FINAL DRAFT/PROPOSED CAAPP PERMIT
Palex Container Systems
I.D. No.: 031600ASD
Application No.: 95120305
February 2, 2000

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Palex Container Systems
Attn: Samuel Fiegura
2300 West 13th Street
Chicago, Illinois 60608

Application No.: 95120305 I.D. No.: 031600ASD
Applicant's Designation: Date Received: December 27,1995
Operation of: Reconditioned Steel Containers
Date Issued: Expiration Date[2]:
Source Location: 2300 West 13th Street, Chicago, Cook County
Responsible Official: Samuel Fiegura

This permit is hereby granted to the above-designated Permittee to operate a Steel Drum Reconditioning facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:RWB:psj

cc: Illinois EPA, FOS, Region 1
USEPA
J. Armitage, Illinois EPA, DLC
K. Patel, Illinois EPA, CASM

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

[2] Except as provided in condition 8.7 of this permit.

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10.0 ATTACHMENTS

1.0 SOURCE IDENTIFICATION

1.1 Source

Palex Container Systesm
2300 West 13th Street
Chicago, Illinois 60608
(312) 829-3838

I.D. No.: 031600ASD
Standard Industrial Classification: 7699, Service Sector

1.2 Owner/Parent Company

Palex Container Systems
6829 Flintlock Road
Houston, Texas 77040

1.3 Operator

Palex Container Systems
2300 West 13th Street
Chicago, Illinois 60608

Timothy L. Cullina
(312) 829-3838

1.4 General Source Description

Palex Container Systems (formerly Acme Barrel Company) is located at 2300 West 13th Street, Chicago in Cook County. The source reconditions and recycles industrial shipping containers. Coatings are used to provide a durable, protective finish that resist weathering, abrasion, impacts, and in the case of interior linings, provide chemical resistance to the contents of the container. The drums are cleaned to remove residue either in drum furnaces or by using an alkaline solution. The method chosen depends on the residue material and type of drum. The drums are then shot blasted to complete the cleaning process and then are coated. The source has ten coating booths, five for interior coatings, and five for exterior coatings. After the coating operation is complete, the finished drums have cover gaskets glued onto the covers.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	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 F), 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
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft^3	cubic foot
gal	gallon
HAP	Hazardous Air Pollutants
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mft^3	Million cubic feet
Mg	Metric Tonnes or Megagrams
mmBtu	Million Btus
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration

RMP	Risk Management Plan
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
T	Ton
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
Wt	Weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

None

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

Drying Oven

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:

None

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
SB-1	Interior Coating Line for drums first coat (Coating Booth SB-1)	Before 1973	Filter F-SB-1
SB-2	Interior Coating Line for drums first coat (Coating Booth SB-2)	Before 1973	Filter F-SB-2
SB-3	Interior Coating Line for drums second coat (Coating Booth SB-3)	Before 1973	Filter F-SB-3
SB-4	Interior Coating Line for drums clear coat (Coating Booth SB-4)	Before 1973	Filter F-SB-4
SB-5	Exterior Coating Line for open head drums (Coating Booth SB-5)	Before 1973	Filter F-SB-5
SB-6	Interior Coating Line for lids (Coating Booth SB-6)	Before 1973	Filter F-SB-6
SB-7	Exterior Coating Line for lids (Coating Booth SB-7)	Before 1973	Filter F-SB-7
SB-T	Exterior Coating line for tight head drums (Coating Booth SB-T)	Before 1973	Filter F-SB-T
CB-R	Ring Dip Coating Line (Coating Booth CB-R)	Before 1973	None
SB-NS	Exterior Coating Line for open head drums (Coating Booth SB-NS)	Before 1973	Filter F-SB-NS
OV-D	Gas Fired Oven for drying water off inside and outside of drums (Drying Oven OV-D)	Before 1973	None
OV-E	Gas Fired Oven for drying coated metal parts in line with coating booths SB-5, SB-7 & SB-NS (Drying Oven OV-E)	Before 1973	None
OV-F	Gas Fired Oven for drying coated metal parts in line with coating booths SB-1 & SB-2 (Flash Off Oven OV-F)	Before 1973	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
OV-I	Gas Fired Oven for drying coated metal parts in line with coating booths SB-1, SB-2, SB-3, SB-4,& SB-6 (Drying Oven OV-I)	Before 1973	None
OV-R	Gas Fired Oven for drying coated metal parts in line with coating booth CB-R (Drying Oven OV-R)	Before 1973	None
OV-T	Gas Fired Oven for drying coated metal parts in line with coating booth SB-T (Drying Oven OV-T)	Before 1973	None
GA	Cover Gasket Gluing (Gluing Line GA)	Before 1973	None
OX-W	Natural Gas or #2 oil fired drum cleaning furnace (Drum Furnace OX-W)	Before 1973	Afterburner AB-W
OX-E	Natural Gas fired drum cleaning furnace (Drum Furnace OX-E)	Before 1973	Afterburner AB-E
OX-LP	Natural Gas fired lid/pail cleaning furnace (Lid/Pail Furnace OX-LP)	Before 1973	Afterburner AB-LP
BL-5O	Shot Blasting to remove scales (Shot Blaster L-5O)	Before 1973	Baghouse BG-5O
BL-5L	Shot Blasting to remove scales (Shot Blaster BL-5L)	Before 1973	Baghouse BG-5L
BL-PG	Shot Blasting to remove scales (Shot Blaster BL-PG)	Before 1973	Baghouse BG-5L
BL-PT	Shot Blasting to remove scales (Shot Blaster BL-PT)	Before 1973	Baghouse BG-PT
BL-3O	Shot Blasting to remove scales (Shot Blaster BL-3O)	Before 1973	Baghouse BG-3O
SBL-3L	Shot Blasting to remove scales (Shot Blaster BL-3L)	Before 1973	Baghouse BG-3L
BL-5T	Shot Blasting to remove scales (Shot Blaster BL-5T)	Before 1973	Baghouse BG-5T
SW-S	Cleaning drum interiors for reconditioning (Alkaline Washer SW-S)	Before 1973	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
SW-P	Cleaning drum interiors for reconditioning (Alkaline Washer SW-P)	Before 1973	None
SW-NS	Cleaning drum interiors for reconditioning (Alkaline Washer SW-NS)	Before 1973	None
AB-1	Acid bath to remove rust (Acid Bath AB-1)	Before 1973	None
Boiler	Natural gas-fired boiler Maximum heat input capacity: 25.2 mmBtu/hr	Before 1973	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 and HAP emissions.

5.2 Applicable Regulations

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

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

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

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

b. The emission of smoke or other particulate matter from any emission unit shall not exceed an opacity of greater than 30 percent, except that an opacity of greater than 30 percent but less than 60 percent shall be allowed for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 feet) radius from the center point of any other such emission unit owned or operated by the Permittee, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period, pursuant to 35 IAC 212.123 and 212.124.

5.2.4 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

a. This stationary source, as defined in 40 CFR Section 68.3, is subject to 40 CFR Part 68, the Accidental Release Prevention regulations [40 CFR 68.215(a)(1)].

b. The owner or operator of a stationary source shall revise and update the RMP submitted, as specified in 40 CFR 68.190.

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.

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO_x)	6.6
Particulate Matter (PM)	4.39
Sulfur Dioxide (SO_2)	6.06
Volatile Organic Material (VOM)	254.2
HAP, not included in VOM or PM	----
TOTAL	271.25

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section

502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Natural Gas Usage

The Permittee shall maintain records of the following items for the units which combust natural gas so as to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. Natural gas usage of the source, Mft^3/mo and Mft^3/yr; and

b. Records of the monthly and aggregate annual NO_x, PM, SO_2, and VOM emissions from the combustion of natural gas at the source shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

5.6.3 Records for Distillate Fuel Oil Usage

The Permittee shall maintain records of the following items for the units which combust natural gas so as to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. Distillate fuel oil usage of the source, gal/mo and gal/yr; and

b. Records of the monthly and aggregate annual NO_x, PM, SO_2, and VOM emissions from the combustion of distillate fuel oil at the source shall be

maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Fuel Combustion Emissions

a. To determine compliance with Condition 5.5.1, emissions from the combustion of natural gas at the source shall be calculated based on the following emission factors:

Pollutant	Emission Factor ($lb/10^6$ ft^3)
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

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

Natural Gas Combustion Emissions (lb) = (Natural Gas Consumed, Mft^3) x (The Appropriate Emission Factor, lb/Mft^3)

b. To determine compliance with Condition 5.5.1, emissions from the combustion of No. 2 fuel oil at the source shall be calculated based on the following emission factors:

Pollutant	Distillate Fuel Oil Emission Factor (lb/1000 gal)
NO_x	20
PM	2
SO_2	142 S
VOM	0.34

These are the emission factors for uncontrolled distillate fuel oil combustion (< 100 mmBtu/hr), Tables 1.3-1 and 1.3-3, AP-42, Volume I, Fifth Edition, Supplement D, September, 1998. S indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Fuel Oil Combustion Emissions (lb) = (Distillate Fuel Oil Consumed, gal)x (The Appropriate Emission Factor, lb/1000 gal)

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 October 31 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 862 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 97.9130 tons per season.

This determination includes the use of 1996 and 1997 as baseline seasons. This determination includes use of the 1997 season as a substitute for the 1994 and 1995 seasons due to non-representative conditions in this season as allowed by 35 IAC 205.320(a).

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

Not applicable.

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 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 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)]:

Natural Gas Combustion Units

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)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Units SB, OV, CB Coating Lines #1 - #8
Controls F-SB Filters

7.1.1 Description

After preliminary cleaning operation, the coating of steel drums are conducted with paint spray booths and bake (drying) ovens.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
SB-1	Interior Coating Line for drums first coat (Coating Booth SB-1)	Filter F-SB-1
SB-2	Interior Coating Line for drums first coat (Coating Booth SB-2)	Filter F-SB-2
SB-3	Interior Coating Line for drums second coat (Coating Booth SB-3)	Filter F-SB-3
SB-4	Interior Coating Line for drums clear coat (Coating Booth SB-4)	Filter F-SB-4
SB-5	Exterior Coating Line for open head drums (Coating Booth SB-5)	Filter F-SB-5
SB-6	Interior Coating Line for lids (Coating Booth SB-6)	Filter F-SB-6
SB-7	Exterior Coating Line for lids (Coating Booth SB-7)	Filter F-SB-7
SB-T	Exterior Coating line for tight head drums (Coating Booth SB-T)	Filter F-SB-T
CB-R	Ring Dip Coating Line (Coating Booth CB-R)	None
SB-NS	Exterior Coating Line for open head drums (Coating Booth SB-NS)	Filter F-SB-NS
OV-D	Gas Fired Oven for drying water off inside and outside of drums (Drying Oven OV-D)	None
OV-E	Gas Fired Oven for drying coated metal parts in line with coating booths SB-5, SB-7 & SB-NS (Drying Oven OV-E)	None

Emission Unit	Description	Emission Control Equipment
OV-F	Gas Fired Oven for drying coated metal parts in line with coating booths SB-1 & SB-2 (Flash Off Oven OV-F)	None
OV-I	Gas Fired Oven for drying coated metal parts in line with coating booths SB-1, SB-2, SB-3, SB-4,& SB-6 (Drying Oven OV-I)	None
OV-R	Gas Fired Oven for drying coated metal parts in line with coating booth CB-R (Drying Oven OV-R)	None
OV-T	Gas Fired Oven for drying coated metal parts in line with coating booth SB-T (Drying Oven OV-T)	None

7.1.3 Applicability Provisions and Applicable Regulations

a. Coating Lines #1 through #8 are “affected coating lines” for the purpose of these unit-specific conditions.

b. Each affected coating line is subject to the emission limits identified in Condition 5.2.2.

c. The affected coating lines listed in the table under Condition 7.1.3(c)(ii) are subject to 35 IAC 212.321(a), which provides that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

ii. The expected process weight rates for each affected fermentation manufacturing units and

the allowable PM emission rates for each affected fermentation manufacturing units set by 35 IAC 212.321 are as follows:

Emission Unit(s)	Process Weight Rate (lb/hr)	Allowable PM Emissions (lb/hr)
Coating Booth (SB-1)	≤ 100.0	0.55
Coating Booth (SB-2)	≤ 100.0	0.55
Coating Booth (SB-3)	≤ 100.0	0.55
Coating Booth (SB-4)	≤ 100.0	0.55
Coating Booth (SB-5)	175.0	0.69
Coating Booth (SB-6)	≤ 100.0	0.55
Coating Booth (SB-7)	≤ 100.0	0.55
Coating Booth (SB-NS)	≤ 100.0	0.55
Coating Booth (SB-T)	260.0	0.85
Coating Booth (CB-R)	≤ 100.0	0.55
Drying Oven (OV-D)	≤ 100.0	0.55
External Oven (OV-E)	7,320.0	5.08
Flash Off Oven (OV-F)	7,200.0	5.03
Internal Oven (OV-I)	7,320.0	5.08
Ring Oven (OV-R)	≤ 100.0	0.55
Tight Head Oven (OV-T)	11,660.0	6.51

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

e. Pursuant to 35 IAC 218.204, except as provided in Condition 7.1.3(f) (see also 35 IAC 218.205), no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. 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, except where noted. 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. The emission limitations are as follows:

i. Miscellaneous Metal Parts and Products Coating/Extreme Performance Coating Baked [35 IAC 218.204(j)(2)(B)]:

kg/l	lb/gal
0.40	3.3

ii. Miscellaneous Metal Parts and Products Coatings/Steel Pail and Drum Interior Coating [35 IAC 218.204(j)(3)]:

kg/l	lb/gal
0.52	4.3

f. Pursuant to 35 IAC 218.205(b), no owner or operator of a coating line subject to the limitations of Condition 7.1.3(e) (see also 35 IAC 218.204) and complying by means of this Condition shall operate the subject coating line unless the owner or operator has demonstrated compliance with Condition 7.1.3(f)(i) or (f)(ii) (see also 35 IAC 218.205(b)) through the applicable coating analysis test methods and procedures specified in Condition 7.1.7 (see also 35 IAC 218.105(a)) and the recordkeeping and reporting requirements specified in Conditions 7.1.9 and 7.1.10 (see also 35 IAC 218.211(d)). No owner or operator of a miscellaneous metal parts and products coating line subject to the limitations of Condition 7.1.3(e) (see also 35 IAC 218.204(j)) shall apply coatings to miscellaneous metal parts or products on the subject coating line unless the requirements in Conditions 7.1.3(f)(i) or (f)(ii) (see also 35 IAC 218.205(b)(1) or (b)(2)) are met.

i. For each coating line which applies multiple coatings, all of which are subject to the same numerical emission limitation within Condition 7.1.3(e) (see also 35 IAC 218.204(j)) during the same day (e.g., all coatings used on the line are subject to 0.42 kg/l [3.5 lb/gal]), the daily-weighted average VOM content shall not exceed the coating VOM content limit corresponding to the category of coating used [35 IAC 218.205(b)(1)]; or

ii. For each coating line which applies coatings subject to more than one numerical emission limitation in Condition 7.1.3(e) (see also 35 IAC 218.204(j)), during the same day, the owner or operator shall have a site-specific proposal approved by the Illinois EPA and approved by the USEPA as a SIP revision. To receive approval, the requirements of USEPA's Emissions Trading Policy Statement (and related policy), 51 Fed. Reg. 43814 (December 4, 1986), must be satisfied [35 IAC 218.205(b)(2)].

7.1.4 Non-Applicability of Regulations of Concern

a. The curing and drying ovens on the affected coating lines are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the actual heat input of each unit is less than 2.9 MW (10 mmBtu/hr) and the curing and drying ovens are not by definition fuel combustion emission units.

b. The curing and drying ovens on the affected coating lines are not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the curing and drying ovens are not by definition fuel combustion emission units.

c. The affected coating lines are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

d. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.1.5 Operational and Production Limits and Work Practices

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

b. The curing and drying ovens on the affected coating lines shall only be operated with natural gas as the fuel.

7.1.6 Emission Limitations

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

7.1.7 Testing Requirements

a. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under Condition 7.1.7(b) (see also 35 IAC 218.211) [35 IAC 218.211(a)].

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.

7.1.8 Monitoring Requirements

None

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 the affected coating lines to demonstrate compliance with Conditions 5.5.1, and 7.1.3, pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.1.7, which include the following [Section 39.5(7)(e) of the Act]:

i. Identification of material tested;

ii. Results of analysis;

iii. Documentation of analysis methodology; and

iv. Person performing analysis.

b. Pursuant to 35 IAC 218.211(d)(2), the Permittee shall collect and record all of the following information each day for the affected coating lines and maintain the information at the source for a period of three years:

i. The name and identification number of each coating as applied on each affected coating line [35 IAC 218.211(d)(2)(A)];

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 each affected coating line [35 IAC 218.211(d)(2)(B)]; and

iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 IAC 218.104 [35 IAC 218.211(d)(2)(C)].

c. Records addressing use of good operating practices for the filters:

i. Records for periodic inspection of the filters with date, individual performing the inspection, and nature of inspection; and

ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

d. Coating usage, gal/mo and gal/yr;

e. The VOM content of coatings, % by Wt;

f. Density of coatings, lb/gal;

g. Cleanup solvent usage, gal/mo and gal/yr;

h. Density of solvent, lb/gal; and

i. The monthly and aggregate annual PM and VOM emissions from the affected coating line based on the operating schedule and the typical hourly emission rate, with supporting calculations.

7.1.10 Reporting Requirements

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

a. Pursuant to 35 IAC 218.211(d)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(f) (see also 35 IAC 218.205) within 30 days following the occurrence of the violation.

b. Pursuant to 35 IAC 218.211(d)(3)(B), at least 30 calendar days before changing the method of compliance with 35 IAC 218 Subpart F from Condition 7.1.3(f) (see also 35 IAC 218.205) to Condition

7.1.3(e) (see also 35 IAC 218.204), the owner or operator shall comply with all requirements of 35 IAC 218.211(c)(1). Upon changing the method of compliance with 35 IAC 218 Subpart F from Condition 7.1.3(f) (see also 35 IAC 218.205) to Condition 7.1.3(e) (see also 35 IAC 218.204), the owner or operator shall comply with all requirements of 35 IAC 218.211(c).

c. Continued operation of the affected coating line with a defect in the filters that may result in emissions of particulate matter in excess of limits in Condition 7.1.3(c) within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected 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 at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected coating lines remain in compliance.

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

a. Compliance with Condition 7.1.3(c) is assumed by proper operation of the filters, as addressed by Condition 7.1.5.

b. Compliance with Condition 7.1.3(d) is assumed by the work-practices inherent in operation of natural gas-fired drying/curing ovens.

c. Pursuant to 35 IAC 211.1670, "Daily-weighted average VOM content" means the average VOM content of two or more coatings as applied on a coating line during any day, taking into account the fraction of total coating volume that each coating represents, as calculated with the following equation:

$$VOM_W = \left[\sum_{i=1}^{n} V_i C_i\right] \Big/ V_T$$

where:

VOM_w = The average VOM content of two or more coatings as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM),

n = The number of different coatings as applied each day on a coating line,

V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

C_i = The VOM content of each coating as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM), and

V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

d. To determine compliance with Condition 5.5.1, emissions from the affected coating lines shall be calculated based on the following:

i. Volatile Organic Material Emissions:

VOM (lb) = [(Coating Usage, gal) x (Coating Density, lb/gal) x (VOM Content of Coating, % by Wt.)] + [(Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal)]

ii. Particulate Matter Emissions:

PM (lb) = (Wt of Coating Used, lb) x (Wt % Solids) x [1 - (Transfer Efficiency* (%)/100)] x [1 - (Filter Efficiency* (%)/100)]

*As specified by manufacturer or vendor of the affected coating lines and filters

7.2 Unit GA Lid Gasket Application

7.2.1 Description

After the coating operation is completed, the cover gaskets are glued onto the drum covers.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
GA	Cover Gasket Gluing (Gluing Line GA)	None

7.2.3 Applicability Provisions and Applicable Regulations

a. The Lid Gasket Application operation is an “affected gluing line” for the purpose of these unit-specific conditions.

b. The daily-weighted average VOM content shall not exceed 0.42 kg VOM/l (3.5 lb VOM/gal) of coating as applied (minus water and any compounds which are specifically exempted from the definition of VOM) during any day. Owners and operators complying with this limitation are not required to comply with 35 IAC 218.301 [35 IAC 218.926(b)(1)]

7.2.4 Non-Applicability of Regulations of Concern

The affected gluing line is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.926(b)(1), which excludes owners and operators complying with the limitation in 35 IAC 218.926(b)(1) from complying with 35 IAC 218.301.

7.2.5 Operational and Production Limits and Work Practices

None

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 Testing Requirements

a. When in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with Condition 7.2.3(b) (see also 35 IAC 218.926), the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart PP shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105 [218.928(a)].

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected gluing line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected gluing line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.2.9(b) directly reflect the application of such material and separately account for any additions of solvent.

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

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

a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.2.7, which

include the following [Section 39.5(7)(e) of the Act]:

i. Identification of material tested;

ii. Results of analysis;

iii. Documentation of analysis methodology; and

iv. Person performing analysis.

b. Pursuant to 35 IAC 218.991(b)(2), any owner or operator of a coating line which is subject to the requirements of 35 IAC 218 Subpart PP and complying by means of the daily-weighted average VOM content limitation shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating as applied on each coating line [35 IAC 218.991(b)(2)(A)];

ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line [35 IAC 218.991(b)(2)(B)]; and

iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 IAC 218.104 [35 IAC 218.991(b)(2)(C)].

c. Glue usage, gal/mo and gal/yr;

d. The VOM content of the glue, % by Wt;

e. Density of the glue;, lb/gal;

f. Cleanup solvent usage, gal/mo and gal/yr;

g. Density of solvent, lb/gal; and

h. The monthly and aggregate annual VOM emissions from the affected gluing line based on the operating schedule and the typical hourly emission rate, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected gluing line 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:

Any owner or operator of a coating line which is subject to the requirements of 35 IAC 218 Subpart PP and complying by means of the daily-weighted average VOM content limitation shall on and after a date consistent with 35 IAC 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA of a violation of the requirements of 35 IAC 218 Subpart PP by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.991(b)(3)(A)].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

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

a. Pursuant to 35 IAC 211.1670, "Daily-weighted average VOM content" means the average VOM content of two or more coatings as applied on a coating line during any day, taking into account the fraction of total coating volume that each coating represents, as calculated with the following equation:

$$VOM_W = \left[\sum_{i=1}^{n} V_i C_i\right] \Big/ V_T$$

where:

VOM_w = The average VOM content of two or more coatings as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM),

n = The number of different coatings as applied each day on a coating line,

V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

C_i = The VOM content of each coating as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM), and

V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

b. To determine compliance with Condition 5.5.1, emissions from the affected gluing line shall be calculated based on the following:

VOM (lb) = [(Glue Usage, gal) x (Glue Density, lb/gal) x (VOM Content of Glue, % by Wt.)] + [(Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal)]

7.2.13 Compliance Schedules

a. The Permittee was sent Violation Notice A-1999-00001 by the Illinois EPA for allegedly failing to demonstrate compliance with 35 IAC Part 218 Subpart PP, Miscellaneous Fabricated Product Manufacturing Process, for the gasket application operation (GA).

There is insufficient data to demonstrate that the gasket application operation is in compliance with 35 IAC Part 218, Subpart PP. Therefore the permit in Section 8.1 does not shield the Permittee from possible enforcement actions initiated by either USEPA or the Illinois EPA involving the above named emission units or acitivities. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such outstanding issue (e.g., include a new compliance schedule, identify appropriate applicable requirements, establish new requirements, and revise the ERMS baseline).

b. The gasket application operation shall comply with the following schedule of compliance to address compliance with the alleged violations of 35 IAC Part 203:

Milestone	Timing
The Permittee shall demonstrate compliance with 35 IAC Part 218 Subpart PP	No later than 30 days from the date issued of this permit

c. Submittal of Progress Reports

A Progress Report shall be submitted every six months, beginning six months from the date of issuance of this permit. The Progress Report shall contain at least the following:

i. The required timeframe for achieving the milestones in the schedule for compliance, and actual dates when such milestones were achieved.

ii. An explanation of why any required timeframe in the schedule of compliance was not met, and any preventive or corrective measures adopted.

7.3 Units OX-W, OX-E, OX-LP Drum Furnaces and Lid/Pail Furnace Controls AB-W, AB-E, AB-LP Afterburners

7.3.1 Description

Prior to the coating application the open head drums and the lids are cleaned to remove residue in the drum and lid/pail furnaces.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
OX-W	Natural Gas or #2 oil fired drum cleaning furnace (Drum Furnace OX-W)	Afterburner AB-W
OX-E	Natural Gas fired drum cleaning furnace (Drum Furnace OX-E)	Afterburner AB-E
OX-LP	Natural Gas fired lid/pail cleaning furnace (Lid/Pail Furnace OX-LP)	Afterburner AB-LP

7.3.3 Applicability Provisions and Applicable Regulations

a. The Drum Furnaces and the Lid/Pail Furnace are “affected furnaces” for the purpose of these unit-specific conditions.

b. Each affected furnace is subject to the emission limits identified in Condition 5.2.2.

c. The affected furnaces are subject to 35 IAC 212.321(a), which provides that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates

specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

ii. Because the expected process weight rate for the affected furnaces is 64,080 pounds per hour, combined the allowable PM emission rate for the affected furnaces set by 35 IAC 212.321 is 16.18 pounds per hour, combined.

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

e. Pursuant to 35 IAC 214.122(b)(2) and 214.304, no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from the burning of fuel at process emission units located in the Chicago major metropolitan area with actual heat input smaller than, or equal to 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hr of actual input when distillate fuel oil is burned (0.3 lb/mmBtu).

f. The affected furnaces are subject to 35 IAC 218 Subpart G, Use of Organic Material, which provides that:

i. 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 Condition 7.3.3(f)(ii) (see also 35 IAC 218.302) and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 218.301].

ii. Emissions of organic material in excess of those permitted by Condition 7.3.3(f)(i) (see also 35 IAC 218.301) are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert

85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 218.302(a)].

7.3.4 Non-Applicability of Regulations of Concern

a. The affected furnaces are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the actual heat input of each unit is less than 2.9 MW (10 mmBtu/hr) and the affected furnaces are not by definition fuel combustion emission units.

b. The affected furnaces are not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected furnaces are not by definition fuel combustion emission units.

c. The affected furnaces are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

7.3.5 Operational and Production Limits and Work Practices

a. Drum Furnace OX-E and Lid/Pail Furnace OX-LP shall only be operated with natural gas.

b. Drum Furnace OX-W shall only be operated with natural gas and/or distillate fuel oil.

c. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values shall not be used in Drum Furnace OX-W:

i. 0.28 weight percent, or

ii. The Wt percent given by the formula: Maximum Wt percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).

d. The afterburner combustion chamber of each affected furnace shall be preheated to at least the manufacturer's recommended temperature but no less

than the temperature at which compliance was demonstrated in the most recent compliance test, or 1600°F in the absence of a compliance test. This temperature shall be maintained during operation of the affected furnaces.

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

7.3.6 Emission Limitations

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

7.3.7 Testing Requirements

a. Pursuant to 35 IAC 212.110 and Section 39.5(7)(b) of the Act, testing for PM emissions shall be performed as follows:

i. Measurement of particulate matter emissions from stationary emission units subject to 35 IAC Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E [35 IAC 212.110(a)].

ii. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4 [35 IAC 212.110(b)].

iii. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 IAC Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA [35 IAC 212.110(c)].

b. Pursuant to 35 IAC 218.105(d)(1) and Section 39.5(7)(b) of the Act, the control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified below (see also 35 IAC 218.105(f)):

i. Volatile Organic Material Gas Phase Source Test Methods The methods in 40 CFR Part 60, Appendix A, delineated below shall be used to determine control device efficiencies [35 IAC 218.105(f)].

A. CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 min, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times [35 IAC 218.105(f)(1)].

B. 40 CFR Part 60, Appendix A, Method 1 or 1A shall be used for sample and velocity traverses [35 IAC 218.105(f)(2)].

C. 40 CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D shall be used for velocity and volumetric flow rates [35 IAC 218.105(f)(3)].

D. 40 CFR Part 60, Appendix A, Method 3 shall be used for gas analysis [35 IAC 218.105(f)(4)].

E. 40 CFR Part 60, Appendix A, Method 4 shall be used for stack gas moisture [35 IAC 218.105(f)(5)].

F. 40 CFR Part 60, Appendix A, Methods 2, 2A, 2C, 2D, 3 and 4 shall be performed, as applicable, at least twice during each test run [35 IAC 218.105(f)(6)].

G. Use of an adaptation to any of the test methods specified in Conditions 7.3.7(b)(i)(A), (B), (C), (D), (E) and (F) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) may not be used unless approved by the Illinois EPA and the USEPA on a case by case basis. An owner or operator must submit sufficient documentation for the Illinois EPA and the USEPA to find that the test methods specified in Conditions 7.3.7(b)(i)(A), (B), (C), (D), (E) and (F) (see also 35 IAC 218.105(f)(1), (2), (3), (4), (5) and (6)) will yield inaccurate results and that the proposed adaptation is appropriate [35 IAC 218.105(f)(7)].

ii. Notwithstanding other requirements of 35 IAC Part 218, upon request of the Illinois EPA where it is necessary to demonstrate compliance, an owner or operator of an emission unit which is subject to 35 IAC Part 218 shall, at his own expense, conduct tests in accordance with the applicable test methods and procedures specific in this Part. Nothing in this Condition (see also 35 IAC 218.105) shall limit the authority of the USEPA pursuant to the Clean Air Act, as amended, to require testing [35 IAC 218.105(i)].

7.3.8 Monitoring Requirements

An owner or operator that uses an afterburner to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner [35 IAC 218.105(d)(2)(A)(i)].

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 the affected furnaces to demonstrate compliance with Conditions 5.5.1, 7.3.3, and 7.3.5, pursuant to Section 39.5(7)(b) of the Act:

a. Pursuant to 35 IAC 212.110(e) and Section 39.5(7)(e) of the Act, the owner or operator of an emission unit subject 35 IAC Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed and shall include the following:

i. The date, place and time of sampling or measurements;

ii. The date(s) analyses were performed;

iii. The company or entity that performed the analyses;

iv. The analytical techniques or methods used;

v. The results of such analyses; and

vi. The operating conditions as existing at the time of sampling or measurement.

b. Records of equipment operation including the temperature of the afterburner combustion chamber of each affected furnace during the time of combustion;

c. Records addressing use of good operating practices for the afterburners:

i. Records for periodic inspection of the afterburners with date, individual performing the inspection, and nature of inspection; and

ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

d. The sulfur content of the distillate fuel oil used in Drum Furnace OX-W, % by Wt.;

e. The amount of drums and lids/pails cleaned in each affected furnace; and

f. The monthly and aggregate annual PM and VOM emissions from the affected furnaces based on the number of drums and lids/pails cleaned and the applicable emission factors, with supporting calculations.

7.3.10 Reporting Requirements

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

a. A person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from Condition 7.3.7(a) (see also 35 IAC 212.110) that will be used [35 IAC 212.110(d)].

b. Continued operation of an affected furnace with defects in an afterburner that may result in emissions of PM, or VOM in excess of the allowable limits specified in Condition 7.3.3 within 30 days of such an occurrence;

c. Any occurrence when the affected furnaces was not operated in compliance with the requirements of Condition 7.3.5, with date, description, and explanation; and

d. Any occurrence when the monitoring system required by Condition 7.3.8 was not in service prior to initially charging drums and lids/pails to the affected furnaces.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

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

a. Compliance with Conditions 7.3.3(c) and (f) is assumed to be achieved by proper operation of the afterburners, as addressed by Condition 7.3.5.

b. Compliance with Condition 7.3.3(d) is assumed to be achieved by the work-practices inherent in operation of natural gas-fired furnaces.

c. Compliance with Condition 7.3.3(e) is assumed to be demonstrated by operation of Drum Furnace OX-W with distillate fuel oil with a sulfur content meeting the specification of Condition 7.3.5(c).

d. To determine compliance with Condition 5.5.1, PM and VOM emissions from the affected furnaces shall be calculated based on the following emission factors:

Pollutant	Emission Factor (lb/drum)
PM	0.02646
VOM	Negligible

These are the emission factors for controlled drum burning, Table 4.8-3, AP-42, Volume I, Fifth Edition, Supplement D, January, 1995.

Furnace Emissions (lb) = (Number of Drums Cleaned) x
(The Appropriate Emission Factor, lb/drum)

7.4 Units BL Shot Blasters
Controls BG Baghouses

7.4.1 Description

After preliminary cleaning, the drums and lids are shot blasted to remove scales.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
BL-5O	Shot Blasting to remove scales (Shot Blaster L-5O)	Baghouse BG-5O
BL-5L	Shot Blasting to remove scales (Shot Blaster BL-5L)	Baghouse BG-5L
BL-PG	Shot Blasting to remove scales (Shot Blaster BL-PG)	Baghouse BG-5L
BL-PT	Shot Blasting to remove scales (Shot Blaster BL-PT)	Baghouse BG-PT
BL-3O	Shot Blasting to remove scales (Shot Blaster BL-3O)	Baghouse BG-3O
SBL-3L	Shot Blasting to remove scales (Shot Blaster BL-3L)	Baghouse BG-3L
BL-5T	Shot Blasting to remove scales (Shot Blaster BL-5T)	Baghouse BG-5T

7.4.3 Applicability Provisions and Applicable Regulations

a. Shot Blasters BL-5O, BL-5L, BL-PG, BL-PT, BL-3O, BL-3L and BL-5T are "affected shot blasters" for purposes of these unit-specific conditions.

b. Each affected shot blasters are subject to the emission limits identified in Condition 5.2.2.

7.4.4 Non-Applicability of Regulations of Concern

a. Pursuant to 35 IAC 212.681(c), 35 IAC 212.321, Particulate Matter from Process Emission Units, shall not apply to shot blasting.

b. The affected shot blasters are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas,

because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

7.4.5 Operational and Production Limits and Work Practices

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

7.4.6 Emission Limitations

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

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 each affected shot blasters to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. Records addressing use of good operating practices for the baghouses:

   i. Records for periodic inspection of the baghouses with date, individual performing the inspection, and nature of inspection; and

   ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

b. Shot usage of the affected shot blasters, lb/mo and ton/yr; and

c. The monthly and aggregate annual PM emissions from the affected shot blasters based on the operating schedule and the typical hourly emission rate, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected shot blasters 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:

None

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

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

To determine compliance with Condition 5.5.1, emissions from the affected shot blasters shall be calculated based on the following:

PM (lb) = (Shot Usage, lb) x [1 - (Baghouse Efficiency* (%)/100)]

*As specified by manufacturer or vendor of the baghouse.

7.5 Units SW-S, SW-P, SW-NS, AB-1 Alkaline Washers and Acid Bath

7.5.1 Description

Tight head containers are washed with an alkaline solution, flushed with acid to scavenge oxidation before the shot blasting operation.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
SW-S	Cleaning drum interiors for reconditioning (Alkaline Washer SW-S)	None
SW-P	Cleaning drum interiors for reconditioning (Alkaline Washer SW-P)	None
SW-NS	Cleaning drum interiors for reconditioning (Alkaline Washer SW-NS)	None
AB-1	Acid bath to remove rust (Acid Bath AB-1)	None

7.5.3 Applicability Provisions and Applicable Regulations

a. Alkaline Washers SW-S, SW-P, and SW-NS, and Acid Bath AB-1 are “affected washers” for the purpose of these unit-specific conditions.

b. 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, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.5.4 Non-Applicability of Regulations of Concern

None

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

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

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected washer to demonstrate compliance with Conditions 5.5.1 and 7.5.3, pursuant to Section 39.5(7)(b) of the Act:

a. Number of drums processed, drums/mo and drums/yr; and

b. The monthly and aggregate annual VOM emissions from the affected washers based on the operating schedule and the typical hourly emission rate, with supporting calculations.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected VARIABLE 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:

Emissions of VOM from the affected washers in excess of the limits specified in Condition 7.5.3(b) within 30 days of such an occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1 and 7.5.3, VOM emissions from the affected washers shall be calculated based on the following:

VOM (lb) = (Number of Drums Processed) x (0.09 lb VOM/Drum) x (0.10 lb VOM Emitted/lb VOM in Drum)

7.6 Unit Boiler Natural Gas-Fired Boiler

7.6.1 Description

This natural gas-fired boiler is used to produce steam and for heat generation at the source.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Boiler	Natural gas-fired boiler Maximum heat input capacity: 25.2 mmBtu/hr	None

7.6.3 Applicability Provisions and Applicable Regulations

a. The Natural Gas-Fired Boiler is an "affected boiler" for purposes of these unit-specific conditions.

b. The affected boiler is subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.6.4 Non-Applicability of Regulations of Concern

a. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, modified, or reconstructed after June 9, 1989. The affected boiler was were constructed prior to 1973, therefore, these rules do not apply.

b. The affected boiler is not subject to 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).

c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use Of Organic Material.

7.6.5 Operational and Production Limits and Work Practices

The affected boiler shall only be operated with natural gas as the fuel.

7.6.6 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.

7.6.7 Testing Requirements

None

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

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

None

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected boiler 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:

N/A

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

Compliance with Conditions 7.6.3(b) and (c) is assumed to be achieved by the work-practices inherent in operation of a natural gas-fired boiler, so that no compliance procedures are set in this permit addressing this regulation.

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 _____**{insert public notice start date}** (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 without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and 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 [Section 39.5(12)(a) of the Act]. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. 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;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. 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

A report summarizing required monitoring 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]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

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

8.6.3 Test Reports

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

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company’s representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

iii. Illinois EPA - Air Permit Section (MC 11)

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to comply with Title I requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or

denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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; 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.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where

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

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

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

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

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	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
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

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 _____

RWB:psj

I. INTRODUCTION

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

Palex Container Systems (formerly Acme Barrel Company) is located at 2300 West 13th Street, Chicago in Cook County. The source reconditions and recycles industrial shipping containers. Coatings are used to provide a durable, protective finish that resist weathering, abrasion, impacts, and in the case of interior linings, provide chemical resistance to the contents of the container. The drums are cleaned to remove residue either in drum furnaces or by using an alkaline solution. The method chosen depends on the residue material and type of drum. The drums are then shot blasted to complete the cleaning process and then are coated. The source has ten coating booths, five for interior coatings, and five for exterior coatings. After the coating operation is complete, the finished drums have cover gaskets glued onto the covers.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
SB-1	Interior Coating Line for drums first coat (Coating Booth SB-1)	Before 1973	Filter F-SB-1
SB-2	Interior Coating Line for drums first coat (Coating Booth SB-2)	Before 1973	Filter F-SB-2
SB-3	Interior Coating Line for drums second coat (Coating Booth SB-3)	Before 1973	Filter F-SB-3
SB-4	Interior Coating Line for drums clear coat (Coating Booth SB-4)	Before 1973	Filter F-SB-4
SB-5	Exterior Coating Line for open head drums (Coating Booth SB-5)	Before 1973	Filter F-SB-5
SB-6	Interior Coating Line for lids (Coating Booth SB-6)	Before 1973	Filter F-SB-6
SB-7	Exterior Coating Line for lids (Coating Booth SB-7)	Before 1973	Filter F-SB-7
SB-T	Exterior Coating line for tight head drums (Coating Booth SB-T)	Before 1973	Filter F-SB-T

Emission Unit	Description	Date Constructed	Emission Control Equipment
CB-R	Ring Dip Coating Line (Coating Booth CB-R)	Before 1973	None
SB-NS	Exterior Coating Line for open head drums (Coating Booth SB-NS)	Before 1973	Filter F-SB-NS
OV-D	Gas Fired Oven for drying water off inside and outside of drums (Drying Oven OV-D)	Before 1973	None
OV-E	Gas Fired Oven for drying coated metal parts in line with coating booths SB-5, SB-7 & SB-NS (Drying Oven OV-E)	Before 1973	None
OV-F	Gas Fired Oven for drying coated metal parts in line with coating booths SB-1 & SB-2 (Flash Off Oven OV-F)	Before 1973	None
OV-I	Gas Fired Oven for drying coated metal parts in line with coating booths SB-1, SB-2, SB-3, SB-4,& SB-6 (Drying Oven OV-I)	Before 1973	None
OV-R	Gas Fired Oven for drying coated metal parts in line with coating booth CB-R (Drying Oven OV-R)	Before 1973	None
OV-T	Gas Fired Oven for drying coated metal parts in line with coating booth SB-T (Drying Oven OV-T)	Before 1973	None
GA	Cover Gasket Gluing (Gluing Line GA)	Before 1973	None
OX-W	Natural Gas or #2 oil fired drum cleaning furnace (Drum Furnace OX-W)	Before 1973	Afterburner AB-W
OX-E	Natural Gas fired drum cleaning furnace (Drum Furnace OX-E)	Before 1973	Afterburner AB-E
OX-LP	Natural Gas fired lid/pail cleaning furnace (Lid/Pail Furnace OX-LP)	Before 1973	Afterburner AB-LP

Emission Unit	Description	Date Constructed	Emission Control Equipment
BL-5O	Shot Blasting to remove scales (Shot Blaster L-5O)	Before 1973	Baghouse BG-5O
BL-5L	Shot Blasting to remove scales (Shot Blaster BL-5L)	Before 1973	Baghouse BG-5L
BL-PG	Shot Blasting to remove scales (Shot Blaster BL-PG)	Before 1973	Baghouse BG-5L
BL-PT	Shot Blasting to remove scales (Shot Blaster BL-PT)	Before 1973	Baghouse BG-PT
BL-3O	Shot Blasting to remove scales (Shot Blaster BL-3O)	Before 1973	Baghouse BG-3O
SBL-3L	Shot Blasting to remove scales (Shot Blaster BL-3L)	Before 1973	Baghouse BG-3L
BL-5T	Shot Blasting to remove scales (Shot Blaster BL-5T)	Before 1973	Baghouse BG-5T
SW-S	Cleaning drum interiors for reconditioning (Alkaline Washer SW-S)	Before 1973	None
SW-P	Cleaning drum interiors for reconditioning (Alkaline Washer SW-P)	Before 1973	None
SW-NS	Cleaning drum interiors for reconditioning (Alkaline Washer SW-NS)	Before 1973	None
AB-1	Acid bath to remove rust (Acid Bath AB-1)	Before 1973	None
Boiler	Natural gas-fired boiler Maximum heat input capacity: 25.2 mmBtu/hr	Before 1973	None

III. EMISSIONS

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

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO_x)	6.6
Particulate Matter (PM)	4.39
Sulfur Dioxide (SO_2)	6.06
Volatile Organic Material (VOM)	254.2
HAP, not included in VOM or PM	----
TOTAL	271.25

IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

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

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

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

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

RWB:jar