217/782-2113

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

PERMITTEE

Mitsubishi Motor Manufacturing of America, Inc.
Attn: John Applegate
100 North Mitsubishi Motorway
Normal, Illinois 61761-8099

Application No.: 95120297 I.D. No.: 113813AAE
Applicant's Designation: Date Received: December 26, 1995
Operation of: Automobile Assembly Facility
Date Issued: October 3, 2002 Expiration Date[2]: October 3, 2007
Source Location: 100 North Mitsubishi Motorway, Normal, McLean County
Responsible Official: Gary Schultz, Vice President

This permit is hereby granted to the above-designated Permittee to OPERATE an automobile assembly facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:DGP:jar

cc: Illinois EPA, FOS, Region 3

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

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

Mitsubishi Motor Manufacturing of America, Inc.
100 North Mitsubishi Motorway
Normal, Illinois 61761-8099
309/888-8000

I.D. No.: 113813AAE
Standard Industrial Classification: 3711

1.2 Owner/Parent Company

Mitsubishi Motor Manufacturing of America, Inc.
100 North Mitsubishi Motorway
Normal, Illinois 61761-8099

1.3 Operator

Mitsubishi Motor Manufacturing of America, Inc.
100 North Mitsubishi Motorway
Normal, Illinois 61761-8099

John Applegate
309/888-8712

1.4 General Source Description

The Mitsubishi Motor Manufacturing of America automobile assembly operation is located at 100 North Mitsubishi Motorway in Normal, McLean County, Illinois. The source assembles automobiles. The principal pollutant emitted is volatile organic material (VOM) from evaporation of the solvents in the coating used. In addition, the source operates several boilers/hot water heaters and the bake ovens for drying the coatings.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ED	Electrodeposition
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SCR	Stone and Chip Resistant
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

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Natural gas-fired boilers, reboilers, hot water heaters or generator, heating and ventilation or air handling units between 2.5 and 6.3 mmBtu/hr.

Gasoline storage tanks less than 3,000 gallons.

Engine wax application.

Vehicle testing.

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

None

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

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

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

3.2 Compliance with Applicable Requirements

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

Permittee shall comply with the following requirements, as applicable:

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

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.4 For each storage tank over 250 gallons that contains a VOM with a vapor pressure of 2.5 psia or greater, the tank shall be equipped with a permanent submerged loading pipe as required by 35 IAC 215.122(b).

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
1	Prime Coat: Electrodeposition (ED) Dip Tank and 3-Stage Bake Oven Bake Oven Firing Rate (All Stages Combined): 23 mmBtu/Hr	1986	ED Afterburner on Bake Oven Only
2	Guide Coat: Robotic Spray System and 3-Stage Bake Oven Bake Oven Firing Rate (All Stages Combined): 61.64 mmBtu/Hr	1980	Wet Scrubber on Spray Booth
3	Top Coat Lines 1 and 2: Each Line has Robotic and Hand Held Spray Stations and a 3-Stage Bake Oven Bake Oven Firing Rate: (All Stages from Both Top Coat Lines and Repair Line Combined): 272.8 mmBtu/Hr	1986	Wet Scrubber on Each Spray Booth. Top Coat Afterburners Nos. 1 and 2 on Bake Ovens Afterburner Firing Rates: 10 mmBtu/Hr Each
4	Top Coat Repair Spray Booth and Bake Oven	1986	Wet Scrubber on Booth
5	Plastic Parts Coating: Primer or Adhesion Promoter Spray Booth and Bake Oven followed by Color Coat and Clear Coat Spray Booths and Bake Oven Bake Oven Firing Rate: 23.3 mmBtu/Hr	1986	Wet Scrubber or Spray Booths Both Bake Ovens Vented to Plastic Parts Afterburner Afterburner Firing Rate: 3.6 mmBtu/Hr
6	Undercoat/Seal/SCR Spray Booth and Bake Oven Bake Oven Firing Rate: 3.5 mmBtu/Hr	1986	None
7	Wheelhouse Blackout (Spray) Booth	1986	None
8	Solvent Purge		None
9	Press-Weld Shop Solvents	1986	None
10	Assembly Line Solvents	1986	None
11	Cleaning Agents	1986	None
12	Cold Cleaning Degreaser	1986	None
13	Solvent Wiping	1986	None
14	Gasoline Storage Tank Nos. 3 and 4 10,000 Gallons Each	1986	Submerged Loading Pipe
15	Vehicle Fueling	1986	Vapor Balance
16	Natural Gas-Fired Boilers #1 and #2 12.5 mmBtu/Hr Each	1986	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM, NO_x and HAP emissions.

5.2 Applicable Regulations

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

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

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

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

b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Ozone Depleting Substances

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

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

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

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

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

5.2.6 Episode Action Plan

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

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

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

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

i. Illinois EPA, Compliance Section; and

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

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

5.2.7 CAM Plan

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

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 35 IAC Parts 218 or 219, because the source is not located in the Chicago or Metro-East metropolitan areas.

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	2,551.0
Sulfur Dioxide (SO_2)	1.95
Particulate Matter (PM)	41.74
Nitrogen Oxides (NO_x)	161.5
HAP, not included in VOM or PM	------
Total	2,756.15

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

a. The annual emissions from the source shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)	Underlying Rules
Particulate Matter	24.9	
Sulfur Dioxide	0.7	
Nitrogen Oxides	131	40 CFR 52.21
Volatile Organic Material	2,650	40 CFR 52.21
Carbon Monoxide	96.0	

The limits above are limitations established in Permit 80010040, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) with an adjustment made to the CO emissions to reflect new emission factors for fuel combustion. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules

for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. [T1]

b. The total heat input to the plant shall not exceed 190,000 million Btu/month.

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

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 General Records for Fuel Combustion

a. A record of the design capacity of each fuel combustion device.

b. A record of aggregate natural gas consumed by all fuel combustion devices and afterburners (mmBtu or scf per month).

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is

readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM Emissions

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

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

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Coating Operations
Control: Afterburners and Wet Scrubbers

7.1.1 Description

The word automobile when used in this permit also includes light duty trucks and sport utility vehicles (SUVs), which may or may not be produced at this source.

There are several types of coatings applied to automobiles. The prime coat is the initial coat applied to the body of the automobile by an electrodeposition (ED) process which takes place inside a dip tank, that is the entire vehicle is submersed in a water-based coating and an electric charge applied. The Permittee has an afterburner on the prime-coat baking oven but the coating would be in compliance with the applicable regulations even without the afterburner. The afterburner primarily reduces odor.

A guide coat or prime-surfacer coat is a second coat between the prime coat and top coat. There is no afterburner on the guide coat bake oven but there is a wet scrubber on the spray booth for PM removal. Some of the solvent may dissolve in the water used in the wet scrubber but the water is recycled and it is not claimed to be a VOM control device. The top coat actually consists of base coat and a clear coat, but the base coat is not baked before applying the clear coat (called liquid on liquid application). While there is only one line of automobiles through the prime coat and guide coat operations, the line divides into two for the top coat operation. Each top coat booth has a wet scrubber and the ovens are controlled by an afterburner.

The plastic parts (bumpers sometimes called fascia) coating operation uses an adhesion promoter as the first coat on parts made of polypropylene. Typical coating would not adhere to the polypropylene plastic without the adhesion promoter. For fascia made from a reaction plastic a conductive primer is used. This operation also has an afterburner on the oven. The guide coat uses robotic spray applicators, the top coat uses a combination of robotic and hand-held spray applicators and the plastic parts has hand-held spray applicators.

There are other specialty coatings applied, usually between the prime coat and top coat. These include an undercoating, a seal coating, and a stone and chip resistant coating. A blackout paint for the wheel wells is applied after the topcoat. These coatings contain low

amounts of VOM and since applied to a small area only a slight amount of PM is generated.

These are both state emission standards (35 IAC) and federal NSPS (40 CFR 60) for automobile coating. Each standard has a different method for measuring compliance. The state standard is in pounds of VOM emitted per gallon of coating used. The gallon is measured as if there were no water present (if water is present in the coating). Credit may be taken for control equipment, i.e., the afterburner.

Compliance with the NSPS is determined as pounds of VOM emitted per gallon of applied coating solids. When measured this way, coatings in which a high percent of the coating actually adheres to the auto body (i.e., less overspray, usually measured by a factor called transfer efficiency) may contain more VOM and still comply. Credit may also be taken for control equipment. Prime coats have low emissions standards because the solvent is primarily water and since it is applied in a dip tank the transfer efficiency is a high 90%.

The solvent purge is a process associated with the guide coat, top coat, and plastic coating lines. The same spray head is used for each color and thus when a color change is made the coating in the spray head must be purged with solvent to clean out the old color. Even if the color is not changed the spray head is purged every 10 to 15 vehicles as coating accumulates at the fine spray head discharge point and may come out as a glob if not purged. The purge solvent is sprayed into an enclosed container and then sent offsite to be distilled and returned. There is no specific emission standard for this type of process, but permit condition specifies work practices to minimize emissions.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
1	Prime Coat: Electrodeposition (ED) Dip Tank and 3-Stage Bake Oven Bake Oven Firing Rate (All Stages Combined): 23 mmBtu/Hr	ED Afterburner on Bake Oven Only
2	Guide Coat: Robotic Spray System and 3- Stage Bake Oven Bake Oven Firing Rate (All Stages Combined): 61.64 mmBtu/Hr	Wet Scrubber on Spray Booth

Emission Unit	Description	Emission Control Equipment
3	Top Coat Lines 1 and 2: Each Line has Robotic and Hand Held Spray Stations and a 3-Stage Bake Oven Bake Oven Firing Rate: (All Stages from Both Top Coat Lines and Repair Line Combined): 272.8 mmBtu/Hr	Wet Scrubber on Each Spray Booth. Top Coat Afterburners Nos. 1 and 2 on Bake Ovens Afterburner Firing Rates: 10 mmBtu/hr Each
4	Top Coat Repair Spray Booth and Bake Oven	Wet Scrubber on Spray Booth
5	Plastic Parts Coating: Primer or Adhesion Promoter Spray Booth and Bake Oven followed by Color Coat and Clear Coat Spray Booths and Bake Oven Bake Oven Firing Rate: 23.3 mmBtu/Hr	Wet Scrubber or Spray Booths Both Bake Ovens Vented to Plastic Parts Afterburner Afterburner Firing Rate: 3.6 mmBtu/Hr
6	Undercoat/Seal/SCR Spray Booth and Bake Oven Bake Oven Firing Rate: 3.5 mmBtu/Hr	None
7	Wheelhouse Blackout (Spray) Booth	None
8	Solvent Purge	None

7.1.3 Applicability Provisions and Applicable Regulations

a. The “affected coating lines” for the purpose of these unit-specific conditions, are coating lines used to coat automobiles/light duty trucks/SUVs and identified in Condition 7.1.2.

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

c. The coating lines, excluding the plastic parts and wheelhouse blackout, are subject to an NSPS, 40 CFR 60 Subpart MM, for automobile and light duty truck surface coating operations. The specific standards are as follows:

i. Prime Coat: 1.33 lb VOM/gal of applied coating solids (0.16 kg VOM/liter of applied coating solids.

ii. Guide Coat: 11.67 lb VOM/gal of applied coating solids (1.4 kg VOM/liter of applied coating solids.

iii. Top Coat: 12.26 lb VOM/gal of applied coating solids (1.47 kg VOM/liter of applied coating solids.

Top coat repair coating must be included in the top coat calculation.

The above standards also represent BACT. However, there is an alternate standard in Attachment 2. [T1]

d. The coating lines, excluding the plastic parts and wheelhouse blackout, are subject to 35 IAC 215.204(a)(2). These standards are measured as pounds of VOM emitted per gallon of coating excluding water.

		lb/gal	kg/liter
i.	Prime Coat	1.2	0.14
ii.	Prime Surface Coat	2.8	0.34
iii.	Top Coat	2.8	0.34
iv.	Final Repair Cost	4.8	0.58

e. Each coating operation is subject to 35 IAC 212.321. This rule limits PM emissions and is written out in Attachment 1. For coating operations the process weight is the weight of the coating.

f. The bake ovens used on several of the coating lines identified in Condition 7.1.2 are classified as fuel combustion emission units and are subject to 35 IAC 216.121 which limits CO emissions to 200 ppm, corrected to 50 percent excess air. This applies to units with a heat input greater than 10 mmBtu/hr.

g. Malfunction and Breakdown Provisions

Since the afterburners are not required to comply with Condition 7.1.3(c)(i) or (d)(i), in the event of malfunction or breakdown of the afterburner, the coating line is not required to be shut down.

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected air heaters which heat the air used in the bake ovens not being subject to 40 CFR 60 Subpart Dc, standards for small industrial steam generating units because the

air heaters were constructed prior to the applicability date of June 9, 1989. Note that they are included in the definition of steam generating units because the definition applies to heating any heat transfer medium, not just turning water into steam.

b. This permit is issued based on the affected air heaters which heat the air used in the bake ovens not being subject to 35 IAC 217.121 because the heat input for each unit is less than 250 mmBtu/hr.

c. This permit is issued based on the affected prime coat, undercoat/seal coat/SCR line, and the wheelhouse blackout booth not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected units do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Control and Operational Requirements

a. The wet scrubber and afterburners shall be operated so as to achieve compliance with Condition 7.1.3(c), (d) and (e) or the alternate standard in Attachment 2 for top coat.

b. Real transfer efficiency, i.e. the transfer efficiency determined using the methods and procedures specified elsewhere in this permit as applied to the Permittee's operations, shall be used to comply with the above limits, provided however that the following assumptions shall be made:

i. 90 % transfer efficiency for the prime operation if coating is applied by an electrodeposition (EDP) system, and

ii. 76% transfer efficiency for the guide (second) coat operation if at least 95% of the coating is applied by robotic or automatic electrostatic sprays.

c. The organic material emission from the two main top coat ovens shall be controlled by afterburners, with at least 90% destruction efficiency. The top coat afterburners shall be operated year-round unless operation during only the ozone season (April 1 to October 31 of each year) is permissible within USEPA's present or future written policy for Best Available Control Technology. In such case and if the top coat afterburners are not operated during other times, compliance determinations shall be made

relying on the demonstrated performance of the afterburners when their operation was required.

d. This permit is issued based upon prime oven afterburner being operated year-round for odor control. The afterburner shall not be used for the purpose of determining compliance with the VOM limitations in Condition 7.1.3(c)(i).

e. The emissions of organic material from certain other coating operations and processes not addressed by Condition 7.1.5(b) to (d) which are also subject to BACT shall not exceed the limits specified in Attachment 3.

f. The organic material emission from the Plastic Parts Coating Ovens shall be controlled by afterburner(s) with at least 90% destruction efficiency. The afterburner(s) shall be operated year-round unless operation during only the ozone season (April 1 to October 31 of each year) is permissible within USEPA's present or future written policy for Best Available Control Technology.

g. Automobile body painting shall be scheduled to minimize color changes and associated purging of coating applicators, consistent with other constraints on scheduling.

Conditions 7.1.5(b) through (g) represent the application of BACT as required by the Prevention of Significant Deterioration regulations as previously established in Permit 86010040. [T1]

h. At all times, including periods of startup, shutdown and malfunction, the Permittee shall also, to the extent practicable, maintain and operate the automobile body coating operations, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 60.11(d)]

i. The particulate matter emissions from coating overspray shall be controlled by waterwalls (wet scrubbers), filters or other devices with at least 98% efficiency, except in the off-black and minor repair spray booth where at least 86% efficiency shall be achieved, and in the touch up and rustproofing (underfloor and engine wax coating) booth where at least 75% efficiency shall be achieved.

j. The particulate matter emissions from any production welding and grinding operations which are vented

shall be controlled by fabric filter or electrostatic precipitation devices prior to discharge to either the outside or the work area air. This condition does not apply to plant maintenance operations.

k. Natural gas shall be the only fuel used in fuel combustion emission device and as supplemental fuel for the afterburners.

7.1.6 Emission Limitations

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

a. Annual emissions of organic material from any individual coating operation or other process operation, excluding any emissions attributable to fuel combustion, shall not exceed the amount specified in Attachment 4. [T1]

b. Hourly particulate matter emissions from any individual item of equipment or operation, excluding any emissions attributable to fuel combustion, shall not exceed the numerical limits specified by Attachment 5. [T1]

c. i. Organic material emissions in a normal working day of any individual item of equipment or operation listed in Attachment 5, excluding any emissions attributable to fuel combustion, shall not exceed the numerical limits specified in Attachment 5. For purposes of this condition a normal working day is two 8-hour shifts, producing a maximum of 997 automobiles. Compliance with limits may be determined from a combination of daily production data and monthly material usage data.

ii. A. The hourly input capacity of fuel burners for any individual item of equipment or operation listed in Attachment 5 shall not exceed the numerical limit in Attachment 5.

B. The total hourly heat input capacity of fuel burners for equipment or operations not listed in Attachment 5, e.g., boilers, space heaters, door heaters, etc. shall not exceed 173 million Btu/hour.

d. i. VOM content and emissions of VOM from the primary adhesion promoter coating booths and touchup booth combined shall not exceed the following:

VOM Content (Lb/Gal)	VOM Emissions (Ton/Mo)	(Ton/Yr)
6.5 (Primary Booth) 7.0 (Touchup Booth)	10.6	105.6

ii. VOM emissions from the adhesion promoter and plastic parts primer combined shall not exceed 128.0 ton/yr, and primer by itself shall not exceed 115.0 ton/yr.

e. i. If VOM emissions from plastic parts primer and adhesion promoter combined were under 110 ton/yr the previous calendar year, compliance with annual emissions limit in Condition 7.1.6(d)(ii) shall be determined from a running total of four quarters of data.

ii. If VOM emissions from plastic parts primer and adhesion promoter combined were over 110 ton/yr the previous calendar year, compliance with annual emissions limit in Condition 7.1.6(d)(ii) shall be determined from a running total of 12 months of data.

f. i. VOM content and emissions of VOM from the wheelhouse black booth shall not exceed the following:

VOM Content (Lb/Gal)	VOM Emissions (Lb/Mo)	(Ton/Yr)
0.7	700	3.5

ii. VOM content of the blackout booth coating excluding water shall not exceed 2.8 lb/gal pursuant to 35 IAC 214.204(a)(2).

iii. Emissions of particulate matter (PM) from the blackout booth shall not exceed 0.55 lb/hr and 1.2 ton/yr.

iv. In Attachment 4 emissions from the blackout booth are included under top coat.

The above limitations were established in Permit 86010040, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the

aforementioned permit does not constitute a new major source of PM [T1].

7.1.7 Testing Requirements

a. Upon request by the Illinois EPA, any of the afterburners that are required to comply with Condition 7.1.2 shall be tested to determine destruction efficiency and inlet VOM emission rate. The test methods shall be conducted, documented and reported in accordance with the NSPS, 40 CFR 60.8, 60.393 and 60.396.

b. Upon request by the Illinois EPA, the transfer efficiency of any of the booths shall be measured in order to verify an input value for determining compliance with emissions on an applied coating solids basis

c. Upon request by the Illinois EPA the Permittee shall conduct performance tests for PM emissions or control device efficiency in accordance with the appropriate test methods in 40 CFR 60 Appendix A.

d. Each container of coating received from the supplier shall include an analysis of VOM content determined using USEPA method 24 or 24A or from formulation information.

7.1.8 Monitoring Requirements

Each of the afterburners shall be equipped with a monitor to measure the combustion chamber temperature. (40 CFR 60.394)

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating process to demonstrate compliance with Conditions 5.5.1, 7.1.5, 7.1.6, and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

a. Afterburner combustion chamber temperature (a continuous record of when operating normally, a log of when vehicles not being produced, and a log of when combustion chamber was operating below specified temperature and vehicles were being produced).

b. Vehicles produced.

c. VOM content of each container of coating received and solids content of top coats.

d. Records of all emission tests performed including transfer efficiency tests.

e. Any record required to demonstrate compliance with Attachments 2 through 5.

f. A monthly record of demonstration of compliance with the NSPS, Condition 7.1.3(c).

g. VOM, PM, NO_x and SO_2 emissions (lb or ton/mo).

7.1.10 Reporting Requirements

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

a. Any exceedance of an NSPS limit.

b. Operation of a coating line when the temperature in afterburner combustion chamber is not adequate to achieve required destruction efficiency.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

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

The actual coatings may be changed (i.e., new colors) provided that emissions continue to comply with Condition 7.1.3, 7.1.5 and 7.1.6.

7.1.12 Compliance Procedures

a. Compliance with the applicable regulations in Condition 7.1.3 and emission limitations in Condition 7.1.6 shall be based on operating within the requirements of Condition 7.1.5, monitoring the operation as required by Condition 7.1.8 and the recordkeeping and reporting requirements of Conditions 7.1.9 and 7.1.10 and the calculations to follow or other approved calculations using USEPA methodology.

b. Prime Coat (Electrodeposition) Emission Calculations

i. Emissions VOM (lb/mo) = Resin usage (gal/mo) times VOM content of resin (lb VOM/gal) + Paste usage (gal/mo) times VOM content of paste (lb VOM/gal)

ii. Emission rate[a] (lb/gal of applied coating solids) = (i) above divided by [Resin usage (gal/mo) times (% volume solids/100) + Paste usage (gal/mo) times (% volume solids/100)]

[a] This calculation may be done in metric units.

Note that no credit for an emission reduction is given for the afterburner on the base oven of the prime coat line.

c. Guide Coat Emission Calculations

i. Emissions VOM (lb/mo) = $\sum_{i=1}^{n}$ [Guide coat usage (gal/mo) times VOM content (lb/gal)] + [Diluent solvent usage (gal/mo) times diluent density (lb/gal)]

Where n = Number of different coatings

ii. Applied coating solids (gal) = $\sum_{i=1}^{n}$ [Guide coat usage (gal/mo) times (volume % solids/100)] times transfer efficiency (%/100)

iii. Emission rate[a] (lb/gal of applied coating solids) = (i) divided by (ii) above

[a] This calculation may be done in metric units

d. Top Coat Emission Calculations

This is a complex calculation generally done by spread sheet values and computer calculations involving the following variables:

Coating usage by color percent volume solids and VOM content, diluent solvent usage and density, repair coating usage, percent volume solids and VOM content, transfer efficiency for each type of base coat, clear coat and repair coat, color change rate (%), percent of VOM carried through to the bake oven (assumed to be 20%) and bake oven afterburner destruction efficiency.

e. Plastic Parts Coating Emission Calculations

VOM Emissions (lb/mo) =Coating usage (gal/mo) times VOM content (lb/gal) times (1-[capture efficiency (%/100)] times [destruction efficiency (%/100)]

f. Other Uncontrolled Coatings

VOM Emissions (lb/mo) =Coating usage (gal/mo) times VOM content (lb/gal)

g. Loss from Solvent Purge

Material balance calculation

7.1.13 Compliance Schedules

a. The Illinois EPA has determined that top coat VOM content is not in compliance with 35 IAC 215.204(a)(2). Therefore, the permit shield in Section 8.1 does not shield the Permittee from possible enforcement actions initiated by either USEPA or the Illinois EPA involving the above named emission units or activities. Compliance with the terms of this permit does not serve as proof of compliance for the coating lines. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such enforcement action or other outstanding issue initiated pursuant to the alleged noncompliance with 35 IAC 215.204(a)(2) (e.g., include a new compliance schedule, identify appropriate applicable requirements and establish new requirements.

b. The Permittee shall comply with the following schedule of compliance to address compliance with the alleged violations of 35 IAC 215.204(a)(2):

Milestone	Timing
The Permittee shall achieve full compliance with all requirements resulting from resolution of enforcement issues regarding the alleged noncompliance with 35 IAC 215.204(a)(2)	No later than any schedule established pursuant to resolution of any pending or future enforcement action pertaining to the alleged noncompliance with 35 IAC 25.204(a)(2)

c. Submittal of Progress Reports

The Permittee shall submit quarterly reports on the status of actions taken to achieve compliance.

d. The Permittee shall submit a written notification to the Illinois EPA Compliance Section within 15 days of coming into full compliance with 35 IAC 215.204(a)(2).

7.2 Unit: Other Process Emission Units
Control: None

7.2.1 Description

This section covers emission units other than coating and fuel combustion. The emissions here are also primarily VOM as various solvents are used throughout the assembly process. Some solvents are for cleaning or wiping the automobile; another example is that a sealant used to install the front and back windows contains a solvent.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
9	Press-Weld Shop Solvents	None
10	Assembly Line Solvents	None
11	Cleaning Agents	None
12	Cold Cleaning Degreaser	None
13	Solvent Wiping	None
14	Gasoline Storage Tank Nos. 3 and 4 10,000 Gallons Each	Submerged Loading Pipe
15	Vehicle Fueling	Vapor Balance or Onboard Refueling Vapor Recovery

7.2.3 Applicability Provisions and Applicable Regulations

a. An “affected other emission unit” for the purpose of these unit-specific conditions, is an operation employed during assembly of an automobile and identified in Section 7.2.2.

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

c. Emission units 9 to 13 are subject to 35 IAC 215.301. This rule limits VOM emissions to 8 lb/hr, if photochemically reactive pursuant to the definition in 35 IAC 211.4690, or 85% as allowed by § 215.302. Since there is no control equipment in used, emissions must be below 8 lb/hr. Note that each unit identified in Condition 7.2.2 may include more than one emission unit as listed, regulated by § 215.301. Assembly solvent used for one operation along the assembly line would be one unit and another solvent used somewhere else along the assembly line would be another unit.

d. The cold cleaning degreaser is subject to 35 IAC 215.182. This rule states that no person shall operate a cold cleaning degreaser unless:

i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights, or a powered system if:

A. The solvent vapor pressure is greater than 15 mmHg or 0.3 psi measured at 100°F;

B. The solvent is agitated; or

C. The solvent is heated above ambient room temperature.

ii. The degreaser is equipped with a facility for draining cleaned parts. The drainage facility shall be constructed so that parts are enclosed under the cover while draining unless:

A. The solvent vapor pressure is less than 32 mmHg or 0.6 psi measured at 100°F; or

B. An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.

iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 32 mmHg or 0.6 psi measured at 100°F or if the solvent is heated above 120°F or its boiling point:

A. A freeboard height of 7/10 of the inside width of the tank or 36 in, whichever is less; or

B. Any other equipment of system of equivalent emission control as approved by the Illinois EPA. Such a system may include a water cover, refrigerated chiller or carbon adsorber.

iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and

v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray. [35 IAC 215.182(b)]

e. An “affected tank”, for the purpose of these unit-specific conditions, is a storage tank that is only subject to 35 IAC 215.122(b). The affected gasoline storage tank is subject to the requirements of 35 IAC 215.122(b) because the tank has a capacity greater than 250 gallons and is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected units do not use an add-on control device to achieve compliance with an emission limitation or standard, uses a passive control measure, such as a submerged loading pipe, that is not considered a control device because it acts to prevent the release of pollutants, or uses a passive control measure, such as low vapor pressure solvents, that is not considered a control device because it acts to prevent the pollutants from forming.

b. This permit is issued based upon the cold cleaning degreaser not being subject to 40 CFR 63 Subpart T because the degreaser does not use halogenated solvents.

7.2.5 Operational Requirements

a. i. The organic material emissions form the gasoline storage tanks, including any tanks classified as insignificant emission units, and vehicle fueling shall be controlled by use of “Stage 1” and “Stage 2” vapor balance/transfer systems.

ii. As an alternative to a “Stage II” vapor balance/transfer system, the organic material emission from vehicle fueling may be controlled by Onboard Refueling Vapor Recovery (ORVR) system installed on each new vehicle.

Condition 7.2.5(a) represents the application of BACT as required by the PSD regulations (40 CFR 52.21) as set by Conditions in Permit 86010040.

b. Each affected gasoline storage tank shall be equipped and operated with a permanent submerged loading pipe, pursuant to 35 IAC 215.122(b). (The Illinois EPA has not approved use of other equivalent equipment in lieu of a permanent submerged loading pipe.)

c. No person shall operate a cold cleaning degreaser unless:

i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere;

ii. The cover of the degreaser is closed when parts are not being handled; and

iii. Parts are drained until dripping ceases.

d. The solvent used in the cold cleaning degreaser shall not be a halogenated solvent.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected emission unit(s) are subject to the following:

The limits for all processes at the assembly including those in Condition 7.2.2, were referenced in Section 7.1 of this permit and are listed in Attachments 2, 3, 4 and 5. These conditions were established in Permit 86010040.

7.2.7 Testing Requirements

None

7.2.8 Inspection and Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected unit to demonstrate compliance with Conditions 5.5.1, 7.2.5 and appropriate parts of Attachments 2, 3, 4 and 5, pursuant to Section 39.5(7)(b) of the Act:

a. Design information for the tank showing the presence of a permanent submerged loading pipe;

b. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe;

c. Usage of solvents on each process listed in Condition 7.2.2 or throughput of gasoline for the storage tank or vehicle fueling. Solvents will be assumed to be 100% unless a record indicating otherwise is kept. The HAP content of the material must also be kept (lb or gal/mo and year);

d. If credit is claimed for materials returned for recycling, then records of the usage and VOM content of the recycled materials shall be kept; and

e. VOM and HAP emissions from each emission unit. If the unit is subject to Condition 7.2.3(c), the material is photochemically reactive, and the emission rate exceeds 8 lb/hr then any records that indicate the unit consisted of more than one operation, each of which could be claimed as a unit, shall be kept (lb or ton/mo and year).

f. A record showing that the solvent used in the cold cleaning degreaser is not a halogenated solvent.

7.2.10 Reporting Requirements

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

a. Any storage of VOL in an affected gasoline storage tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.2.5(b), e.g., no “permanent submerged loading pipe”, within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

b. Any storage of VOL in an affected gasoline storage tank that is out of compliance with the control requirements (Condition 7.2.5(b)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-

compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

c. Use of a solvent in the cold cleaning degreaser that does not comply with Condition 7.2.3(d).

d. Emissions exceeding the allowable in Attachment 2 through 5 as applicable to the equipment in Condition 7.2.2.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

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

The solvents or cleaning agents used in equipment listed in Condition 7.2.2 may be changed provided the unit continues to comply with Conditions 7.2.3(c), 7.2.5 and 7.2.6 (Attachments 2 through 5).

7.2.12 Compliance Procedures

a. Compliance with Conditions 7.2.3, 7.2.5 and 7.2.6 shall be determined from the recordkeeping requirements of Condition 7.2.9 and the reporting requirements of Condition 7.2.10.

b. For all emission units except the gasoline tank and vehicle fueling, all solvent used, less any amount recycled, will be assumed to be emitted.

7.3 Unit: Two Natural Gas-Fired Boilers

7.3.1 Description

Two natural gas-fired boilers are being operated. Both boilers are just above 10 mmBtu/hr. Although “boiler” implies heating water to produce steam, these units simply act as hot water heaters, although the temperature of the water may be above the normal boiling point of water.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
16	Natural Gas-Fired Boilers #1 and #2 12.5 mmBtu/hr – Each	None

7.3.3 Applicability Provisions and Applicable Regulations

a. i. An “affected boiler” for the purpose of these unit-specific conditions, is each boiler listed in Condition 7.3.2.

ii. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.

b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from Boilers B2, B3 and B5 to exceed 200 ppm, corrected to 50 percent excess air on a per boiler basis [35 IAC 216.121].

7.3.4 Non-Applicability of Regulations of Concern

a. The affected boilers are not subject to NSPS, 40 CFR 60 Subpart D, Small Industrial-Commercial-Institutional Stem Generating Units, since each steam generating unit was constructed, modified, or reconstructed prior to June 9, 1989 which is the applicability date.

b. The affected boilers are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of the boilers is less than 73.2 MW (25 mmBtu/hr).

c. The affected boilers are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.303, Fuel Combustion Emission Sources, which excludes the affected boilers from this requirement.

7.3.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected boilers.

7.3.6 Emission Limitations

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

N/A

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

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

a. Source fuel usage (ft^3/yr); and

b. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.3.12 (ton/yr).

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected boiler with the permit requirements within 309 days of the violation, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

a. Compliance with Condition 7.3.3(b) is assumed to be achieved by the work practices inherent in operation of a natural gas-fired boiler, thus no compliance

procedures are set in this permit addressing this regulation.

b. To determine compliance with Condition 5.5.1 emissions from the natural gas fired equipment shall be based on the emission factors listed below:

Pollutant	Natural Gas Emission Factors for Boilers ($lb/10^6\ ft^3$)
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in boilers, Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement D, September 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, ft^3) x (The Appropriate Emission Factor)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after August 18, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

   i. Describe the physical or operational change;

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

   iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

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

   v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

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

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

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

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

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

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

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

8.6.3 Test Reports

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

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

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

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

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

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Allowable Emissions of Particulate Matter

Process Emission Units for Which Construction or Modification Commenced on or After April 14, 1972 [35 IAC 212.321(b)].

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

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

Where:

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

a. For process weight rate up to 450 ton/hour:

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

b. For a process weight rate under 100 lb/hr (0.05 ton), the allowable is 0.55 lb/hr.

10.2 Attachment 2: Best Available Control Technology for Topcoat Operation

ALTERNATIVE OPERATING STANDARDS

Parameter	Top
Average Solids Content of All Coating (Volume %, Less Water)	Solid Color 51% Base Coat 42% Clear Coat 54%
Overall Actual Transfer	60%
Afterburner Destruction Efficiency (%)	95%

Note: The requirement for operation of afterburners from November 1 of one year to March 31 of the next year to meet the top coat standard is addressed by Condition 7.1.5(c).

10.3 Attachment 3: Best Available Control Technology for Volatile Organic Material (VOM) for Operations Not Covered by Condition 7.1.5(b) to (d)

Area/Operation	Coating Quality (kg VOM/1 ctg)	Emission Other
Body Paint Shop:		
Seal/Undercoat/Stoneguard	0.067	
Assembly Line:		
Miscellaneous Coatings[5]	-----	0.06 lb/Vehicle
Check and Repair:		
Touch Up Coating	0.58[6]	
Under Floor Rustproofing	0.37	-----
Gasoline Tank(s)	-----	[1]
Vehicle Fueling	-----	[2]
Plastic Parts Paint Shop:		
Primer	0.63[3]	
Color Coat	0.58[3]	
Clear Coat	0.53[3]	
Solvent Purge and Clean-Up:		1.8 lb/Vehicle[4]

Notes:

[1] Control by "Stage 1 Vapor Balance System.

[2] Control by "Stage 2 Vapor Balance System.

[3] Limits are uncontrolled emission; oven exhausts of the plastic parts shop must also be controlled by an afterburner, see Condition 7.1.5(f).

[4] Solvent purge and clean-up covers use of solvent or VOM containing material for nonproduction purposes, e.g., purging of applicators, cleaning of applicators, cleanup of spray booths, in the body paint shop and plastic parts paint shop. It does not cover wiping or cleaning of automobile bodies or parts prior to coating. Solvent purge and cleanup must also be controlled by the measures specified in Conditions 7.1.5(c).

[5] Miscellaneous coatings include all coatings, adhesives, primers, etc., applied during automobile assembly, other than materials associated with installation of glass and solvents used for wiping automobile surfaces, e.g. wiping prior to application of a body side molding adhesive.

[6] Limit applies to touch-up coatings applied to assembled vehicles to repair damage during assembly, which coatings are not included in the demonstrations of compliance for the automobile body top coat operation.

10.4 Attachment 4: Annual Volatile Organic Material Limits for Coating and Process Operations (Ton/Year)

Press-Weld Shop:		
Misc. Coatings/Solvent		40.0
Body Paint Shop:		
Prime Coat		104.0
Undercoat/Seal/SCR		108.0
Guide (Second) Coat		450.0
Solvent Wiping	43.0	
Top Coat, Including Touch Up and Blackout		897.9
Total		1,602.9
Assembly Line:		
Glass Installation		18.7
Wiping Solvent		11.8
Other		7.3
Total		37.8
Check and Fueling		
Underfloor Coating		153
Engine Wax		1.9
Gasoline Tank(s) & Vehicle Fueling		4.6
Transit Wax		0.1
Total		159.6
Plastic Parts Paint Shop:		
Primer		115.0
Adhesion Promoter		105.6
Primer and Adhesion Promoter Combined		128.0
Color and Clear Coat		281.0
Total	409.0	
Solvent Purge and Clean Up:		
Purge Solvent		196.6
Cold Cleaner		3.2
Other Solvent Use		0.1
Cleaning Agents		89.4
Total		289.3
Grand Total:		2,538.6

10.5 Attachment 5: Limitations for Equipment and Operations

Area/Operation or Process Equipment	Particulate Matter Emissions[3] (Lb/Hr)	Volatile Organic Material Emissions (Lb/Day)	Total Heat Input (mmBtu/Hr)
Press-Weld Shop:			
Misc. Coatings/Solvent	Neg.[1]	340	---[2]
Arc Welders	1.35	---	---
Grinding	1.60	---	---
Body Paint Shop:			
Prime	Neg.	860[4]	23.0
Undercoat/Seal/SCR	Neg.	900	3.5
Guide (Second) Coat	1.00	3,730	61.6
Solvent Wiping	----	360	----
Top Coat and Touch Up	3.37	8,200[4]	175.4
Wet Sand/Dry	Neg.	---	1.5
Total		14,630	
Assembly Line:			
Glass Installation	---	155	----
Wiping Solvent	---	100	----
Other(6)	Neg.	60	----
Total		315	
Check & Fueling Area:			
Touch Up Coating[7]	---	---	4.1
Vehicle Fueling	---	12	----
Underfloor Rustproof	Neg.	1,270	----
Engine Wax	0.06	70	----
Transit Wax	Neg.	Neg	----
Total		1,352	
Plastic Parts Paint Shop:			
Primer	0.51	1,050[4]	[5]
Color/Clear Coat	1.75	2,565[4]	[5]
Total		3,615	
Solvent Purge and Clean Up:			
Purge Solvent	---	1,500[8]	----
Cold Cleaner	---	535 lb/month[8,9]	----
Other Solvent Use	---	Neg.[8]	----
Cleaning Agents	--	3438 lb/week	----

Attachment 5 - Notes:

(1) "Neg.:" designate negligible emissions, that is less than 100 lbs/year

(2) "_" designates limit not applicable as relevant type of operation not present.

(3) Individual emission sources within the operation must also comply with 35 IAC 212.321.

(4) Emissions prior to control equipment.

(5) Total heat input to the Plastic Parts Shop is limited to 21.2 million Btu/hr

(6) Other includes all coatings, adhesives, primers, etc., other than materials associated with installation of glass and solvents used for wiping automobile surfaces, e.g. wiping prior to application of a bodyside molding adhesive.

(7) Limits apply to touch-up coatings applied to assembled vehicles to repair damage during assembly, which coatings are not included as part of the automobile body topcoat operation.

(8) Emissions after control measures.

(9) Compliance determined annually.

10.6 Attachment 6 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.7 Attachment 7 - Guidance on Revising This Permit

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

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

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

1. Administrative Permit Amendment

- Corrects typographical errors;

- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

- Requires more frequent monitoring or reporting by the Permittee;

- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or

- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

- Are not modifications under any provision of Title I of the CAA;

- Are not required to be processed as a significant permit modification; and

- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- The source’s suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. <u>Significant Permit Modification</u>

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;

- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

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

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

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

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

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

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

Application For Construction Permit (For CAAPP Sources Only)	**For Illinois EPA use only**
	I.D. number:
	Permit number:
	Date received:

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

Source Information		
1. Source name:		
2. Source street address:		
3. City:		4. Zip code:
5. Is the source located within city limits?		☐ Yes ☐ No
6. Township name:	7. County:	8. I.D. number:

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

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

Applicant Information	
19. Who is the applicant? ☐ Owner ☐ Operator	20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

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

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

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

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

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

10.9 Attachment 9 Guidance on Renewing This Permit

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

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

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.

3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.

4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.

5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.

6. Information addressing any outstanding transfer agreement pursuant to the ERMS.

7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official’s signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.

9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

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

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

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

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

Mail renewal applications to:

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