

DRAFT/PROPOSED CAAPP PERMIT
8/30/13

Attention:

Edsal Manufacturing Company, Inc.
Attn: Bruce R. Murray
4400 South Packers
Chicago, IL 60609

State of Illinois

CLEAN AIR ACT PERMIT
PROGRAM (CAAPP) PERMIT

Source:

Edsal Manufacturing Company, Inc.
4400 South Packers
Chicago, IL 60609

I.D. No.: 031600BPK
Permit No.: 95120150

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application: Renewal

Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 031600BPK

Permit No.: 95120150

Statement of Basis No.: 95120150-1212

Date Application Received: March 05,2008

Date Issued: To Be Determined

Expiration Date: To Be Determined

Renewal Submittal Date: 9 Months Prior to To Be Determined

Source Name: Edsal Manufacturing Company, Inc.

Address: 4400 South Packers

City: Chicago

County: Cook

ZIP Code: 60609

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact John H. Michael at 217/785-1705.

Robert W. Bernoteit
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

RWB:MTR:JHM:jws

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Database

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Section 1 - Source Information

1. Addresses

Source

Edsal Manufacturing Company, Inc.
4400 South Parkers Ave.
Chicago, IL 60609

Owner

Edsal Manufacturing Company, Inc.
4400 south Parkers Ave.
Chicago, IL 60609

Operator

Edsal Manufacturing Company, Inc.
4400 South Parkers Ave.
Chicago, IL 60609

Permittee

The Owner or Operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

| | <i>Name</i> | <i>Title</i> |
|-----------------------------|--|--------------------|
| <i>Responsible Official</i> | Bruce Murray | Director of Safety |
| <i>Delegated Authority</i> | No other individuals have been authorized by the IEPA. | N/A |

Other Contacts

| | <i>Name</i> | <i>Phone No.</i> | <i>Email</i> |
|--------------------------|--------------|------------------|-------------------|
| <i>Source Contact</i> | Bruce Murray | 773/475 | bmurray@edsal.com |
| <i>Technical Contact</i> | Bruce Murray | 773/475 | bmurray@edsal.com |
| <i>Correspondence</i> | Bruce Murray | 773/475 | bmurray@edsal.com |
| <i>Billing</i> | Bruce Murray | 773/475 | bmurray@edsal.com |

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

| <i>I.D. No.</i> | <i>Permit No.</i> | <i>Single Source Name and Address</i> |
|-----------------|-------------------|---------------------------------------|
| N/A | N/A | N/A |

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Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 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.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

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upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source 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, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source 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]

c. Duty to Maintain Equipment

The source 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. [Section 39.5(7)(a) of the Act]

d. 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 there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA 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]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall 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 the Owner or Operator of the 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 Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source 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]

4. Testing

- a. 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

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any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

b. Retention of Records

- i. 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]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. 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.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source 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 IEPA, 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 To Be Determined _____ (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR."
- i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
- ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN."
- i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
- ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

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This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, 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]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA 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 source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. 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]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

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Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the 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.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, 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 toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS. The allotment of ATUs to this source is 632 ATUs per seasonal allotment period. The Permittee shall comply with all applicable requirements in Section 7.3 of this permit.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.

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- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(d)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee 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 Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

| |
|--|
| 2. <u>Applicable Plans and Programs</u> |
|--|

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

- i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:
 - A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.
 - B. Estimated frequency of application of dust suppressants by location.
 - C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.
- ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference

provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

- iii. The Fugitive PM Operating Program, as submitted by the Permittee on April 14, 1999, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, including the iron-making and steel-making roads, storage piles, access areas near storage piles, and other subject operations located at the facility that are subject to 35 IAC 212.309.
- iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Episode Action Plan

Should this source become subject to 35 IAC 244.142, the Permittee shall prepare, submit, and operate under an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures and submitted to the IEPA for its review. The Episode Action Plan shall contain the information specified in 35 IAC 244.144. The Permittee shall immediately implement the appropriate steps described in this Episode Action Plan should an air pollution alert or emergency be declared. Any future Episode Action Plan made by the Permittee during the permit term is automatically incorporated by reference provided the Episode Action Plan is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Episode Action Plan. In the event that the IEPA notifies the Permittee of a deficiency with any Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

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4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), 3.1(d), and 3.1(e).
 - II. Requirements in Conditions 3.2(a), 3.2(b), 3.2(c), and 3.2(d).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

| <u>Monitoring Period</u> | <u>Report Due Date</u> |
|--------------------------|------------------------|
| January through June | July 31 |
| July through December | January 31 |

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Powder Coating Systems

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|---|---|-----------------------------------|--|--|---------------------------|
| ShpPCS Powder Coating System | PM,VOM | 08/2001 | N/A | Dry Filter System | NONE |
| ShpLCO Shop Line Curing Over 2.8 mmBtu/hr | PM AND SO ₂ | 07/1969 | N/A | None | NONE |
| CLPCB Cabinet Line Powder Coating Booth | PM,VOM | 09/1996 | N/A | Dry Filter System | NONE |
| CLTUB Cabinet Line Touch-Up Booths | PM,VOM | 01/1972 | N/A | Dry Filters | NONE |
| CLCO Cabinet Line Curing Oven 1.02 mmBtu/hr | PM ,SO ₂ | 09/1996 | N/A | None | NONE |
| PCSPB Powder Coating System Powder Booth | PM,VOM | 06/1993 | N/A | Dry Filter System | NONE |
| PCSCO Powder Coating System Curing Oven 5.0 mmBtu/hr | PM,VOM,NO _x , CO , AND SO ₂ | 06/1993 | N/A | None | NONE |

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observation in accordance with Method 22 for visual emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the coating line and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

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Recordkeeping Requirements

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for visual emissions conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(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 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, to exceed the allowable emission rates specified in 35 IAC 212.321(c). (Also see Section 7.2(a))
- B. Pursuant to 35 IAC 212.322(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 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 prior to April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.322(c). (Also see Section 7.2(b))
- C. Pursuant Permit #93040067 the Powder Coating Systems, PCSPB, PM emissions shall not exceed the following limit:

| <u>Item of Equipment</u> | Particulate Matter Emissions | |
|-------------------------------|------------------------------|-----------------|
| | <u>(Lb/Hr)</u> | <u>(Ton/Yr)</u> |
| Powder Coating Booth PCSPB | 0.55 | 1.4 |

ii. Compliance Method (PM Requirements)

Monitoring

- A. The emissions of PM from the Powder Coating Systems, lb/mo and ton/yr (12 month rolling average), with the following supporting calculations.
- B. Pursuant to Section 39.5(7)(d) of the Act, the Permittee shall perform quarterly inspections of each filter.

Recordkeeping

- C. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep monthly and annual records of solids in applied coatings on each powder coating Systems.
- D. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep monthly and annual actual emissions of PM from each powder coating booth, with

supporting calculations, along with allowable PM emissions calculated in accordance with 35 IAC 212.321(a).

- E. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the control device (filters) inspection and maintenance log.

c. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant 35 IAC 218.204(g)(2)(B)(ii) the Permittee shall not apply at any time any coating in which the VOM content exceeds either of the following emission limitation for Metal Furniture Coating (Baked).

| | | solids applied | |
|-------|--------|----------------|---------|
| kg/l | lb/gal | kg/l | lb/gal. |
| 0.275 | 2.30 | 0.40 | 3.30 |

- B. Pursuant to Permit #93040067 Powder Coating System Curing Oven ,PCSCO, VOM emissions shall not exceed nominal emission rates of 0.01 lb/hr and 0.44 ton/yr.

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, compliance with Powder Coating System Curing Oven ,PCSCO, VOM emissions annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records of VOM emissions with supporting calculations.

d. i. Sulfur Dioxide Requirements (SO₂)

- A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. Compliance Method (SO₂ Requirements)

- A. The periodic monitoring requirements sufficient to meet 39.5(7)(f) of the Act are addressed by the operational and production requirements in Condition 4.1.2(h)

e. i. Carbon Monoxide Requirements (CO)

- A. Pursuant to Permit #93040067 the Powder Coating Systems, PCSCO, Curing Oven Coating Line CO emissions shall not exceed the following limits:

| <u>Item of Equipment</u> | EMISSIONS | |
|--------------------------|----------------|-----------------|
| | <u>(Lb/Hr)</u> | <u>(Ton/Yr)</u> |
| Curing Oven | 0.1 | 0.25 |

ii. Compliance Method (CO Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to CO emissions:

I. The emissions of CO from the Powder Coating Systems Curing Oven, lb/mo and ton/yr (12 month rolling average), with supporting calculations.

f. i. Nitrogen Oxide Requirements (NO_x)

A. Pursuant to Permit #93040067 the Powder Coating Systems, PCSCO, Curing Oven Coating Line NO_x emissions shall not exceed the following limits:

| Item of Equipment | EMISSIONS | |
|-------------------|-----------|----------|
| | (Lb/Hr) | (Ton/Yr) |
| Curing Oven | 0.5 | 1.25 |

ii. Compliance Method (NO_x Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to NO_x emissions:

I. The emissions of NO_x from the Powder Coating Systems Curing Oven, lb/mo and ton/yr (12 month rolling average), with supporting calculations.

g. i. Hazardous Air Pollutant Requirements (HAP)

A. The source is subject to the requirements of 40 CFR 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture. Pursuant to 40 CFR 63.4890(c) the Permittee shall limit organic HAP emissions to the atmosphere to no more than 0.83 lb/gal of coating solids.

ii. Compliance Method (HAP Requirements)

Recordkeeping

A. Pursuant to 40 CRF 63.4930 the Permittee shall keep the following records:

I. Information provided by materials suppliers or manufacturers:

1. Manufacturer's formulation data for the materials used
2. Test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material;
3. The volume fraction of coating solids for each coating.

II. A record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.4941.

h. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the Powder Coating Systems Curing Ovens.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records that the natural gas used is a pipeline quality natural gas with a sulfur content less than 2,000 ppm.

3. Non-Applicability Determinations

- a. Pursuant to 40 CFR 60.310(a) and 40 CFR 60.311, the Powder Coating Systems are not subject to the NSPS for Surface Coating of Metal Furniture, 40 CFR 60 Subpart EE, because the powder coating is excluded from the definition of organic coating.
- b. The Powder Coating Systems are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these emission units do not have potential precontrol device emissions of applicable regulated air pollutant that equal or exceeds major source threshold levels.
- c. The Curing Ovens are not subject to 35 IAC 216.121, because these emission units are not by definition the fuel combustion emission units

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i) , 4.1.2(c) , 4.1.2(d),4.1.2(e),4.1.2(f), 4.1.2(g), 4.1.2(h).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

b. Federal Reporting

b. Federal Reporting

- i. The Permittee shall submit the semiannual annual compliance reports, pursuant to 40 CFR 63.4920(a), as part of the annual compliance certification required by Condition 2.6(a) of this permit.
- ii. The annual compliance reports shall contain the information required by 40 CFR 63.4920(a)(1) through (4).
- iii. Pursuant to 40 CFR 63.4920(a)(5), any deviation from the work practice requirements shall be included into the semiannual monitoring reports required by Condition 3.5(b) of this permit.

4.2 Dip Coating Systems

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|-----------------------------------|-----------------------------------|--|--|---------------------------|
| ShpLDT Shop Line Dip Tank | PM,VOM,HAPs | 01/1973 | N/A | NONE | NONE |
| HEQLDT Home E-Quip Line Dip Tank | PM,VOM,HAPs | 07/1969 | N/A | NONE | NONE |
| HDQLCO Home E-Quip Line Curing Oven 1.2 mmBtu/hr | PM,SO ₂ | 07/1969 | N/A | NONE | NONE |
| PLDT Post Line Dip Tank | PM,VOM, HAPs | 07/1969 | N/A | NONE | NONE |
| Post Line Curing Oven 1.6 mmBtu/hr | PM,SO ₂ | 07/1969 | N/A | NONE | NONE |
| ShlfLDT Shelf Line Dip Tank | PM,VOM ,HAPs | 07/1969 | N/A | NONE | NONE |
| ShlfLCO Shelf Line Curing Oven 2.0 mmBtu/hr | PM,SO ₂ | 07/1969 | N/A | NONE | NONE |

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided for in 35 IAC 212.123(b).

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observation in accordance with Method 22 for visual emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the coating line and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

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- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for visual emissions conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant 35 IAC 218.204(g)(2)(A) the Permittee shall not apply at any time any coating in which the VOM content exceeds either of the following emission limitations for Metal Furniture Coating (Baked).

| | | solids applied | |
|-------|--------|----------------|---------|
| kg/l | lb/gal | kg/l | lb/gal. |
| 0.275 | 2.30 | 0.40 | 3.30 |

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

Testing

- B. Pursuant to 35 IAC 218.105(a), 218.208, 218.211(a), and Section 39.5(7)(b) of the Act, testing for VOM content of coatings shall be performed as follows:
 - I. On an annual basis, the VOM content of coatings "as applied" shall be determined according to 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 documentation for such testing to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent

Recordkeeping

Coating

- C. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected 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;
 - II. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;

III. The weight of VOM per volume of each coating (or the weight of VOM per volume of solids in each coating, as applicable) as applied each day on each coating line, and certified product data sheets for each coating.

D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records:

VOM Content Testing:

- I. Identification of material tested;
- II. Results of analyses or supplier documentation;
- III. Documentation of analysis methodology; and
- IV. Person performing analysis.

c. i. Sulfur Dioxide Requirements (SO₂)

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. Compliance Method (SO₂ Requirements)

A. The periodic monitoring requirements sufficient to meet 39.5(7)(f) of the Act are addressed by the operational and production requirements in Condition 4.1.2(e)

d. i. Hazardous Air Pollutant Requirements (HAP)

A. The source is subject to the requirements of 40 CFR 63 Subpart RRRR National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture. Pursuant to 40 CFR 63.4890(c) the Permittee shall limit organic HAP emissions to the atmosphere to no more than 0.83 lb/gal of coating solids.

ii. Compliance Method (HAP Requirements)

Monitoring

- A. Pursuant to 40 CFR 63.4942(a) monthly calculated organic content for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.4890(c) and each thinner and cleaning material used must contain no organic HAP.
- B. Pursuant to 40 CFR 63.4941(d), calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2.

Recordkeeping

C. Pursuant to 40 CFR 63.4930 the Permittee shall keep the following records:

- I. A copy of each notification and report that Permittee submitted to comply with 40 CFR 63.4930, and the documentation supporting each notification and report
- II. Information provided by materials suppliers or manufacturers:

1. Manufacturer's formulation data for the materials used
 2. Test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material;
 3. The volume fraction of coating solids for each coating.
- III. A record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.4941.

e. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the Dip Coating Systems Curing Ovens .

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records that the natural gas used is a pipeline quality natural gas with a sulfur content less than 2,000 ppm.

3. Non-Applicability Determinations

- a. The Dip Coating Systems are not subject to the New Source Performance Standards (NSPS) for Surface Coating of Metal Furniture, 40 CFR Part 60 Subpart EE, because the Dip Coating Systems constructed pre November 11, 1980.
- b. Pursuant to 35 IAC 218.209 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
- c. The Dip Coating Systems are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because these emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.
- d. The Curing Ovens are not subject to 35 IAC 216.121, because these emission units are not by definition the fuel combustion emission units

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c) and 4.2.2(d)(i) and 4.2.2)

- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

b. Federal Reporting

b. Federal Reporting

- i. The Permittee shall submit the semiannual annual compliance reports, pursuant to 40 CFR 63.4920(a), as part of the annual compliance certification required by Condition 2.6(a) of this permit.
- ii. The annual compliance reports shall contain the information required by 40 CFR 63.4920(a)(1) through (4).
- iii. Pursuant to 40 CFR 63.4920(a)(5), any deviation from the work practice requirements shall be included into the semiannual monitoring reports required by Condition 3.5(b) of this permit.

4.3 Wood Grain Coating System

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|-----------------------------------|-----------------------------------|--|--|---------------------------|
| Wood Grain Coating System Roll coater and associated preheater and cleaning unit | PM, VOM, HAPs | 01/2010 | N/A | None | None |

2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided for in 35 IAC 212.123(b).

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observation in accordance with Method 22 for visual emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the coating line and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for visual emissions conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(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 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, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

- B. Pursuant to Construction Permit #09090025 Wood Grain Coating System PM emission shall not exceed 0.1 lb/hour and 0.44 tons/hear.

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to 39.5(7)(a) of the Act, compliance with annual PM limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

Recordkeeping

- B. Pursuant to 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
 - I. A file containing the PM emission with supporting documentation.
 - II. The hours of operation for the Wood Grain Coating Systems, hr/mo and hr/yr.
 - III. The emissions of PM from the Wood Grain Coating Systems, lb/mo and ton/yr (12 month rolling average), with the following supporting calculations.

c. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant 35 IAC 218.204(1)(3)(D) the Permittee shall not apply at any time any coating in which the VOM content exceeds the following emission limitations for Metal Furniture Coating (Baked). The following emission limitation is 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. 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 :

| | |
|------|--------|
| kg/l | lb/gal |
| 0.79 | 6.6 |

- B. Pursuant to Construction Permit #09090025 emissions of the Wood Grain Coating System, including cleaning activities, shall not exceed the following limits [T1]:

| VOM Usage | | VOM Emissions | |
|-----------|----------|---------------|----------|
| (Ton/Mo) | (Ton/Yr) | (Ton/Mo) | (Ton/Yr) |
| 3.4 | 20.33 | 3.4 | 20.33 |

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Pursuant to 39.5(7)((a) of the Act, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

Testing

- B. Pursuant to 35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act, testing for VOM content of coatings and cleanup solvents shall be performed as follows:
 - I. On an annual basis, the VOM content of coatings "as applied" on the paint spray booths shall be determined according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
 - II. The VOM content of the cleaning solvents used on each booth shall be tested annually according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208, and 218.211(a).
 - III. This testing may be performed by the supplier of a material provided that the supplier provides documentation for such testing to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records:

Coating:

- I. The usage of each coating, in units of gallons/month and gallons/year.
- II. Density of each coating in units of lb/gallon.
- III. VOM content of each coating in weight percent.
- IV. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected coating operations.

VOM Emissions:

- V. Total monthly and annual VOM emissions from all coating operations (ton/mo and ton/yr) with supporting calculations. .

VOM Content Testing (wt.%):

- VI. Identification of material tested;
- VII. Results of analyses or supplier documentation;
- VIII. Documentation of analysis methodology; and
- IX. Person performing analysis.

d. i. Hazardous Air Pollutant Requirements (HAP)

- A. Pursuant to 40 CFR 63.802(b)(1) and Table 3 of 40 CFR 63 , Subpart JJ the Permittee shall limit applied wood grain to a maximum 0.8 lbs VHAP/ lb of solid.

ii. Compliance Method (HAP Requirements)

- A. Pursuant to 40 CFR 63.804(d)(2) the Permittee shall demonstrate compliance with 40 CFR 63.802(b)(1) with following criteria:
 - I. Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;
 - II. Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and
 - III. Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

Recordkeeping

- B. Pursuant to 40 CFR 63.806 the Permittee shall keep the following record:
 - I. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in 63.802; and
 - II. The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in 63.802.

e. i. Work Practice Requirements

- A. Pursuant to 40 CFR 63.803(a) through 63.803(l), the Permittee shall prepare and maintain a written work practice implementation plan addressing the following work practice standards:
 - I. Operator training course
 - II. Inspection and maintenance plan
 - III. Cleaning and washoff solvent accounting system
 - IV. Chemical composition of cleaning and washoff solvents
 - V. Spray booth cleaning. Each owner or operator
 - VI. Storage requirements
 - VII. Application equipment requirements
 - VIII. Line cleaning
 - IX. Gun cleaning
 - X. Washoff operations
 - XI. Formulation assessment plan for finishing operations.

ii. Compliance Method (Work Practice Requirements)

Recordkeeping

- A. Pursuant to 40 CFR 63.806(e) the Permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
- I. Records demonstrating that the operator training program required by Condition 4.3.2(e)(i)(A)(I) is in place;
 - II. Records collected in accordance with the inspection and maintenance plan required by Condition 4.3.2(e)(i)(A)(II);
 - III. Records associated with the cleaning solvent accounting system required by Condition 4.3.2(e)(i)(A)(III) ;
 - IV. Records associated with the formulation assessment plan required by Condition 4.3.2(e)(i)(A)(XI) ; and
 - V. Copies of documentation such as logs developed to demonstrate that the other provisions of Condition 4.3.2(e)(i) Work Practice Requirements implementation plan are followed.

Non-Applicability Determinations

- a. Pursuant to 35 IAC 218.209 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,

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), 4.3.2(c)(i) 4.3.2(d) and 4.3.2(e).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.

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- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

Federal Reporting

- A. Pursuant to 40 CFR 63.807 (b) the Permittee demonstrating compliance in accordance with 40 CFR 63.804(f) (1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by 40 CFR 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by 40 CFR 63.804(f) (1), (2), (3), (5), (7), and (8) of this Subpart.
- B. Pursuant to 40 CFR 63.807 (c) the Permittee demonstrating compliance in accordance with 40 CFR 63.804(g)(1), (2), (3), (5), (7), (8), (h)(1), and (h)(3) shall submit a report covering the previous 6 months of wood furniture manufacturing operations.
- C. Pursuant to 40 CFR 63.807 (e) the Permittee required to provide a written notification under 40 CFR 63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

4.4 Washers

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|--|-----------------------------------|--|--|---------------------------|
| ShpLW Shop Line Washer 5.25 mmBtu/hr | PM | 07/1969 | N/A | NONE | NONE |
| CLW Cabinet Line Washer 5.25 mmBtu/hr | PM | 09/1969 | N/A | NONE | NONE |
| HEQLW Home E-Quip Line Washer 5.00 mmBtu/hr | PM | 07/1969 | N/A | NONE | NONE |
| PLW Post Line Washer 6.75 mmBtu/hr | PM | 07/1969 | N/A | NONE | NONE |
| ShflLW Shelf Line Washer 4.65 mmBtu/hr | PM | 07/1969 | N/A | NONE | NONE |
| PCSW Powder Coating System Washer 8.0 mmBtu/hr) and Dry-Off Oven 5.00 mmBtu/hr | PM, SO ₂ , NO _x , and CO | 06/1963 | N/A | NONE | NONE |

2. Applicable Requirements

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided for in 35 IAC 212.123(b).

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observation in accordance with Method 22 for visual emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the coating line and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

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- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for visual emissions conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.322(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 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 prior to April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

ii. Compliance Method (PM Requirements)

Recordkeeping

- A. Pursuant to 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
 - I. A file containing the PM emission with supporting documentation.
 - II. The hours of operation for the Washers, hr/mo and hr/yr.
 - III. The emissions of PM from the Washers, lb/mo and ton/yr (12 month rolling average), with the following supporting calculations.

c. i. Sulfur Dioxide Requirements (SO₂) (PCSW Dry-off Ovens only)

- A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. Compliance Method (SO₂ Requirements)

- A. The periodic monitoring requirements sufficient to meet 39.5(7)(f) of the Act are addressed by the operational and production requirements in Condition 4.4.2(f)

d. i. Carbon Monoxide Requirements (CO)

- A. Pursuant to Permit #93040067 the Powder Coating System Washer and Dry-Off Oven, CO emissions shall not exceed the following limits:

| <u>Item of Equipment</u> | EMISSIONS | |
|---------------------------|----------------|-----------------|
| | <u>(Lb/Hr)</u> | <u>(Ton/Yr)</u> |
| Three-Stage Washer (PCSW) | 0.1 | 0.25 |
| Dry Off Oven | 0.07 | 0.18 |

ii. Compliance Method (CO Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to CO emissions:
 - I. The emissions of CO from the Washers, lb/mo and ton/yr (12 month rolling average), with supporting calculations.

e. i. Nitrogen Oxide Requirements (NO_x)

- A. Pursuant to Permit #93040067 the Powder Coating System Washers and Dry-Off Oven, NO_x emissions shall not exceed the following limits:

| <u>Item of Equipment</u> | <u>EMISSIONS</u> | |
|---------------------------|------------------|-----------------|
| | <u>(Lb/Hr)</u> | <u>(Ton/Yr)</u> |
| Three-Stage Washer (PCSW) | 0.5 | 1.25 |
| Dry Off Oven | 0.35 | 0.87 |

ii. Compliance Method (NO_x Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to NO_x emissions:
 - I. The emissions of NO_x from the Washers, lb/mo and ton/yr (12 month rolling average), with supporting calculations.

f. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the Shop Line Washer, Cabinet Line Washer, Home E-Quip Line Washer, Post Line Washer, Shelf Line Washer, and Powder Coating Washer..

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records that the natural gas used is a pipeline quality natural gas with a sulfur content less than 2,000 ppm.

3. Non-Applicability Determinations

- a. The Washers are not subject to the New Source Performance Standards (NSPS) for National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Part 60 Subpart T, because the Washers do not use Halogenated Cleaning Solvent.
- b. The Washers are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the Washers are less than 10 mmBtu/hr.
- c. The Washers are not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides from Existing Fuel Combustion Emission Sources in Major Metropolitan Area, because the Washers are not by definition fuel combustion emission unit.

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- d. The Washers Process Heaters are not subject to 40 CFR 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters because the source is considered a natural minor source for HAP's.
- e. The Washers Process Heaters are not subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Source, 40 CFR Part 63 Subparts A and JJJJJJ, because the Washers Process Heaters are gas-fired pursuant to 40 CFR 63.11195(e).

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), 4.4.2(c), 4.4.3(d), 4.4.2(e) and 4.4.2(f).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.5 Heating Cleaning Oven

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|---|-----------------------------------|-----------------------------------|--|--|---------------------------|
| BCO-1 Heat Cleaning Oven 1.0 mmBtu/hr | PM,SO ₂ | 03/1990 | N/A | Afterburner | Temperature Indicator |

2. Applicable Requirements

For the emission units in Condition 4.5.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), the Permittee shall not cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided for in 35 IAC 212.123(b).

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observation in accordance with Method 22 for visual emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the coating line and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for visual emissions conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(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 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, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

ii. Compliance Method (PM Requirements)

Recordkeeping

- A. Pursuant to 39.5(7)(a) of the Act, the Permittee shall keep the following records related to PM emissions:
 - I. A file containing the PM emission with supporting documentation.
 - II. The hours of operation for the Heat Cleaning Oven Systems, hr/mo and hr/yr.
 - III. The emissions of PM from the Heat Cleaning Oven, lb/mo and ton/yr (12 month rolling average), with the following supporting calculations.

c. i. Sulfur Dioxide Requirements (SO₂)

- A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. Compliance Method (SO₂ Requirements)

- A. The periodic monitoring requirements sufficient to meet 39.5(7)(f) of the Act are addressed by the operational and production requirements in Condition 4.5.2(d)

d. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the Powder Coating Systems.
- B. Pursuant of Section 39.5(7)(a)the Act ,the Permittee shall operate in accordance with the following requirements :
 - I. Material insulated with polyvinyl chloride or asbestos, or scrap containing the fuming metals tin, zinc, or lead shall not be charged to the affected heat cleaning oven.
 - II. The afterburner combustion chamber shall be preheated and maintained at the manufacturer's recommended temperature but not lower than 1400°F.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall operate in the afterburner equipped with a temperature indicator for combustion chamber temperature.
- B. Semi-annual inspections
 - I. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall conduct semi-annual inspections of integrity of Heating Cleaning Oven with associated afterburner and conduct any required maintenance or repair.

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records that the natural gas used is a pipeline quality natural gas with a sulfur content less than 2,000 ppm.
- B. Pursuant to Section 39.5(7)(b) Permittee shall maintain records of following items :
 - I. Records of equipment operation including the afterburner combustion chamber temperature during the time of combustion;
 - II. Records of inspections performed and a maintenance log.
 - III. The amount and type of material introduced to the affected heat cleaning oven, tons/mo and tons/yr;
- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep inspection and maintenance logs. These records shall include at least the following:
 - I. Date and time inspections were performed,
 - II. Name(s) of inspection personnel,
 - III. Identification of equipment being inspected,
 - IV. Findings of the inspections,
 - V. Description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The Heat Cleaning Oven is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected heat cleaning oven is not by definition a fuel combustion emission unit.
- b. The Heat Cleaning Oven is not subject to 35 IAC 216.141, Emissions of Carbon Monoxide from Incinerators, because the affected heat cleaning oven is not by definition an incinerator.
- c. The Heat Cleaning Oven is not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Sources, because the affected heat cleaning oven is not by definition fuel combustion emission unit.
- d. The Heat Cleaning Oven is not subject to 35 IAC 212.181(d), Particulate Matter Emissions from Incinerators, because the affected heat cleaning oven is not by definition an incinerator.
- e. The Heating Cleaning Oven at the source is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source does not have potential pre-control device emissions of VOM that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

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Date Issued: TBD

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.5.2(a)(i), 4.5.2(b)(i), 4.5.2(c) and 4.5.2(d).
 - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.6 Space Heaters

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|---|-----------------------------------|-----------------------------------|--|--|---------------------------|
| Building "A" two Air Make-up each at 3.2 mmBtu/hr | Opacity | Unknown | Unknown | None | None |
| Building "B" two Space Heaters each at 3.125 mmBtu/hr | Opacity | Unknown | Unknown | None | None |
| Building "B" one Space Heaters at 2.592 mmBtu/hr | Opacity | Unknown | Unknown | None | None |

2. Applicable Requirements

For the emission units in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123:

I. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the affected boiler and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all Method 9 opacity measurements made in accordance with Condition 4.6.2(a)(ii)(A) above.

b. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the space heaters.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the type of fuel fired in the space heaters.

3. Non-Applicability Determinations

- a. The space heaters are not subject to the New Source Performance Standards (NSPS) for Small Industrial Commercial Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc, because the space heater is less than 10 mmBtu/hr..
- b. The space heaters are not subject to 35 IAC 216.121 because the space heaters are less than 10 mmBtu/hr.
- c. The space heaters are not subject to 35 IAC 217.141 because the actual heat input less than 250 mmBtu/hr.
- f. The space heaters are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the space heaters does not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.6.2(a)(i),
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.

- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

Section 5 - Additional Title I Requirements

1. Construction Permits - (Equipment Not Yet Built)

The Permittee shall comply with all applicable requirements of Condition 7.5 for all appropriate emission unit(s) identified in Condition 7.5 pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. The Permittee shall certify compliance with the applicable requirements of Condition 7.5 as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new requirements in accordance to Condition 2.9 when the equipment is constructed.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

This condition is reserved for insignificant activities, as defined in 35 IAC 201.210 and 201.211, which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

| <i>Insignificant Activity</i> | <i>Number of Units</i> | <i>Insignificant Activity Category</i> |
|---|------------------------|--|
| Boiler BO-1 | 1 | 35 IAC 201.210(a)(1) and 201.211 |
| Mig welding | 1 | 35 IAC 201.210(a)(2) or (a)(3) |
| Direct combustion units used for comfort heating and fuel combustion units as further detailed in 35 IAC 201.210(a)(4). | 78 | 35 IAC 201.210(a)(4) |

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
- b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

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a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
 - A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.
- iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. 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 emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

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| 2. PM Process Weight Rate Requirements |
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a. New Process Emission Units - 35 IAC 212.321

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM 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 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

| P (T/hr) | E (lbs/hr) | P (T/hr) | E (lbs/hr) |
|-------------|---------------|-------------|---------------|
| 0.05 | 0.55 | 25.00 | 14.00 |
| 0.10 | 0.77 | 30.00 | 15.60 |
| 0.20 | 1.10 | 35.00 | 17.00 |
| 0.30 | 1.35 | 40.00 | 18.20 |
| 0.40 | 1.58 | 45.00 | 19.20 |
| 0.50 | 1.75 | 50.00 | 20.50 |
| 0.75 | 2.40 | 100.00 | 29.50 |
| 1.00 | 2.60 | 150.00 | 37.00 |
| 2.00 | 3.70 | 200.00 | 43.00 |
| 3.00 | 4.60 | 250.00 | 48.50 |
| 4.00 | 5.35 | 300.00 | 53.00 |
| 5.00 | 6.00 | 350.00 | 58.00 |
| 10.00 | 8.70 | 400.00 | 62.00 |
| 15.00 | 10.80 | 450.00 | 66.00 |
| 20.00 | 12.50 | 500.00 | 67.00 |

b. Existing Process Emission Units - 35 IAC 212.322

Existing Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322].

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- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c)). See Condition 7.2(b)(iii) below. [35 IAC 212.322(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.322(c) shall be determined by using the equation [35 IAC 212.322(b)]:

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

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

- A. Process weight rates of less than 450 T/hr:

A = 4.10
B = 0.67
C = 0

- B. Process weight rates greater than or equal to 450 T/hr:

A = 55.0
B = 0.11
C = -40.0

- iii. Limits for Existing Process Emission Units [35 IAC 212.322(c)]:

| <u>P</u> (T/hr) | <u>E</u> (lbs/hr) | <u>P</u> (T/hr) | <u>E</u> (lbs/hr) |
|--------------------|----------------------|--------------------|----------------------|
| 0.05 | 0.55 | 25.00 | 35.40 |
| 0.10 | 0.87 | 30.00 | 40.00 |
| 0.2 | 1.40 | 35.00 | 41.30 |
| 0.30 | 1.83 | 40.00 | 42.50 |
| 0.40 | 2.22 | 45.00 | 43.60 |
| 0.50 | 2.58 | 50.00 | 44.60 |
| 0.75 | 3.38 | 100.00 | 51.20 |
| 1.00 | 4.10 | 150.00 | 55.40 |
| 2.00 | 6.52 | 200.00 | 58.60 |
| 3.00 | 8.56 | 250.00 | 61.00 |
| 4.00 | 10.40 | 300.00 | 63.10 |
| 5.00 | 12.00 | 350.00 | 64.90 |
| 10.00 | 19.20 | 400.00 | 66.20 |
| 15.00 | 25.20 | 450.00 | 67.70 |
| 20.00 | 30.50 | 500.00 | 69.00 |

3. Emissions Reduction Market System (ERMS) Requirements

- a. Pursuant to 35 IAC Part 205, this source is considered a "participating source" for purposes of the ERMS.
- b. Obligation to Hold Allotment Trading Units (ATUs)
- i. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 7.3(g), 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 7.3(d):
- A. VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit, in accordance with 35 IAC 205.220.
- B. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 4 of this permit, in accordance with 35 IAC 205.225.
- C. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3).
- D. Excess VOM emissions that are a consequence of an emergency as approved by the IEPA, pursuant to 35 IAC 205.750.
- E. VOM emissions from certain new and modified emission units as addressed by Condition 7.3(g)(ii), if applicable, in accordance with 35 IAC 205.320(f).
- ii. In accordance with 35 IAC 205.150(c)(2), notwithstanding the Condition 7.3(b)(i) above, 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 4 of this permit.
- c. Market Transactions
- i. As specified in 35 IAC 205.610(a), the source shall apply to the IEPA for and obtain authorization for a Transaction Account prior to conducting any market transactions.
- ii. Pursuant to 35 IAC 205.610(b), the Permittee shall promptly submit to the IEPA any revisions to the information submitted for its Transaction Account.
- iii. Pursuant to 35 IAC 205.620(a), the source shall have at least one account officer designated for its Transaction Account.
- iv. 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 IEPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the IEPA for entry into the Transaction Account database.
- d. Emissions Excursion Compensation
- Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 7.3(b), it shall provide emissions excursion compensation in accordance with the following:

- i. Upon receipt of an Excursion Compensation Notice issued by the IEPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - A. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - B. 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.
- ii. If requested in accordance with paragraph 7.3(d)(iii) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the IEPA 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.
- iii. 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 IEPA, rather than purchased from the ACMA.

e. Quantification of Seasonal VOM Emissions

- i. Pursuant to 35 IAC 205.315(b), the methods and procedures specified in Sections 3 and 4 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:

No exceptions
- ii. In accordance with 35 IAC 205.750, the Permittee shall report emergency conditions at the source to the IEPA 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:
 - A. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency.
 - B. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

f. Annual Account Reporting

- i. Pursuant to 35 IAC 205.300, 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 IEPA for the seasonal allotment period. This report shall include the following information:
 - A. Actual seasonal emissions of VOM from the source.
 - B. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations.
 - C. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337.

- D. 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 IEPA.
 - E. 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).
 - F. 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.
- ii. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.
- g. Allotment of ATUs to the Source
- i. A. The allotment of ATUs to this source is 632 ATUs per seasonal allotment period.
 - B. This allotment of ATUs reflects the IEPA's determination that the source's baseline emissions were 71.81 tons per season.
 - C. 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 7.3(i) of this permit.
 - D. ATUs will be issued to the source's Transaction Account by the IEPA 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.
 - E. Condition 7.3(b)(i) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the IEPA into the Transaction Account for the source.
- ii. Contingent Allotments for New or Modified Emission Units
- None
- iii. 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:
- A. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630.
 - B. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720.
 - C. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

h. Recordkeeping for ERMS

Pursuant to 35 IAC 205.700(a), the Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS:

- i. Seasonal component of the Annual Emissions Report.
- ii. Information on actual VOM emissions, as specified in detail in Sections 3 and 4 of this permit and Condition 7.3(e)(i).
- iii. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

i. Exclusions from Further Reductions

- i. A. Pursuant to 35 IAC 205.405(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:
 - 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.
 - III. An emission unit for which a LAER demonstration has been approved by the IEPA on or after November 15, 1990.
- B. Pursuant to 35 IAC 205.405(a) and (c), the source has demonstrated in its ERMS application and the IEPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above:
 - Heat Cleaning Oven
 - Heat Cleaning Oven Afterburner
 - Shop Line Curing Oven
 - Cabinet Line Curing Oven
 - Home E-quip Curing Oven
 - Post Line Curing Oven
 - Shelf Line Curing Oven
 - Boiler
 - Space Heaters - Building A
 - Space Heaters - Building B
- ii. A. Pursuant to 35 IAC 205.405(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.
- B. Pursuant to 35 IAC 205.405(b) and (c), the source has demonstrated in its ERMS application and the IEPA 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:
 - None

4. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subpart A and RRRR - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture

Pursuant to 40 CFR 63 Subpart A and RRRR, the Permittee shall comply with the following applicable General Provisions as indicated:

| <i>General Provision Citation</i> | <i>General Provision Applicable?</i> | <i>Subject of Citation</i> | <i>Explanation (if required)</i> |
|-----------------------------------|--------------------------------------|--|--|
| 40 CFR 63.1 | Yes | General Applicability of the General Provisions | Except 63.1(c)(2)-(3) |
| 40 CFR 63.2 | Yes | Definitions | |
| 40 CFR 63.3 | Yes | Units and Abbreviations | |
| 40 CFR 63.4 | Yes | Prohibited Activities and Circumvention | |
| 40 CFR 63.5 | Yes | Preconstruction Review and Notification Requirements | |
| 40 CFR 63.6 | Yes | Compliance with Standards and Maintenance Requirements | Except 63.6(h) |
| 40 CFR 63.7 | Yes | Performance Testing Requirements | |
| 40 CFR 63.8 | Yes | Monitoring Requirements | Except 63.8((a)(4),(c)(4)-(6)(8),(d)-(e), and 63.8(g)(1)-(5) |
| 40 CFR 63.9 | Yes | Notification Requirements | 63.9(f) |
| 40 CFR 63.10 | Yes | Recordkeeping and Reporting Requirements | 63.10(b)(2)(xiii),(c)(7)-(8),(d)(3),(e)(1)-(4) |
| 40 CFR 63.11 | No | Control Device and Work Practice Requirements | |
| 40 CFR 63.12 | Yes | State Authority and Delegations | |
| 40 CFR 63.13 | Yes | Addresses of State Air Pollution Control Agencies and EPA Regional Offices | |
| 40 CFR 63.14 | Yes | Incorporations by Reference | |
| 40 CFR 63.15 | Yes | Availability of Information and Confidentiality | |

b. 40 CFR 63 Subpart A and JJ - National Emission Standards for Wood Furniture Manufacturing Operations

Pursuant to 40 CFR 63 Subpart A and JJ, the Permittee shall comply with the following applicable General Provisions as indicated:

| <i>General Provision Citation</i> | <i>General Provision Applicable?</i> | <i>Subject of Citation</i> | <i>Explanation (if required)</i> |
|-----------------------------------|--------------------------------------|---|----------------------------------|
| 40 CFR 63.1 | Yes | General Applicability of the General Provisions | 63.1(b)(1),(c)(1)-(2) |
| 40 CFR 63.2 | Yes | Definitions | |
| 40 CFR 63.3 | Yes | Units and Abbreviations | |

Section 7 - Other Requirements
7.4 - 40 CFR 63 Subpart A
Requirements (NESHAP)

| <i>General Provision Citation</i> | <i>General Provision Applicable?</i> | <i>Subject of Citation</i> | <i>Explanation (if required)</i> |
|---|--|--|---|
| 40 CFR 63.4 | Yes | Prohibited Activities and Circumvention | |
| 40 CFR 63.5 | Yes | Preconstruction Review and Notification Requirements | |
| 40 CFR 63.6 | Yes | Compliance with Standards and Maintenance Requirements | Except (b)(4),(c)(2),(e)(1)(i)-(ii),(e)(2)-(3),(f)(1),(h)(i)(4)(ii), |
| 40 CFR 63.7 | Yes | Performance Testing Requirements | Except 63.7(e)(1) |
| 40 CFR 63.8 | Yes | Monitoring Requirements | Except 63.8(c)(1)(i),(c)(1)(iii), |
| 40 CFR 63.9 | Yes | Notification Requirements | Except 63.9(f) |
| 40 CFR 63.10 | Yes | Recordkeeping and Reporting Requirements | Except 63.10(b)(2)(i),(b)(2)(ii),(b)(2)(iv)-(v),(c)(10)-(11)(15),(d)(5) |
| 40 CFR 63.11 | No | Control Device and Work Practice Requirements | |
| 40 CFR 63.12 | Yes | State Authority and Delegations | |
| 40 CFR 63.13 | Yes | Addresses of State Air Pollution Control Agencies and EPA Regional Offices | |
| 40 CFR 63.14 | Yes | Incorporations by Reference | |
| 40 CFR 63.15 | Yes | Availability of Information and Confidentiality | |

5. Construction Permits

The Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. Construction Permit #13050002 (Equipment Not Yet Constructed) [T1]

Permit is hereby granted to the above designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of two new powder coating booths with filters, as described in the above referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Introduction

This Permit authorizes construction of two powder coating booths equipped with filters (the affected booths) in the existing "Building B" powder coating line (the affected coating line). This line coats metal furniture/furniture parts. The material coated in these new booths would continue to be prepared for coating by an existing wash system. The coated material from these booths would be cured in the existing curing oven. The Permittee plans for these new booths to replace the existing booth on the affected coating line.

2. Applicable Emission Standards

a. This Permit does not affect the emission standards and requirements that apply to the affected coating line, as addressed in Section 7.1 of the current Clean Air Act Permit Program (CAAPP) permit for the source, Permit 95120150.

b. The affected booths are subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, exceeds the allowable emission rates specified in 35 IAC 212.321(c).

Note: Because the expected process weight rate for each affected booth is less than 100 pounds per hour, the allowable PM emission rate for each booth set by 35 IAC 212.321 is 0.55 pounds per hour.

3. Operational Requirements Practices

The Permittee shall follow good operating practices for the final or secondary filter on each affected booth, including periodic inspection, routine maintenance and prompt repair of defects.

4. Emissions

a. This permit is issued based on minimal emissions of particulate matter (PM) from the affected powder coating booths. For this purpose, PM emissions of each booth shall not exceed 1.1 tons/year.

b. This permit is issued based on negligible emission of volatile organic material (VOM) from the affected line from the coatings that are applied and cured on the line. For this purpose, total VOM emissions from the line shall not exceed 0.44 tons/year.

5. Recordkeeping Requirements

The Permittee shall maintain records addressing use of good operating practices for the final filters on the affected booths, including:

- a. Records for periodic inspection of the filters, with date, individual performing the inspection, and nature of inspection; and
 - b. Records documenting prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
6. Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, of deviations of an affected booth with requirements of this permit in accordance with applicable requirements for reporting of deviations involving the affected coating line in CAAPP Permit 95120150.

7. Authorization to Operate

The affected coating line may be operated with the affected coating booths under this construction permit until renewal or reissuance of the source's CAAPP permit addressing these new booths. This condition supersedes Standard Condition 6.

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, 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. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

| <i>Pollutant</i> | | <i>Tons/Year</i> |
|--------------------------------|--------------------|------------------|
| Volatile Organic Material | (VOM) | 100.29 |
| Sulfur Dioxide | (SO ₂) | 0.16 |
| Particulate Matter | (PM) | 1.86 |
| Nitrogen Oxides | (NO _x) | 21.88 |
| HAP, not included in VOM or PM | (HAP) | 0 |
| Total | | 124.19 |

Attachment 1 - List of Emission Units at This Source

| <i>Section</i> | <i>Emission Units</i> | <i>Description</i> |
|----------------|-----------------------|--|
| 4.1 | ShpPCS | Nordson Model Excel 2003 Powder Coating System with Internal Filters |
| 4.1 | ShpLCO | Eclipse Model 280AH Natural Gas-Fired Curing Oven (Shop Line Curing Oven) |
| 4.1 | CLPCB | Nordson Model Excel 2003 Powder Coating Booth (Cabinet Line Powder Coating Booth) |
| 4.1 | CLTUB | 2 Cabinet Line Touch-Up Booths |
| 4.1 | CLCO | Cabinet Line Curing Oven |
| 4.1 | PCSPB | Binks Powder Coating Booth (Powder Coating System Powder Booth) |
| 4.1 | PCSCO | Precision Quincy Natural Gas-Fired Curing Oven (Powder Coating System Curing Oven) |
| 4.2 | ShpLDT | Shop Line Dip Tank |
| 4.2 | HEQLDT | Home E-Quip Line Dip Tank |
| 4.2 | HEQLCO | Eclipse Model 120 AH Curing Oven (Home E-Quip Line Curing Oven) |
| 4.2 | PLDT | Post Line Dip Tank |
| 4.2 | PLCO | Eclipse Model 160 AH Natural Gas-Fired Curing Oven (Post Line Curing Oven) |
| 4.2 | ShflLDT | Shelf Line Dip Tank |
| 4.2 | ShflLCO | Eclipse Natural Gas-Fired Curing Oven (Shelf Line Curing Oven) |
| 4.3 | ShpLW | Shop Line Washer |
| 4.3 | CLW | Cabinet Line Washer |
| 4.3 | HEQLW | Home E-Quip Line Washer |
| 4.3 | PLW | Post Line Washer |
| 4.3 | ShflLW | Shelf Line Washer |
| 4.3 | PCSW | Precision Quincy Three Stage Washer (Powder Coating System Washer) |
| 4.5 | Unknown | Wood Grain Coating Systems |
| 4.5 | BCO-1 | Bayco Model BB 402 Heat Cleaning Oven (Heat Cleaning Oven) |
| 4.6 | Unknown | Building "A" two Air Make-up each at 3.2 mmBtu/hr |
| 4.6 | Unknown | Building "B" two Space Heaters each at 3.125 mmBtu/hr |
| 4.6 | Unknown | Building "B" one Space Heaters at 2.592 mmBtu/hr |

Attachment 2 - Acronyms and Abbreviations

| | |
|------------------|--|
| acfm | Actual cubic feet per minute |
| ACMA | Alternative Compliance Market Account |
| Act | Illinois Environmental Protection Act [415 ILCS 5/1 et seq.] |
| AP-42 | Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711 |
| ATU | Allotment trading unit |
| BACT | Best Available Control Technology |
| BAT | Best Available Technology |
| BTU | British Thermal Units |
| CAA | Clean Air Act [42 U.S.C. Section 7401 et seq.] |
| CAAPP | Clean Air Act Permit Program |
| CAIR | Clean Air Interstate Rule |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emission Monitoring System |
| CFR | Code of Federal Regulations |
| CISWI | Commercial Industrial Solid Waste Incinerator |
| CO | Carbon monoxide |
| CO ₂ | Carbon dioxide |
| COMS | Continuous Opacity Monitoring System |
| CPMS | Continuous Parameter Monitoring System |
| dscf | Dry standard cubic foot |
| dscm | Dry standard cubic meter |
| EAF | Electric arc furnace |
| ERMS | Emissions Reduction Market System |
| °F | Degrees Fahrenheit |
| GHG | Green house gas |
| gr | Grains |
| HAP | Hazardous air pollutant |
| Hg | Mercury |
| HMIWI | Hospital medical infectious waste incinerator |
| HP | Horsepower |
| hr | Hour |
| H ₂ S | Hydrogen sulfide |
| I.D. No. | Identification number of source, assigned by IEPA |
| IAC | Illinois Administrative Code |
| ILCS | Illinois Compiled Statutes |
| IEPA | Illinois Environmental Protection Agency |
| KW | Kilowatts |
| LAER | Lowest Achievable Emission Rate |
| lb | Pound |

Edsal Manufacturing Company, Inc.

I.D. No.: 031600BPK

Permit No.: 95120150

Date Received: 03/05/2008

Date Issued: TBD

| | |
|-------------------|--|
| m | Meter |
| MACT | Maximum Achievable Control Technology |
| mm | Million |
| mon | Month |
| MSDS | Material Safety Data Sheet |
| MSSCAM | Major Stationary Sources Construction and Modification (Non-attainment New Source Review) |
| MW | Megawatts |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO _x | Nitrogen oxides |
| NSPS | New Source Performance Standards |
| NSR | New Source Review |
| 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 |
| PM _{2.5} | Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods |
| ppm | Parts per million |
| ppmv | Parts per million by volume |
| PSD | Prevention of Significant Deterioration |
| PSEU | Pollutant-Specific Emission Unit |
| psia | Pounds per square inch absolute |
| PTE | Potential to emit |
| RACT | Reasonable Available Control Technology |
| RMP | Risk Management Plan |
| scf | Standard cubic feet |
| SCR | Selective catalytic reduction |
| SIP | State Implementation Plan |
| SO ₂ | Sulfur dioxide |
| 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 |

Attachment 3 - Contact and Reporting Addresses

| | |
|---|---|
| <p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #1</p> <p style="text-align: center;">IEPA Permit Section</p> | <p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> |
| | <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p> |
| | <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> |
| | <p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p> |
| | |
| | |
| | <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506</p> <p>Phone No.: 217/785-1705</p> |
| <p style="text-align: center;">USEPA Region 5 - Air Branch</p> | <p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604</p> <p>Phone No.: 312/353-2000</p> |

Attachment 4 - Example Certification by a Responsible Official

| SIGNATURE BLOCK | |
|---|--------------------|
| NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE. | |
| I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H)) | |
| AUTHORIZED SIGNATURE: | |
| BY: _____ | _____ |
| AUTHORIZED SIGNATURE | TITLE OF SIGNATORY |
| _____ | _____/_____/_____ |
| TYPED OR PRINTED NAME OF SIGNATORY | DATE |

Edsal Manufacturing Company, Inc.
 I.D. No.: 031600BPK
 Permit No.: 95120150

Date Received: 03/05/2008
 Date Issued: TBD