DRAFT CAAPP PERMIT
July 14, 2008

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Intertape Polymer Group
Attn: Craig A. Hoedel
2200 North McRoy Drive
Carbondale, Illinois 62901

I.D. No.: 077015ABX
Application No.: 95090099

Date Received: June 12, 2006
Date Issued: TO BE DETERMINED
Expiration Date: TO BE DETERMINED

Operation of: Tape Coating Plant
Source Location: 2200 North McRoy Drive, Carbondale, Jackson County, 62901
Responsible Official: Craig A. Hoedel, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a Tape Coating Plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

ECB:AB:psj

cc: Illinois EPA, FOS, Region 3
CES
Lotus Notes

[1] Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Intertape Polymer Group
2200 North McRoy Drive
Carbondale, Illinois 62901
618/529-0300

I.D. No.: 077015ABX
County: Jackson
Standard Industrial Classification: 2672, Paper and Allied Products

1.2 Owner/Parent Company

Intertape Polymer Corp.
3647 Cortez Road West
Bradenton, Florida 34210

1.3 Operator

Intertape Polymer Group
2200 North McRoy Drive
Carbondale, Illinois 62901

Craig Hoedel
618/529-0300

1.4 Source Description

The Intertape Polymer Group is located at 2200 North McRoy Drive in Carbondale, Illinois. The source manufactures a variety of consumer and industrial tapes. Tapes are made by applying an adhesive mixture to a substrate, such as paper or film.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
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
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
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
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 CONDITIONS FOR 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:

Two 10,000 Gallon Each Toluene Storage Tanks
Two 10,000 Gallon Solvent Reclaim Storage Tanks
Nine 2,000 Gallon Adhesive Storage Tanks
Mixers
Totes

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)].

Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or blended contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].

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

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

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

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

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 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 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 (see Attachment 2) and 35 IAC Part 266. 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.

3.2.2 For each organic material emission unit operated without any control device(s) 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, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

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

Description	Date Constructed	Emission Control Equipment	Subsection of this Permit
Coating Lines	1994	SRS, Thermal Oxidizer	7.1
Boilers	1994	None	7.2
Air Stripper	1996	SRS	7.3

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

5.2 Area Designation

5.2.1 This source is located in an area that is designated as attainment for all criteria pollutants.

5.3 Source-Wide Applicable Provisions and Regulations

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

5.3.2 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.

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

5.3.3 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.

5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 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 RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B 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 Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.3.6 Episode Action Plan

a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, 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 and is incorporated by reference into this permit.

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

or emergency be declared by the Director of the Illinois EPA or his or her designated representative.

c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there are terms for unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	201.00
Sulfur Dioxide (SO_2)	---
Particulate Matter (PM)	8.00
Nitrogen Oxides (NO_x)	48.00
HAP, not included in VOM or PM	---
Total	257.00

5.6.2 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.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, 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.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by

Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 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.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.10.3 Semiannual Compliance and Monitoring Reporting

See Conditions 7.1.10 and 8.6.1 for further details.

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

5.12 Source-Wide Compliance Procedures

5.12.1 General Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be based on the recordkeeping and reporting requirements of

Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

Not applicable to this source

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Coating Lines

7.1.1 Description

These coating lines are used to apply an adhesive mixture to a substrate, such as paper or film to make consumer and industrial tapes. These coating lines can apply solvent-based formulas. Emissions of VOM result from the coating of solvent based formulas. The release station of Coating Line 44 is vented to the solvent recovery system (SRS) – a carbon system with three carbon beds. The hot melt station on coating line 44 is not vented to a pollution control device because applied coatings are 100% solids. The bulk of the solvent laden air from coating lines 51 and 52 is ducted to the SRS. The remaining solvent laden air from the final drying ovens is ducted to the thermal oxidizer. These coaters can also apply hot-melt (coating line 44) and water-based coatings (coating line 51 and 52).

After the substrate is coated, it is dried in a series of ovens. Coating line 51 utilizes direct natural gas fired ovens or indirect steam heated ovens. Coating lines 44 and 52 have ovens, which are heated indirectly with hot oil and steam.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coating Line 44	Hot Melt and Solvent Paper and Film Coating	1994	SRS
Coating Line 51	Hot Melt and Solvent Paper and Film Coating	1994	SRS and/or Thermal Oxidizer
Coating Line 52	Hot Melt and Solvent Paper and Film Coating	1994	SRS and/or Thermal Oxidizer

7.1.3 Applicable Provisions and Regulations

a. The "affected coating line" for the purpose of these unit-specific conditions, is the coating operation identified in Conditions 7.1.1 and 7.1.2.

b. The affected coating lines are subject to 35 IAC 212.321(a), as defined in 35 IAC 266.105 and 266.115, which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which,

either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

c. The affected coating lines are subject to the NSPS for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60 Subparts A and RR. The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.

   i. The owner or operator shall cause the discharge into the atmosphere from an affected coating line not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month [40 CFR 60.442(a)(1)]; or

   ii. The owner or operator shall demonstrate for each affected coating line:

      A. A 90 percent overall VOC emission reduction as calculated over a calendar month [40 CFR 60.442(a)(2)(i)]; or

      B. The percent overall VOC emission reduction specified in 40 CFR 60.443(b) as calculated over a calendar month [40 CFR 60.442(a)(2)(ii)].

d. The affected coating lines are subject to 40 CFR Part 63 Subpart JJJJ--National Emission Standards For Hazardous Air Pollutants: Paper And Other Web Coating. The affected source (as the collection of web coating lines operated at the site) should comply with either of the following emission standards established by 40 CFR 63.3320(b)(1),(2),(3), or (4):

   i. No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources, and no more than 2 percent of the organic HAP applied for each month (98 percent reduction) at new affected sources; or

   ii. No more than 4 percent of the mass of coating materials applied for each month at existing affected sources, and no more than 1.6 percent of the mass of coating materials applied for each month at new affected sources; or

   iii. No more than 20 percent of the mass of coating solids applied for each month at existing affected sources,

and no more than 8 percent of the coating solids applied for each month at new affected sources; or

iv. If using an oxidizer, the unit must contain an outlet concentration of no more than 20 ppm HAP by dry volume plus a capture efficiency of 100%.

e. Each affected coating line is subject to 35 IAC 215 Subpart F, which provides that:

i. The Permittee shall not cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to Part 215, delivered to the coating applicator [35 IAC 215.204(c)]:

	Kg/l	lb/gal
All Paper Coating Except Specialty High Gloss Catalyzed Coating	0.35	2.9
Specialty High Gloss Catalyzed Coating	0.42	3.5

ii. The Permittee may comply with 35 IAC 215.205, rather than with 35 IAC 215.204. The methods or procedures used to determine emissions of organic material under 35 IAC 215.205 shall be approved by the Illinois EPA. Emissions of volatile organic material from sources subject to 35 IAC 215.204, are allowable, notwithstanding the limitations in 35 IAC 215.204, if:

A. The emissions are controlled by an afterburner system which provides:

1. 81% reduction in the overall emissions of volatile organic material from the coating line [35 IAC 215.205(b)(1)], and

2. Oxidation to carbon dioxide and water of 90% of the nonmethane volatile organic material (measured at total combustible carbon) which enters the afterburner [35 IAC 215.205(b)(2)].

B. The system used to control such emissions is demonstrated to have control efficiency equivalent to or greater than that provided under the applicable provision of 35 IAC 215.204 or 35 IAC 215.205(b) [35 IAC 215.205(c)].

7.1.4 Non-Applicability of Regulations of Concern

a. No owner or operator of a coating line subject to the limitations of 35 IAC 215.204 is required to meet the limitations of 35 IAC 215.301 or 215.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 215.204 [35 IAC 215.209].

b. The affected coating lines, solely for the purposes of HAP emissions, are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating lines are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.1.5 Control Requirements and Work Practices

a. The control system controlling the affected coating lines shall achieve at least 95.1 percent overall control efficiency. [Note: this limit is more stringent than the control options required by Condition 7.1.3(c)(ii)(A)].

b. For operation of the affected coating lines not ducted to the SRS, the thermal oxidizer combustion chamber shall be preheated to the manufacturer's recommended temperature but no less than the temperature at which compliance with Condition 7.1.5(a) was demonstrated in the most recent stack test, before the affected coating line process is begun; after coating is begun, the temperature used to demonstrate compliance shall be used.

c. The above requirements have been established in accordance with Permit 93040039 and 39.5(7) of the Act.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected coating lines are subject to the following production and emission limits:

Total combine usage of solvent and emissions on coating lines 44, 51, and 52 combined shall not exceed the following limits:

Solvent Usage[a]		VOM Emissions[b]	
(Ton/Mo)	(Ton/Yr)	(Ton/Mo)	(Ton/Yr)
450	5,000	22.1	245

[a] Fresh and recovered solvent

[b] After control with the solvent recovery system or afterburner

These limits are based on the minimum overall control efficiency of the SRS and the thermal oxidizer (95.1%) and the maximum VOM usage.

The above limitations were established in Permit 93040039, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

7.1.7 Testing Requirements

a. Testing requirements established by 40 CFR 63.3360(c),(d) and (g):

i. Organic HAP content. If the Permittee determines compliance with the emission standards in 40 CFR 63.3320 by means other than determining the overall organic HAP control efficiency of a control device, the Permittee must determine the organic HAP mass fraction of each coating material "as- purchased" by following one of the following procedures in 40 CFR 63.3360 (c)(1) through (3) described below, and determine the organic HAP mass fraction of each coating material "as-applied" by following the procedures in 40 CFR 63.3360 (c)(4) as described below. If the organic HAP content values are not determined using the procedures in 40 CFR 63.3360 (c)(1) through (3), the owner or operator must submit an alternative test method for determining their values for approval by the Administrator in accordance with 40 CFR 63.7(f). The recovery efficiency of the test method must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.

A. Method 311. The Permittee may test the coating material in accordance with Method 311 of Appendix A of 40 CFR 63. The Method 311 determination may be performed by the manufacturer of the coating material and the results provided to the owner or operator. The organic HAP content must be calculated according to the following criteria and procedures established by 40 CFR 63.3360 (c)(1)(i) through (iii):

1. Include each organic HAP determined to be present at greater than or equal to 0.1 mass percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 mass percent for other organic HAP compounds.

2. Express the mass fraction of each organic HAP the Permittee includes according to 40 CFR 63.3360 (c)(1)(i) as a value truncated to four places after the decimal point (for example, 0.3791).

3. Calculate the total mass fraction of organic HAP in the tested material by summing the counted individual organic HAP mass fractions and truncating the result to three places after the decimal point (for example, 0.763).

B. Method 24. For coatings, determine the volatile organic content as mass fraction of nonaqueous volatile matter and use it as a substitute for organic HAP using Method 24 of 40 CFR Part 60, Appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the Permittee.

C. Formulation data. The Permittee may use formulation data to determine the organic HAP mass fraction of a coating material. Formulation data may be provided to the owner or operator by the manufacturer of the material. In the event of an inconsistency between Method 311 test data and a facility's formulation data, and the Method 311 test value is higher, the Method 311 data will govern. Formulation data may be used provided that the information represents all organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used.

D. As-applied organic HAP mass fraction. If the as-purchased coating material is applied to the web without any solvent or other material added, then the as-applied organic HAP mass fraction is equal to the as-purchased organic HAP mass fraction. Otherwise, the as-applied

organic HAP mass fraction must be calculated using Equation 1a of 40 CFR 63.3370.

ii. Volatile organic and coating solids content. If the Permittee determines compliance with the emission standards in 40 CFR 63.3320 by means other than determining the overall organic HAP control efficiency of a control device and the Permittee chooses to use the volatile organic content as a surrogate for the organic HAP content of coatings, the Permittee must determine the as-purchased volatile organic content and coating solids content of each coating material applied by following the procedures in 40 CFR 63.3360(d)(1) or (2), and the as-applied volatile organic content and coating solids content of each coating material by following the procedures in 40 CFR 63.3360(d)(3):

A. Method 24. The Permittee may determine the volatile organic and coating solids mass fraction of each coating applied using Method 24 (40 CFR Part 60, Appendix A). The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee. If these values cannot be determined using Method 24, the Permittee must submit an alternative technique for determining their values for approval by the Administrator.

B. Formulation data. The Permittee may determine the volatile organic content and coating solids content of a coating material based on formulation data and may rely on volatile organic content data provided by the manufacturer of the material. In the event of any inconsistency between the formulation data and the results of Method 24 of 40 CFR Part 60, Appendix A, and the Method 24 results are higher, the results of Method 24 will govern.

C. As-applied volatile organic content and coating solids content. If the as-purchased coating material is applied to the web without any solvent or other material added, then the as-applied volatile organic content is equal to the as-purchased volatile content and the as-applied coating solids content is equal to the as-purchased coating solids content. Otherwise, the as-applied volatile organic content must be calculated using Equation 1b of 40 CFR 63.3370 and the as-applied coating solids content must

be calculated using Equation 2 of 40 CFR 63.3370.

iii. Control device efficiency. If the Permittee uses an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in 40 CFR 63.3320, the Permittee must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in 40 CFR 63.3360(e)(1) and (e)(2). During the performance test, the Permittee must establish the operating limits required by 40 CFR 63.3321 according to 40 CFR 63.3360(e)(1).

iv. Capture efficiency. If the Permittee demonstrates compliance by meeting the requirements of 40 CFR 63.3370(e),(f),(g),(h),(i)(2),(k),(n)(2),n(3) or (p), the Permittee must determine capture efficiency using the procedures specified in 40 CFR 63.3360, as applicable.

v. Volatile matter retained in the coated web or otherwise not emitted to the atmosphere. The Permittee may choose to take into account the mass of volatile matter retained in the coated web after curing or drying or otherwise not emitted to the atmosphere when determining compliance with the emission standards in 40 CFR 63.3320. If the Permittee chooses this option, the Permittee must develop a testing protocol to determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere and submit this protocol to the Administrator for approval. The Permittee must submit this protocol with the site-specific test plan under 40 CFR 63.7(f). If the Permittee intend to take into account the mass of volatile matter retained in the coated web after curing or drying or otherwise not emitted to the atmosphere and demonstrate compliance according to 40 CFR 63.3370(c)(3),(c)(4),(c)(5),or (d), then the test protocol must determine the mass of organic HAP retained in the coated web or otherwise not emitted to the atmosphere. Otherwise, compliance must be shown using the volatile organic matter content as a surrogate for the HAP content of the coatings.

b. Testing requirements established for purposes of compliance demonstration with 40 CFR Part 60 Subpart RR:

i. 40 CFR 60.444:

A. The performance test for affected facilities controlled by a solvent recovery device shall be conducted as follows:

1. The performance test shall be a one calendar month test and not the average of three runs as specified in 40 CFR 60.8(f).

2. The weighted average mass of VOC per mass of coating solids applied for a one calendar month period shall be determined as specified in 40 CFR 60.443(a)(1) and (2).

3. Calculate the required percent overall VOC emission reduction as specified in 40 CFR 60.443(b).

4. Inventory VOC usage and VOC recovery for a one calendar month period.

5. Determine the percent overall VOC emission reduction as specified in 40 CFR 60.443(c).

B. The performance test for affected facilities controlled by a solvent destruction device shall be conducted as follows:

1. The performance of the solvent destruction device shall be determined by averaging the results of three test runs as specified in 40 CFR 60.8(f).

2. Determine for each affected facility prior to each test run the weighted average mass of VOC per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in 40 CFR 60.443(a). In this application the quantities of W_oi, W_si, and M_ci shall be determined for the time period of each test run and not a calendar month as specified in 40 CFR 60.441.

3. Calculate the required percent overall VOC emission reduction as specified in 40 CFR 60.443(b).

c. Determine the percent overall VOC emission reduction of the solvent destruction device by the following equation and procedures:

$$R = \frac{\sum_{i=1}^{n} Q_b i C_b i - \sum_{i=1}^{m} Q_a j C_a i}{\sum_{i=1}^{n} Q_b i C_b i + \sum_{k=1}^{p} Q_f k C_f k} \times 100$$

1. The owner or operator of the affected facility shall construct the overall VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in 40 CFR 60.446(b).

2. The owner or operator of an affected facility shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive VOC emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is totally capturing fugitive VOC emissions, then no additional total enclosure will be required for the performance test.

3. For each affected facility where the value of R is greater than or equal to the value of R_q calculated in 40 CFR 60.443(b), compliance with 40 CFR 60.442(a)(2) is demonstrated.

ii. For the affected coating lines, the Permittee shall comply with the applicable Test methods and procedures specified in 40 CFR 60.446.

iii. The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 215.105 except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the

Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A incorporated by reference in Section 215.105. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].

iv. To determine compliance with 40 CFR 60.442 the owner or operator of the affected facility shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

A. Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

B. Compute the weighted average by the following equation

$$G = \frac{\sum_{i=1}^{n} W_{oi} \; M_{ci}}{\sum_{i=1}^{n} W_{si} \; M_{ci}}$$

Where:

G = The calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month

M_{ci} = The total mass (kg) of each coating (i) applied during the calendar month as determined from facility records

W_{oi} = The weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data

W_{si} = The weight fraction of solids applied of each coating (i) applied during a

calendar month as determined from Method 24 or coating manufacturer's formulation data

C. For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with 40 CFR 60.442(a)(1).

v. To determine compliance with 40 CFR 60.442(a)(2), the owner or operator shall calculate the required overall VOC emission reduction according to the following equation:

$$R_q = \frac{G - 0.20}{G} \times 100$$

Where:

R_q = The required overall VOC emission reduction (in percent)

If R_q is less than or equal to 90 percent, then the required overall VOC emission reduction is R_q. If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

c. Overall VOM reduction efficiency of the thermal oxidizer shall be tested once in five years prior the expiration date of this permit and be submitted to the Illinois EPA. Testing shall be done in accordance with Conditions 7.1.7(b)(i)(C),(D), 8.5 and 8.6 of this permit.

7.1.8 Monitoring Requirements

a. For the affected coating lines, the Permittee shall comply with the applicable Monitoring of operations specified in 40 CFR 60.445 (all applicable recordkeeping requirements from 40 CFR 60.445 are described further in Condition 7.1.9):

i. The owner or operator of an affected facility controlled by a solvent recovery device shall install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of solvent recovered by the device over a calendar month period. The monitoring device shall be accurate within ±2.0 percent [40 CFR 60.445(c)].

ii. The owner or operator of an affected facility controlled by a thermal incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of

the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of ±0.75 percent of the temperature being measured expressed in degrees Celsius or ±2.5°C [40 CFR 60.445(e)].

iii. The owner or operator of an affected facility controlled by a solvent destruction device which uses a hood or enclosure to capture fugitive VOC emissions shall install, calibrate, maintain, and operate a monitoring device which continuously indicates that the hood or enclosure is operating. No continuous monitor shall be required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system [40 CFR 60.445(e)].

b. Compliance Assurance Monitoring (CAM) Requirements

All affected coating lines, solely for the purposes of VOM emissions, are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3, Table 1 pursuant to 40 CFR Part 64 as submitted in the Permittee’s CAM plan application. At all times, the owner or operator shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment [40 CFR 64.7(a) and (b)].

i. Continued Operation [40 CFR 64.7(c)]

Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The Permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor

maintenance or careless operation are not malfunctions.

ii. Response to Excursions or Exceedances [40 CFR 64.7(d)]

A. Upon detecting an excursion or exceedance, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected coating lines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Records required by 40 CFR 63.3410:

i. Each owner or operator of an affected source subject to Subpart JJJJ must maintain the records specified below on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1):

Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, such as:

A. Control device and capture system operating parameters data in accordance with the requirements of 40 CFR 63.3350(c), (e), and (f);

B. Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(c);

C. Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(d);

D. Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of 40 CFR 63.3370(b), (c), and (d); and

E. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of 40 CFR 63.3360(e) and (f).

ii. Each owner or operator of an affected source subject to Subpart JJJJ must maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.3370. The records must be maintained in accordance with the requirements of 40 CFR 63.10(b).

b. Records required by 40 CFR 60.445:

i. The owner or operator of an affected facility subject to Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in 40 CFR 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.

ii. The owner or operator of an affected facility controlled by a solvent recovery device shall maintain a calendar month record of the amount of solvent applied in the coating at each affected facility (line).

iii. The owner or operator shall maintain a calendar month record of the amount of solvent recovered by the solvent recovery device.

c. For purposes of CAM, the Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

d. The Permittee shall maintain the following records upon issuance of this permit:

i. Monthly and annual solvent usage (gallons or pounds).

ii. Type and density of solvent used.

iii. Amount of solvent reclaimed for reuse or sent offsite for disposal, including percent concentration of solvent in waste.

iv. Monthly and annual VOM/HAP emissions determined based on the Compliance Procedures of Condition 7.1.12.

7.1.10 Reporting Requirements

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

a. The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of the affected coating lines with the permit requirements within 30 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.

b. Reporting requirements established in 40 CFR 63.3400:

The Permittee must submit a semiannual compliance report according to the following as established in 40 CFR 63.3400(c)(1) and (2):

i. Compliance report dates.

A. Each compliance report must cover the semiannual reporting period from January 1 through June 30 and the semiannual reporting period from July 1 through December 31. Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

B. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in 40 CFR 63.3400 (c)(1)(i) through (iv).

ii. The compliance report must contain the following information described in 40 CFR 63.3400 (c)(2)(i) through (vi):

A. Company name and address.

B. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.

C. Date of report and beginning and ending dates of the reporting period.

D. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to the source, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

E. For each deviation from an emission limitation (emission limit or operating limit) that applies to the source and that occurs at an affected source where CEMS not being used to comply with the emission limitations in Subpart JJJJ, the compliance report must contain the information in 40 CFR 63.3400(c)(2)(i) through (iii), and:

1. The total operating time of each affected source during the reporting period.

2. Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

3. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

4. A summary of the total duration (in hours) of each deviation during the reporting period and the total duration of each deviation as a percent of the total source operating time during that reporting period.

5. A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

c. Reporting requirements established in 40 CFR 60.447:

i. Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Illinois EPA or USEPA of exceedances of the VOC emission limits specified in 40 CFR 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted semiannually.

ii. The owner or operator of each affected facility shall also submit reports when the thermal incinerator temperature drops as defined under 40 CFR 60.443(e). If no such periods occur, the owner or operator shall state this in the report.

d. Semiannual compliance reports identified in Condition 7.1.10(b)(i) would be submitted together with the source-wide monitoring reports required by Condition 8.6.1.

7.1.11 <u>Operational Flexibility/Anticipated Operating Scenarios</u>

Operational flexibility is not set for the affected coating lines.

7.1.12 Compliance Procedures

a. Compliance with requirements of Condition 7.1.5 shall be based on the appropriate testing, monitoring, recordkeeping and reporting requirements as established in Conditions, 7.1.7, 7.1.8, 7.1.9 and 7.1.10 respectively.

b. Compliance of the affected coating lines with VOM emission limitations of Condition 7.1.3(e)(i) shall be based on the recordkeeping requirements of Condition 7.1.9 and by the use of the formula listed below:

VOM Coating Content = V x D/[1 - W x D],

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \Sigma (w_i/d_i),$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, lb/gal

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

c. Compliance of the affected coating lines with the control requirements of Condition 7.1.3(e)(ii) shall be based on the use of SRS and/or thermal oxidizer in accordance with the testing, monitoring, recordkeeping and reporting requirements as established in Conditions, 7.1.7, 7.1.8, 7.1.9 and 7.1.10 respectively.

d. Total VOM and HAP emissions from the affected coating lines (from both coating and cleanup operations) shall be calculated based on the following equations:

VOM Emissions = (VOM usage, tons) x (1 – overall control efficiency of control devices, %)

HAP Emissions = (HAP usage, tons) x (1 – overall control efficiency of control devices, %)

e. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.2 Boilers

7.2.1 Description

The plant has two 25.2 mmBtu/hr steam boilers, which supply all of the steam used in the process and provide heat in the winter

Note: This narrative description is for informational purposes only and is not enforceable.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
SB-1 and SB-2	Two 25.2 mmBtu/hr Natural Gas-Fired Boilers	1994	None

7.2.3 Applicable Provisions and Regulations

a. An "affected boiler" for the purpose of these unit-specific conditions, is each boiler as described in conditions 7.2.1 and 7.2.2.

b. Each affected boiler is subject to the emission limits identified in Condition 5.3.2.

c. The affected boilers are subject to the NSPS for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc. The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.

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

7.2.4 Non-Applicability of Regulations of Concern

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

b. The provisions of 35 IAC 215.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 215.303].

c. This permit is issued based on the affected boilers not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers do not use an add-on control device.

7.2.5 Control Requirements and Work Practices

Natural gas shall be the only fuel fired in the affected boilers. This is established in accordance with provisions 39.5(7)(b) and (d) of the Act.

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected boilers.

7.2.7 Testing Requirements

Testing requirements are not set for the affected boilers.

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected boilers.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee of each affected boiler shall record and maintain records of the natural gas consumed either during each day or each month, as specified in 40 CFR 60.48c(g)(1) and (g)(2).

b. Monthly and annual emissions from the affected boilers shall be maintained, based on fuel consumption and the applicable emission factors described in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected boilers from the

permit requirements, 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:

The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of the affected boilers with the permit requirements within 30 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.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boilers.

7.2.12 Compliance Procedures

a. Compliance with Condition 7.2.3 is achieved by the consumption of the natural gas as the only fuel used in the affected boilers.

b. To determine compliance with the emission limits in Condition 5.5.1, emissions from the affected boilers shall be calculated based on the following emission factors:

Pollutant	Emission Factor ($lb/10^6 ft^3$)
PM	7.6
NO_x	100.0
CO	84
VOM	5.5

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

Boiler Emissions (ton) = [(Natural Gas Consumed, mmscf) x (The Appropriate Emission Factor, lb/mmscf)]/(2,000 lb/ton)

c. The condition described above is established in accordance with provisions 39.5(7) of the Act.

7.3 Air Stripper

7.3.1 Description

The air stripper is used to remove VOM from the wastewater discharged from the SRS.

Note: This narrative description is for informational purposes only and is not enforceable.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Air Stripper	Decant Water Air Stripper	1996	SRS

7.3.3 Applicable Provisions and Regulations

a. The "affected air stripper" for the purpose of these unit-specific conditions, is an air stripper as described in Conditions 7.3.1 and 7.3.2.

b. The affected air stripper is subject to 35 IAC Part 215 Subpart K, Use of Organic Material, which provides that:

i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.3.3(b)(ii) (see also 35 IAC 215.302) and the following exception: If no odor nuisance exists the limitation of this Condition shall apply only to photochemically reactive material [35 IAC 215.301].

ii. Emissions of organic material in excess of those permitted by Condition 7.3.3(b)(i) (see also 35 IAC 215.301) are allowable if such emissions are controlled by a vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere [35 IAC 215.302(b)].

7.3.4 Non-Applicability of Regulations of Concern

Non-applicability of regulations of concern are not set for the affected air stripper.

7.3.5 Control Requirements and Work Practices

The control requirements and work practices are not set for the affected air stripper.

7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6.1, the affected air stripper is subject to the following:

Emissions from the affected air stripper shall not exceed the following limits:

VOM Emissions	
(Lb/Hour)	(Ton/Year)
0.4	1.75

The above limitations were established in Permit 96120061, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

7.3.7 Testing Requirements

The testing requirements are not set for the affected air stripper.

7.3.8 Monitoring Requirements

See Condition 7.1.8(a) and (b) for the monitoring requirements of the SRS control.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected air stripper to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Maximum pumping rate (gallons/minute);

b. Hours of operation (hours/year);

c. Maximum VOM and HAP concentration (mg/l); and

d. VOM and HAP amounts (tons/month and tons/year) ducted to SRS and VOM/HAP emissions calculated in accordance with the compliance procedure described in Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected air stripper from the permit requirements, 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:

The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of the affected air stripper with the permit requirements within 30 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

Operational flexibility is not set for the affected air stripper.

7.3.12 Compliance Procedures

a. Compliance with the emission limits in Conditions 5.6.1 and 7.3.6 shall be calculated based on the following emission equation:

Air Stripper Emissions (ton) ducted to and controlled by the SRS = [(Pumping rate, gal/minute) x (Pollutant concentrations, mg/l) x (1 lb/454 mg) x (3.785 l/gal) x (60 minutes/hr)] x [(1 – control efficiency (%)]/100

b. The condition described above is established in accordance with provisions 39.5(7) of the Act.

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 (TO BE DETERMINED), unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

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

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

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

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

i. Describe the physical or operational change;

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

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

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

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

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of 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 Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of

such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	July 31
July - December	January 31

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 determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;

e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.

b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

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

c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

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.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

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, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

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

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

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

practices, or operations regulated or required under this permit;

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

i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; 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. At 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 including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a 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, Air Quality Planning 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 Unit, 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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

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 [Section 39.5(7)(k)(iv) of the Act].

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, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

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 that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

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

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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the 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

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

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

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

b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A\ (P)^{B}$$

Where:

P = Process weight rate

E = Allowable emission rate

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

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

ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

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

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

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

Attachment 3 - Compliance Assurance Monitoring (CAM) Plan

Table 1 - PSEU Designation:	Coating Line #44 (controlled by SRS)	
Pollutant:	VOM	
Indicators:	#1: Flame Ionization Detectors VOM Concentration Monitors	#2: N/A

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Use FID concentration monitors to measure VOM concentrations in the SRS inlet & exhaust ducts	
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	>95.1% SRS efficiency on a monthly average	
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	<95.1% SRS efficiency on a monthly average	

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	FID concentration monitors to measure VOM concentration are installed in the SRS inlet & exhaust ducts	
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	FID concentration monitors are monitored and will alarm if a malfunction occurs	
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	FID concentration monitors are zeroed daily and spanned weekly per manufacturer's calibration procedures	
THE MONITORING FREQUENCY:	Daily	
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Data is electronically collected & maintained for period of 5 years	
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Monthly	

Table 2 - PSEU Designation:	Coating Lines #51 and #52 (controlled by SRS and RTO)	
Pollutant:	VOM	
Indicators:	#1: Flame Ionization Detectors VOM Concentration Monitors	#2: Combustion chamber temperature

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Use FID concentration monitors to measure VOM concentrations in the SRS inlet & exhaust ducts	Rolling 3 hours average temperature
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	>95.1% SRS efficiency on a monthly average	>1475^0 F
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	<95.1% SRS efficiency on a monthly average	<1475^0 F

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	FID concentration monitors to measure VOM concentration are installed in the SRS inlet & exhaust ducts	Combustion chamber temperature thermocouples
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	FID concentration monitors are monitored and will alarm if a malfunction occurs	Combustion chamber temperature thermocouples are used continuously
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	FID concentration monitors are zeroed daily and spanned weekly per manufacturer's calibration procedures	Combustion chamber temperature thermocouples are either calibrated within +/-1% of the average temp or replaced on 3 months intervals
THE MONITORING FREQUENCY:	Daily	Daily

THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Data is electronically collected & maintained for period of 5 years	Data is electronically collected & maintained for period of 5 years. This data is used to calculate the 3 hr average of combustion chamber temperature
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Monthly	3 hrs.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf
www.epa.state.il.us/air/permits/197-fee.pdf

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