None
19	Die Cast Building Air Make Up Units	06/1974	None
20	Trim Building Air Make Up Units	1974	None
Fugitive VOM Emissions	Component Leaks	-	None

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 emissions.
- 5.1.2 This permit is issued based on the source being a major source of HAPs.

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 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and

shall be submitted to the Illinois EPA [35 IAC 212.312].

- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.2.4 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.

5.2.5 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.

- 5.2.6 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.
- c. This stationary source will be subject to the rules listed below when such rules becomes final and effective. The Permittee shall comply with the applicable requirements of such regulations by the date(s) specified in such regulations and shall certify compliance with the applicable requirements of such regulations as part of the annual compliance certification required by 40 CFR Part 70 or 71 beginning in the year that compliance is required under a final and effective rule.
- i. 40 CFR Part 63, Subpart MMMM, Misc. Metal Parts and Products (Surface Coating); and
- ii. 40 CFR Part 63, Subpart DDDDD, Industrial, Commercial and Institutional Boilers and Process Heaters.

5.2.7 Episode Action Plan

- a. 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.

5.2.8 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

- 5.2.9 The die cast machines, included as insignificant activities in Condition 3.1.3, are regulated by an adjusted standard granted to this facility (Ref. AS 94-3, Date issued 12/7/1995). A summary of this adjusted standard is included in Attachment 4.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

The Permittee is allowed to substitute raw materials as long as the substitution does not violate an applicable

regulation, any permit limitation and any other requirements of this permit.

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)	742.00
Sulfur Dioxide (SO ₂)	4.00
Particulate Matter (PM)	118.00
Nitrogen Oxides (NO _x)	272.00
HAP, not included in VOM or PM	---
TOTAL	1,136.00

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a major source for HAPs.

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 deviation with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility

The Permittee may substitute materials and miscellaneous equipment used at this source provided the use of the substituted material or equipment does not violate applicable regulations or result in an exceedance of the emission limits of this permit and the changes do not constitute a modification under Title I of the CAA (See also Condition 8.4.2).

5.9 General Compliance Procedures

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

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 83 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 9.4822 tons per season.

A. This determination includes the use of 1994 and 1996 as baseline seasons.

B. This determination also includes adjustment to actual emissions to account for voluntary over-compliance at the source, e.g., usage of cleaning solvent with VOM content less than required, pursuant to 35 IAC 205.320(d), as further addressed in Section 7 of this permit.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

The source was issued a construction permit prior to January 1, 1998 for the following new or modified emission units for which three years of operational data is not yet available:

Emission Unit	Construction Permit No.	Date Issued	Maximum Available Allotment	Explanation of Maximum Allotment
Boilers #3 and #4	97060070	9/10/1997	0.2917 T/Season	5/12 of Annual Limit

In accordance with 35 IAC 205.310(h) and 35 IAC 205.320(f), the source shall submit a written request for, or an application for, a revised emissions baseline and allotment which address these emission units by December 1 of the year of the third complete seasonal allotment period in which each such newly constructed or modified emission unit is operational. Such submittal shall include information from the affected emission units on the seasonal emissions for these first three seasonal allotment periods.

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Jet Melter Furnace	98030093	5/19/1998

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;

- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Die Cast Air Makeup Units
Smelter Air Makeup Units
Boilers - Plant 2
Vertical Drive Tester
Vapor Degreaser

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

Die Cast Machines

7.0 UNIT SPECIFIC CONDITIONS

7.1 Emission Units 01-05: Aluminum Melting Operations

7.1.1 Description

OMC Waukegan has five reverberatory furnaces that are used to hold molten aluminum and melt aluminum ingot and recycled aluminum scrap for use in the die casting operations. The scrap is generated on-site.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Maximum Heat Input (mmBtu/hr)	Emission Control Equipment
01	Certified Reverberatory Furnace	11.0	Afterburner
02	Warwick Dry Hearth Furnace	18.0	None
03	Schaefer Reverberatory Furnace	2.0	None
04	Vacuum Die Cast Reverberatory Furnace	1.1	None
12	Jet Melter Furnace	6.0	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected aluminum melting furnaces" for the purposes of these unit-specific conditions, are the furnaces used for melting aluminum and/or holding molten aluminum, as specified in Condition 7.1.2.
- b. Each affected aluminum melting furnace at the source 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, 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 (See also Attachment 3) [35 IAC 212.321(a)].
- c. Affected aluminum melting furnaces that have rated capacities greater than 10 mmBtu/hr (Emission Units 01 and 02) are subject to 35 IAC 216.121, which requires that:

No person shall cause or allow the emissions of carbon monoxide (CO) into the atmosphere from any

fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

7.1.4 Non-Applicability of Regulations of Concern

- a. Emission Units 03, 04, and 12 are not subject to 35 IAC 216.121 because each furnace has an actual heat input capacity less than 10 mmBtu/hr.
- b. The affected aluminum melting furnaces are not subject to the control requirements of 35 IAC 218.986 because these emission units are exempt pursuant to 35 IAC 218.980(d), which states no limits under Subpart TT shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 2.5 tons per calendar year if the total emissions from such emission units not complying with 35 IAC 218.986 does not exceed 5.0 tons per calendar year.
- c. This permit is issued based on the affected aluminum melting furnaces not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected aluminum melting furnaces either do not use an add-on control device to achieve compliance with an emission limitation or standard or do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.1.5 Control Requirements

- a. The afterburner shall be in operation at all the times when Emission Unit 01 is charged with scrap metal and/or any other metal which has the potential to emit VOM.
- b. The afterburner combustion chamber shall be preheated to an operating temperature of 1800°F before charging, and this temperature shall be maintained during operation. The Permittee may request a revision to this temperature based upon the most recent stack testing results.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected aluminum melting furnaces are subject to the following:

- a. Emissions from the Jet Melter Furnace (Emission Unit 12) shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(lb/hr)</u>	<u>(ton/yr)</u>
PM	4.96	12.75
VOM	0.95	1.22
NO _x	0.60	2.63
CO	0.13	0.55

These limits are based on the maximum process weight rates (See Condition 7.1.7(e)), a maximum firing rate of 6.0 mmBtu/hr, and maximum operating hours (8,760 hr/yr). VOM emissions are based on source tests of similar equipment, PM emissions are based on the maximum allowable emission rate, and other emissions are based on standard AP-42 emission factors.

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). [T1]

The above limitations were established in Permit 98030096, pursuant to 35 IAC Part 203. 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 35 IAC Part 203. Contemporaneous emissions increases and decreases for Permit 98030096 are presented in Tables 6, 7, and 8 (Attachment 1 of this permit). [T1]

7.1.7 Operating and Testing Requirements

- a. All affected aluminum melting furnaces shall only be operated with natural gas as the fuel.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment listed in Condition 7.1.2 such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulation promulgated therein.
- c. Upon request by the Illinois EPA, the Permittee shall conduct emission tests to verify the relationship between the control equipment operating parameters (i.e., afterburner temperature) and control equipment performance.
- d. The Warwick Furnace (Emission Unit 02) shall only be operated as an aluminum holding furnace.

- e. Operation of the Jet Melter Furnace (Emission Unit 12) shall not exceed 7,000 pounds per hour of aluminum (all kinds), 9,000 tons per year of aluminum scrap, and 18,000 tons per year of aluminum scrap and aluminum ingot combined.

7.1.8 Monitoring Requirements

The Permittee shall monitor the following on a continuous basis in order to ensure proper operation of the control equipment:

- a. The afterburner temperature shall be monitored whenever Emission Unit 01 is in operation and is charged with scrap metal and/or any other metal which has the potential to emit VOM.

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 aluminum melting furnace to demonstrate compliance with Conditions 5.5.1 and other applicable requirements, pursuant to Section 39.5(7)(b) of the Act:

- a. Log of afterburner temperature monitoring data;
- b. Process weight rate and production rate (ton/mo and ton/yr);
- c. Amount of aluminum ingot and aluminum scrap processed in the Jet Melter Furnace (ton/mo and ton/yr);
- d. A list of emission factors for affected aluminum melting furnaces that have been tested;
- e. VOM and PM emissions (ton/mo and ton/yr);
- f. Natural gas consumption for each furnace (mmscf/mo and mmscf/yr);
- g. A maintenance and repair log for each control equipment, listing each activity performed with date; and
- h. A list of all emission units to which the Permittee is applying the exclusion of 35 IAC 218.980(d), including:
 - i. Name and identification of each emission unit; and

- ii. Annual VOM emissions from each emission unit, with supporting calculations (tons per calendar year).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviation of an affected aluminum melting furnace or control equipment 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.

7.1.11 Operational Flexibility

N/A

7.1.12 Compliance Procedures

- a. Compliance with the VOM control requirements for Emission Unit 01 shall be determined from the log of continuous temperature monitoring of the afterburner as required by this permit.
- b. Compliance with the PM and VOM emission limits in Conditions 7.1.3(b) and 7.1.6 shall be determined by the recordkeeping required by Condition 7.1.9 and the following equation:

$$\text{Emissions} = \text{Process Weight Rate (ton)} * \text{Emission Factor (Lb/Ton)}$$

The PM and VOM emission factors shall be based on the most recent stack test of the affected aluminum melting furnace or a stack test of a similar aluminum melting furnace. A VOM emission factor of 0.27 lb/ton may be used for the Jet Melter Furnace if the appropriate test data is not available.

- c. Compliance with the CO emission limit in Condition 7.1.3(c) is assured by proper operation of the affected aluminum melting furnaces and the operating limitation in Condition 7.1.7(a).
- d. To determine compliance with Conditions 5.5.1 and 7.1.6, emissions attributable to fuel combustion from the affected aluminum melting furnaces shall be based on the emission factors listed below:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
NO _x	100
CO	84
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion (less than 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement D, March, 1998

Emissions (lb) = (Natural Gas Consumed, ft³) x (The Appropriate Emission Factor)

7.2 Emission Units 05-09: Polishing and Shotblasting Operations

7.2.1 Description

OMC Waukegan uses polishing and shot blasting machines to improve the surface finish of the aluminum castings produced in the die cast facility or received from off-site suppliers. Lathes LB-309, 964, 978, 979, and 981 were constructed prior to 1972; all other emission units were constructed after 1972.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
05	Polishing Line A (5 Lathes: LB-964, 979, 981, 82109, and 83106)	Rotoclone A (Water Scrubber)
06	Polishing Line B (4 Lathes: LB-309, 978, 2108 and 3107)	Rotoclone B (Water Scrubber)
07	Polishing Lathe with Rotoclone (Trim Building)	Rotoclone Trim (Water Scrubber)
08	Polishing Lathe with Handte (Trim Building)	Handte Wet Dust Collector (Water Scrubber)
09	Shot Blasting Operation	Wheelabrator Fabric Filter

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected emission units" for the purposes of these unit-specific conditions, are the polishing and shotblasting operations, as specified in Condition 7.2.2.
- b. Emission Units 05 (LB-82109 and LB-83106 only), 06 (LB-2108 and LB-3107 only), 07 and 08 are 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, 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 (See also Attachment 3) [35 IAC 212.321(a)].

- c. Emission Units 05 (LB-964, 979, and 981 only), 06 (LB-309 and LB-978 only), and 09 are subject to 35 IAC 212.322, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 3) [35 IAC 212.322(a)].

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected emission units (except for the Shot Blasting Operation) not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units (except for the Shot Blasting Operation) do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Control Requirements

- a. The Permittee shall maintain the following pressure drop range continuously in accordance with vendor's recommendation as follows:

<u>Control Device</u>	<u>Pressure Drop Range In Inches Of Water</u>
Rotoclone A	7 to 9
Rotoclone B	7 to 9
Rotoclone Trim	7 to 9
Handte Wet Dust Collector	-----
Wheelabrator Fabric Filter	1 to 3

7.2.6 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.

7.2.7 Operating and Testing Requirements

- a. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment listed in Condition 7.2.2 such that the

pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulation promulgated therein.

- b. Upon request by the Illinois EPA, the Permittee shall conduct emission test to verify the relationship between the control equipment (i.e., pressure drop range for wet scrubber and bag house) operating parameters and control equipment performance.

7.2.8 Monitoring Requirements

The Permittee shall monitor the following in order to ensure proper operation of the control equipment:

- a. On a daily basis, the pressure drop for each Rotoclone and the Wheelabrator fabric filter shall be monitored whenever the affected emission units are in operation.
- b. On a weekly basis, the liquids and solids collected in the Handte Wet Dust Collector shall be removed.

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 emission unit to demonstrate compliance with Conditions 5.5.1 and other applicable requirements, pursuant to Section 39.5(7)(b) of the Act:

- a. Log of daily monitoring data for pressure drop range of Rotoclone A, Rotoclone B, Rotoclone trim, and Wheelabrator fabric filter.
- b. Process weight rate and production rate in ton/mo and ton/yr.
- c. VOM and PM emissions (ton/mo and ton/yr).
- d. A maintenance and repair log for each control equipment, listing each activity performed with date.
- e. Records which demonstrate emission factors and control efficiencies for the affected emission units, if an alternate to the values in Condition 7.2.12 is used.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviation of an affected emission unit and control equipment 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.

7.2.11 Operational Flexibility

N/A

7.2.12 Compliance Procedures

- a. Recordkeeping, monitoring, testing requirements of this Section shall be used to determine compliance with the particulate matter emissions.
- b. Emissions for Emission Units 05-08 shall be determined by using an emission factor of 17 lb of PM/ton of production and 90% control efficiency of control equipment, unless alternate emission factors and control efficiencies have been demonstrated for an individual emission unit.
- c. Emissions for Emission Unit 09 shall be determined by using an emission factor of 17 lb of PM/ton of production and 95% control efficiency of control equipment, unless alternate emission factors and control efficiencies have been demonstrated.

7.3 Emission Units 10-14: Coating Lines

7.3.1 Description

OMC Waukegan manufactures marine engine parts. OMC operates the following coating lines:

Production Paint System
Exhibits Paint Booth and Oven

The production paint system, located in Plant 1 or 2, consists of a 3-stage washer and dry-off oven, prime paint booth and bake oven, and finish paint booth and oven. The paint system is used to paint small engine components and OMC Parts and Accessories products. Metal parts are painted using compliant (high solids) coatings. The same coatings are also typically used to paint plastic parts, although, other coatings can be used.

The exhibits paint booth, located in Plant 2, is used for maintenance painting of equipment used to display OMC products at trade shows. This equipment includes metal motor stands, wood and plastic exhibit panels, and Formica surfaces. Conventional coatings are use in this booth.

The test panel paint booths, located at the Product Development Center, are used to paint test substrates using various types of coatings for engineering evaluation purposes. The painted test panels are subjected to a variety of performance tests (i.e., corrosion, hardness) and then they are destroyed. Primarily compliant (high solids) coatings are used. However, since comparative evaluations are performed, conventional coatings are also used.

The prototype paint booth is used to paint various metal and plastic parts that are engineering prototypes of current and future OMC products. Compliant coatings are primarily used in this booth. However, on occasion, conventional coatings are also used for plastic parts and maintenance painting.

The electrodeposition (E-Coat) coating system, located in Plant 1 or Plant 2, is used to paint cast iron, aluminum and stainless steel parts.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Control Equipment
10	Production Paint System	Prime Booth Filter and Finish Booth Filter
11	Exhibits Paint Booth	Dry Filters

7.3.3 Applicability Provisions and Applicable Regulations

a. An "affected coating line" for the purpose of these unit specific conditions is a coating operation that includes a spray booth or dip tank and drying oven which is used to apply a coating to metal that falls under the category of miscellaneous metal parts and products. As of the "date issued" as shown on page 1 of this permit, the affected coating lines are identified in Condition 7.3.2.

b. The affected coating lines are 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, 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 (See also Attachment 3) [35 IAC 212.321(a)].

d. Each affected coating line, except for Emission Unit 11, is subject to 35 IAC 218.204(j)(5), which provides that:

i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products (Marine Engines). The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>Category</u>	<u>kg/liter</u>	<u>lb/gallon</u>
Air Dried Coatings	0.42	3.5
Baked Primer/Topcoat	0.42	3.5
Baked Corrosion Resistant Basecoat	0.28	2.3

Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

- ii. The VOM content limit applicable to the miscellaneous metal parts coating operation may be complied with on a daily weighted average per line basis [35 IAC 218.205].
- e. Emission Unit 11 is subject to 35 IAC 218.301 which states that 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 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

7.3.4 Non-Applicable Regulations of Concern

- a. Emission Units 10 is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material which excludes coating lines from this requirement.
- b. Emission Unit 11 is not subject to 35 IAC 218.204: Coating Operations because this line is used for maintenance, repair and for trade show exhibit. No product is being manufactured from this line.
- c. Emission Unit 11 is not subject to the control requirements of 35 IAC 218 Subpart TT because pursuant to 35 IAC 218.980(d) no limits under this Subpart shall apply to emission units with emission of VOM to the atmosphere less than or equal to 2.5 tons per calendar year if the total emissions from such emission units not complying with 35 IAC 218.986 does not exceed 5.0 tons per calendar year.
- d. This permit is issued based on the affected coating lines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating lines does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.3.5 Operational and Production Limits and Work Practices

- a. Each affected coating line drying oven shall only be operated with natural gas as the fuel.
- b. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section. For this purpose,

the pressure drop across the filter shall be an indicator of when a filter needs to be replaced.

- c. An adequate inventory of spare filters shall be maintained.
- d. No product from Emission Units 11 and 12 shall be sold in the market.

7.3.6 Emission Limitations

In addition to Condition 5.2.2, the source-wide limitations in Condition 5.5, and the VOM content limitations of Condition 7.3.3, the affected coating lines are subject to the following limitations:

- a. These limitations were established in Permit 94030059, which addressed spray painting emission units. These limits ensure that 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 35 IAC Part 203. Permit 94030059 was issued based upon a contemporaneous and creditable decrease in VOM emissions so that the net increase in VOM emissions is not significant. The accounting of contemporaneous emissions increases and decrease is shown in Tables 1 and 2 (Attachment 1 of this permit). The decrease in emissions was created by elimination of solvent cleaning of castings, which allowed the permanent shutdown of a conveyerized vapor degreaser (JM5743). [T1]
- i. Emissions and operation of the coating operations not regulated by 35 Ill. Adm. Code 218 Subpart F, including the coating of plastic parts, shall not exceed the following limits:

Material	VOM		VOM		
	Content (lb/gal)	Material Usage (gal/wk)	Usage (gal/yr)	Emission (lb/wk)	(T/yr)
Conventional Coating	6.0	75	975	450	2.93
Lower VOM Coating	4.3	-	-	-	-
Non-metal Parts Coatings Subtotal		138.5	1,800	723	4.70
All Coatings Total		607.7	7,900	2,365	15.38

These limits are based on the VOM content limits in Condition 7.3.3(d) and the material usage limits above.

The above limits allow flexibility for the usage of the lower VOM coating. Since the lower VOM coating has no usage or emission limits, usage of the lower VOM coating is limited by the subtotal of the two coating types.

The above limits also allow flexibility for the usage of the metal parts coating. Since the metal parts coating has no usage or emission limits, usage of metal parts coatings is limited by the limitations on the plant wide coatings total. Note that the total VOM emission from all coatings for Emission Units 10-11 is 15.38 tons/yr, not 15.38 tons/yr + 4.70 tons/yr.

- ii. Emissions and operation of the cleaning solvents used in the coating operations shall not exceed the following limits:

	VOM Content (lb/gal)	Material Usage (gal/wk)		VOM Emissions (lb/wk)	(T/yr)
Cleaning Solvent	7.5	323.1	4,200	1,341	8.72

These limits are based on maximum operating conditions and material balance. Cleaning solvent emissions are calculated by assuming the VOM emission is equal to the amount used minus the amount recovered and shipped off site.

- iii. Compliance with annual limits shall be determined from a running total of 52 weeks of data. [T1]

7.3.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected coating line shall be determined according to USEPA Reference Methods 24

and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208 and 218.211(a).

- b. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);
- c. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.3.9(b) directly reflect the application of such material and separately account for any additions of solvent [35 IAC 218.105(a), 218.208, and 218.211(a)].

7.3.8 Inspection Requirements

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

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 5.5.1, 7.3.3 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall collect and maintain records of the following information each day for each affected coating line subject to 35 IAC 218.204, pursuant to 35 IAC 218.211(c):
 - i. The name and identification number of each coating as applied on each affected coating line.
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected coating line.
- b. Records of the testing of VOM and HAP content (in wt. %) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:

- i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- c. The operating schedule of the affected coating line.
- d. Results of filter inspections and dates of replacements.
- e. On days when a coating line uses daily-weighted average as defined in 35 IAC 218.205 for compliance with 35 IAC Part 218, Subpart F, the following records shall be kept for that line in addition to the records required by 7.3.9(a) and (b), pursuant to 35 IAC 218.211(d):
 - i. The volume of each coating as applied each day on each affected coating line.
 - ii. The daily-weighted average VOM content of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on each coating line.
- f. The Permittee shall maintain a record of the VOM content of each coating material and each cleaning material, in lb VOM/gallon. This record shall be kept current.
- g. The Permittee shall collect and record all of the following information:
 - i. The gallons of each coating and cleaning solvent used per week and per year. For the metal parts coating totals, the water and exempted compounds may be subtracted out to determine the total gallons of coating used.
 - ii. VOM emissions per week and per year. VOM emissions shall be calculated assuming 100% evaporation of the VOM in the material used.
 - iii. VOM content of cleaning solvents used.
 - iv. The gallons of cleaning solvent shipped off site and the corresponding VOM content of this solvent.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviation of an affected coating line with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.3.3(c) (see also 35 IAC 218.204(j)) within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

In addition to the general operational flexibility in Conditions 5.8 and 8.4, the Permittee is authorized to make the following physical or operational change with respect to the affected coating lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.3.7, the source wide emission limitations in Condition 5.5.1 and any other limitations of this permit are not exceeded and the affected coating line remains in compliance with Conditions of this permit.

7.3.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in Condition 7.3.3(b) is assured and achieved by the proper operation and maintenance of the filters as required by Condition 7.3.5(b) and the work-practices inherent in the operation of an affected coating line.
- b. Compliance of each coating with the VOM content limitations in Condition 7.3.3(c) shall be based on the recordkeeping requirements in Condition 7.3.9 and by the use of either testing as required in Condition 7.3.7 or by use of the formulae listed below:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D]$$

Where:

V = Percent VOM in the Coating (%)

D = Overall Coating Density (lb/gal)

$W = G \sum (w_i/d_i)$

Where:

w_i = Percent Exempt Compound i in the Coating

d_i = Overall Density of Exempt Compound i , in lb/gal

and the summation is applied over water and all exempt compounds i , in the coating.

- c. Compliance with the VOM emission limitations in Conditions 5.5.1 and 7.3.6 shall be determined from the recordkeeping and testing required by this section and the following equation:

VOM Emissions (lb) = Coating Usage (gal) * Coating Density (lb/gal) * VOM Content of Coating (wt. %) + Solvent/Thinner Usage (gal) * VOM Content of Solvent/Thinner (wt. %) * Solvent/Thinner Density (lb/gal).

7.4 Emission Units 15-20: Boilers and Air Make-up Units

7.4.1 Description

Natural gas fired boilers and air make up units are operated at this source. These fuel combustion emission units are used for comfort and process heating.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Maximum Heat Input (mmBtu/hr)
15	Plant 2 West Boiler Room (2 Boilers)	Each at 22.3
16	Plant 2 North Boiler Room (2 Boilers)	1 at 25.2 and 1 at 31.4
18	Smelter Building Air Make-up Units (2 Units)	Each at 9
19	Die Cast Building Air Make-up Units (12 Burners)	Each at 19.26
20	Trim Building Air Make-up Units (2 Units)	Each at 8.64

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected fuel combustion emission unit" for the purpose of these unit specific conditions, is each boiler or air make up unit listed in Condition 7.4.2.
- b. Each affected fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) (i.e., Emission Units 15-16 and 19) is subject to 35 IAC 216.121, which specifies that no person shall cause or allow the emission of carbon monoxide into the atmosphere to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- c. Emission Unit 16 is subject to NSPS, 40 CFR 60 Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units because each boiler was constructed after the applicable date of June 9, 1989, and each boiler has a design heat input greater than 10 mmBtu/hr.

7.4.4 Non-Applicability of Regulations of Concern

- a. Emission Units 15 and 18-20 are not subject to NSPS, 40 CFR 60 Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating unit was constructed, modified, or reconstructed prior to June 9, 1989 which is the applicability date for this regulation.

- b. Emission Units 18 and 20 are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Sources, since the actual heat input from each emission unit is less than 2.9 MW (10 mmBtu/hr).
- c. The affected fuel combustion emission units are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr).
- d. The affected fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.303, Fuel Combustion Emission Sources, which excludes fuel combustion emission units from this requirement.
- e. This permit is issued based on the affected fuel combustion emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected fuel combustion emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected fuel combustion emission units.

7.4.6 Emission Limitations

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

- a. Emissions and operation from Emission Unit 16 shall not exceed the following limits:

		Gas Consumption					
		<u>(ft³/mo)</u>		<u>(ft³/yr)</u>			
		41.33 x 10 ⁶		4.96 x 10 ⁸			
VOM		PM		NO _x		CO	
<u>(T/mo)(T/yr)</u>		<u>(T/mo)(T/yr)</u>		<u>(T/mo)(T/yr)</u>		<u>(T/mo)(T/yr)</u>	
0.06	0.7	0.3	3.48	2.9	34.7	0.73	8.7

These limits are based on maximum natural gas consumption and standard AP-42 emission factors.

Compliance with annual limits shall be determined from a running total of 12 months of data. [T1]

The above limitations were established in Permit 97060070, 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]

- b. Emissions and operation of Emission Units 18-20 shall not exceed the following limits:

Emission Unit	Firing Rate	NO _x Emissions	
	(per unit) (mmBtu/hr)	(per unit) (Lb/Hr)	(T/Yr)
18	9.02	0.9	3.02
19	19.26	2.7	9.07
20	8.64	0.86	2.9
Total			120.68

Emission Unit	CO Emissions		PM Emissions	
	(per unit) (Lb/Hr)	(T/Yr)	(per unit) (Lb/Hr)	(T/Yr)
18	0.19	0.64	-	-
19	0.67	2.25	0.26	0.87
20	0.18	0.6	-	----
Total		29.48		10.44

These limits are based on maximum natural gas consumption and standard AP-42 emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data. [T1]

The above limitations were established in Permit 94050095, 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]

7.4.7 Testing Requirements

None

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 fuel combustion emission units to demonstrate compliance with Condition 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

- a. Fuel usage (ft³/mo and ft³/yr) for Emission Units 16 and 18-20 individually and all boilers and air make-up units combined.
- b. VOM, PM, NO_x, and CO emission from Emission Units 16 and 18-20 individually and all boilers and air makeup units combined.
- c. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.4.12 (ton/mo and ton/yr).
- d. All the records required pursuant to 40 CFR 60.7 and 60.48c for Emission Unit 16.

7.4.10 Reporting Requirements

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3 is assumed to be achieved by the work practices inherent in operation of each affected boiler, thus no compliance procedures are set in this permit addressing this regulation.
- b. To determine compliance with Conditions 5.5.1 and 7.4.6, emissions from the affected fuel combustion emission units shall be based on the emission factors listed below:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
NO _x	100
CO	84
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion (less than 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement D, March, 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, ft³) x
(The Appropriate Emission Factor)

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 March 23, 1999 (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].

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	April 1

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

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

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1: Tables indicating contemporaneous increases and decreases

Table 1

Net VOM emissions increase determination from Operating Permit 94030059 (issued on 3/21/1995).

<u>Project</u>	<u>VOM Emissions (tons/year)</u>
1. Maximum potential emission increases	
A. New sources in this application:	
Coating Operation	24.10
Production Paint Air Make-up	<u>0.09</u>
Subtotal	24.19
B. Other Outstanding Applications:	
Aluminum Heat Treat System Feb - 94	0.01
Heated Die Cleaning Tank Feb - 94	<u>0.04</u>
Subtotal	<u>0.05</u>
C. Previously issued Permits:	
Electrocoat Coating Line Mar - 91	6.09
D. Permit Exempt Sources:	
Die Cast Holding Furnaces Jul - 89	0.42
Service School Engine Testing Jul - 94	0.55
Engine Testing Cooling Tower Jan - 94	<u>2.57</u>
Subtotal	3.54
2. Emissions Decreases	
A. ConveyORIZED Vapor Degreaser (see Table 2)	34.2
3. Five Year Net Emissions Increase	0.0

Table 2

VOM emission decrease determination from Operating Permit 94030059 (issued on 3/21/1995).

Trichloroethylene usage and VOM emissions from contemporaneous shutdown of conveyORIZED vapor degreaser (JM5743):

<u>Year</u>	<u>Trichloroethylene Usage (gallon/year)</u>	<u>VOM Emissions (ton/year)</u>
1990	5,130	27.9
1991	7,309	40.5
1992	0	0
1993	0	0
1994	0	0

Vapor degreaser contemporaneous decrease in emissions.

$$(40.5 + 27.9) \div 2 = 34.2 \text{ tons VOM/year}$$

Table 3

VOM emission increase determination from Construction Permit 95120309 (issued on 6/14/1996).

Total combined VOM emission increase from the plant during contemporaneous period:

Description	Permit <u>Number</u>	Date <u>Issued</u>	VOM Emissions <u>TPY</u>
Electrocoat Coating Line	90100017	Mar, 91	6.09
Aluminum Heat Treat Furnace	94020028	Apr, 94	0.04
Heated Die Cleaning Tank	94020027	Apr, 94	0.04
Spray Paint Systems	94030059	Sep, 94	24.20
Flywheel Heat Treat Process	95010055	Mar, 95	2.10
Vacuum Die Cast Furnace	95040071	Jun, 95	0.02
Certified Reverberatory Furnace	95090176	Jan, 96	0.03
Test Tank Development Equipment	96040067	Apr, 96	<u>0.27</u>
		Total	32.79

Table 4

VOM emission decrease determination from Construction Permit 95120309 (issued on 6/14/1996).

Trichloroethylene usage and VOM emissions from contemporaneous shutdown of conveyorized vapor degreaser (JM5743):

<u>Year</u>	<u>Trichloroethylene Usage (gallon/year)</u>	<u>VOM Emissions (ton/year)</u>
1990	5,130	27.9
1991	7,309	40.5
1992	0	0
1993	0	0
1994	0	0

Vapor degreaser contemporaneous creditable decrease in emissions.
 $(40.5 + 27.9) + 2 = 34.2$ tons VOM/year

Table 5

Net VOM emission increase determination from Construction Permit 95120309 (issued on 6/14/1996).

Total VOM emissions increase during the contemporaneous period including this project (see Table 3)

$$\begin{aligned} &= (32.79 + 21.55) \text{ TPY} \\ &= 54.34 \text{ TPY} \end{aligned}$$

Total VOM emissions decrease during the contemporaneous period (see Table 4)

$$= 34.2 \text{ TPY}$$

Total VOM increase during the contemporaneous period

$$\begin{aligned} &= (54.34 - 34.2) \text{ TPY} \\ &= 20.14 \text{ TPY} \end{aligned}$$

Note: This table indicates a net increase of VOM emissions of less than 25 tons over 5 consecutive years including VOM from proposed project. This project also does not result in an increase of 25 tons or more of VOM by itself. The VOM emissions decrease is due to voluntary shutdown of conveyORIZED vapor degreasers.

Table 6

Total combined VOM emissions increases from the plant during contemporaneous period from Joint Construction and Operating Permit 98030096 (issued on 5/19/1998).

<u>Description</u>	<u>Permit Number</u>	<u>Date Issued</u>	<u>VOM Emissions (TPY)</u>
Aluminum Heat Treat Furnace	94020028	April, 1994	0.04
Heated Die Cleaning Tank	94020027	April, 1994	0.04
Spray Paint Systems	94030059	Sept., 1994	24.20
Flywheel Heat Treat Process	95010055	March, 1995	2.10
Vacuum Die Cast Furnace	95040071	June, 1995	0.02
Certified Reverberatory Furnace	95090176	Jan., 1996	0.03
Test Tank Development Equipment	96040067	April, 1996	0.27
Certified Testing Engines	95120309	June, 1996	21.55
Boilers	97060070	June, 1997	0.70
Gasoline Storage Tank	97100008	Oct., 1997	0.44
Jet Melter Furnace	98030096	May, 1998	1.22
Warwick Holding Furnace	75090032	May, 1998	0.10
		Total	50.71

Table 7

Total combined VOM emissions decrease from the plant during contemporaneous period from Joint Construction and Operating Permit 98030096 (issued on 5/19/1998).

<u>Description</u>	<u>Permit Number</u>	<u>Date Issued</u>	<u>VOM Emissions (TPY)</u>
Conveyorized Vapor Degreaser*	73040441	Dec., 1993	34.2
Warwick and Moroney Melting Furnaces	75090032, 75090075	May, 1998	<u>4.9</u>
		Total	39.1

* Actual emissions are based on the average rate during the two-year period which is representative of normal source operation (1990 and 1991).

Table 8

Net VOM emission increase determination from Joint Construction and Operating Permit 98030096 (issued on 5/19/1998).

Total VOM increase during the contemporaneous period
= (50.71 - 39.10) TPY
= 11.61 TPY

Note: This table indicates a net increase of VOM emissions of less than 25 tons over 5 consecutive years including VOM from proposed project. This project also does not result in an increase of 25 tons or more of VOM by itself. The VOM emissions decrease is due to voluntary shutdown of conveyORIZED vapor degreasers and Moroney and Warwick aluminum melting operations.

Table 9

Total combined VOM emissions increase from the plant during contemporaneous period from Joint Construction and Operating Permit 98030043 (issued on 6/8/1998).

<u>Description</u>	<u>Permit Number</u>	<u>Date Issued</u>	<u>VOM Emissions (TPY)</u>
Aluminum Heat Treat Furnace	94020028	April, 1994	0.04
Heated Die Cleaning Tank	94020027	April, 1994	0.04
Spray Paint Systems	94030059	Sept., 1994	24.20
Flywheel Heat Treat Process	95010055	March, 1995	2.10
Vacuum Die Cast Furnace	95040071	June, 1995	0.02
Certified Reverberatory Furnace	95090176	Jan., 1996	0.03
Test Tank Development Equipment	96040067	April, 1996	0.27
Certified Testing Engines	95120309	June, 1996	21.55
Training Center Testing Engines	95120310	June, 1996	0.82
Boilers	97060070	June, 1997	0.70
Gasoline Storage Tank	97100008	Oct., 1997	0.44
Jet Melter Furnace	98030096	May, 1998	1.22
Warwick Holding Furnace	75090032	May, 1998	0.10
Boat Engineering Spray Booth	98030043	June, 1998	<u>1.00</u>
		Total	52.53

Table 10

Total combined VOM emissions decrease from the plant during contemporaneous period from Joint Construction and Operating Permit 98030043 (issued on 6/8/1998).

<u>Description</u>	<u>Permit Number</u>	<u>Date Issued</u>	<u>VOM Emissions (TPY)</u>
Conveyorized Vapor Degreaser*	73040441	Dec., 1993	34.2
Warwick and Moroney Melting Furnaces	75090032, 75090075	May, 1998	<u>4.9</u>
		Total	39.1

* Actual emissions are based on the average rate during the two-year period which is representative of normal source operation (1990 and 1991).

Table 11

Net VOM emission increase determination from Joint Construction and Operating Permit 98030043.

Total VOM increase during the contemporaneous period
= (52.53 - 39.10) TPY
= 13.43 TPY

Note: This table indicates a net increase of VOM emissions of less than 25 tons over 5 consecutive years including VOM from proposed project. This project also does not result in an increase of 25 tons or more of VOM by itself. The VOM emissions decrease is due to voluntary shutdown of conveyORIZED vapor degreasers and Moroney and Warwick aluminum melting operations.

10.2 Attachment 2: Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3: Particulate Matter Emissions from Process Emission Units

10.3.1 Section 212.321 - Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

- a. Except as further provided in 35 IAC Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

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

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

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

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

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

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

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

Where:

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

10.3.2 Section 212.322 - Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972

- a. Except as further provided in 35 IAC Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.

- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

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

1. For process weight rates up to 27.2 Mg/hr (30 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

2. For process weight rates in excess or 27.2 Mg/hr (30 Ton/hr):

	Metric	English
P	Mg/hr	Ton/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

- c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972

Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lbs/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.	8.7	10.00	19.20
13.	11.1	15.00	25.20
18.	13.8	20.00	30.50
23.	16.2	25.00	35.40

Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lbs/hr
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Where:

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

10.4 Attachment 4: Adjusted Standard for Die Cast Operation

The following is a summary of the requirements for the die cast operation included in the insignificant activity list in Condition 3.1.3. Refer to Adjusted Standard 94-3, date issued December 7, 1995, for the complete text of this adjusted standard.

a. Operating Requirements

The Permittee shall use die lubricants, plunger lubricants, and anti solder pastes which meet the following requirements:

- i. Die lubricants shall be water soluble; however, a de minimis amount of solvent-dispersed die lubricants shall be allowed if total annual usage of the solvent dispersed die lubricant does not exceed 119 gal/yr; and
- ii. Plunger lubricants and anti-solder pastes with organic materials shall have vapor pressures less than 0.1 psia at 21EC (70EF).

b. Testing Requirements

- i. Upon request by the Illinois EPA, the Permittee, at its own expense, shall conduct sampling and analysis to demonstrate compliance with this adjusted standard.
- ii. Sampling and analysis to demonstrate compliance with this adjusted standard shall:
 - A. For water soluble die lubricants, be conducted in accordance with the applicable test methods and procedures specified in test method ASTM D4017-81 (1987), as incorporated by reference in 35 IAC 218.112(a)(13). Organic material content shall be considered to be all material not identified as water pursuant to this test method.
 - B. For plunger lubricants and anti-solder pastes, be conducted in accordance with the applicable vapor pressure test methods and procedures specified in 35 IAC 218.110.
- iii. Nothing in this adjusted standard shall limit the authority of USEPA pursuant to the Clean Air Act, as amended, to require testing or shall affect the authority of USEPA under Section 114 of the Clean Air Act. 42 U.S.C. 7414 (1990).

c. Recordkeeping Requirements

The Permittee shall collect and record all of the following information and shall retain such records at the source for the most recent consecutive three-year period, or such longer period as may be required by this permit. These records shall be made available immediately to the Illinois EPA upon request.

i. The Permittee shall collect and record all of the following information:

A. For water soluble die lubricants, daily records shall be maintained evidencing the following:

1. The name and manufacturer of each water soluble die lubricant used at the source;
2. The organic content of each water soluble die lubricant by weight, as applied, and the volume of each water soluble die lubricant used; and
3. A copy of the Material Safety Data Sheets for each water soluble die lubricant used in the marine engine die casting operation.

B. For plunger lubricants and anti-solder paste, monthly records shall be maintained evidencing the following:

1. The name and manufacturer of each plunger lubricant and anti-solder paste used at the source on a monthly basis;
2. Vapor pressure of each plunger lubricant and anti-solder paste used at the source; and
3. Material Safety Data Sheets for each plunger lubricant and anti-solder paste used at the source. The Material Safety Data Sheets shall include the vapor pressure of each material.

C. For solvent-dispersed die lubricants, daily records shall be maintained evidencing the following:

1. The name and manufacturer of each solvent-dispersed die lubricant used at the source; and

2. Total volume of all solvent-dispersed die lubricants and associated solvent thinner used each day with the date, time and amount of solvent thinner added to the solvent-dispersed die lubricant; and
3. Annual usage of all solvent-dispersed die lubricants and associated solvent thinner, determined as a running total of usage data; and
4. Material Safety Data Sheets for each solvent-dispersed lubricant used at the source.

d. Reporting Requirements

i. The Permittee shall:

- A. Notify the Illinois EPA within 30 days after a violation of the requirements of this adjusted standard. Such notification shall include a copy of any records of such violation; and
- B. Notify the Illinois EPA at least 30 calendar days before changing the method of compliance with this adjusted standard; and

ii. The Permittee shall notify the Illinois EPA in writing within 30 days whenever the usage of solvent-dispersed die lubricants exceeds 55 gallons within a calendar year. The notification shall include all applicable records required to be maintained pursuant to this adjusted standard, and shall include a plan to ensure future compliance with the requirements of this adjusted standard.

10.5 Attachment 5 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. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
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;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

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, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT 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
- 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:	
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.

10.7 Attachment 7 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 renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. 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.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. 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. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. 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 fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

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

Page 3

Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506