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1.0 SOURCE IDENTIFICATION

1.1 Source

United Airlines - O'Hare International Airport
O'Hare International Airport
Chicago, Illinois 60666
773/601-3700

I.D. No.: 031600FXH

Standard Industrial Classification: 4512, Airfield and associated
activities for aircraft
maintenance

1.2 Owner/Parent Company

United Airlines - WHQSY
1200 East Algonquin Road
Elk Grove, Illinois 60007

Contact Person's Name:
Phil Fowlie
847/700-6995

1.3 Operator

United Airlines - O'Hare International Airport
O'Hare International Airport
Post Office Box 66140
Chicago, Illinois 60666

Contact Person's Name:
Dave Deborde
773/601-3700

1.4 General Source Description of Source

United Airlines is located at O'Hare International Airport in Chicago and provides aircraft and ground support equipment (GSE) maintenance activities. Since the City of Chicago or any other state or federal institutions does not control the operations of United Airlines, it has been deemed that the stationary sources of air pollution operated by City of Chicago (Department of Aviation) or other airlines are not part of the same Part 70 site as the stationary sources of air pollution operated by United Airlines.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
EC	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
cc	cubic centimeters
CFR	Code of Federal Regulations
cfm	cubic feet per minute
cm	centimeters
CO	Carbon Monoxide
EF	degrees Fahrenheit
ft	feet
ft ³	cubic foot
g	grams
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hp	Horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
in	inches
kg	kilogram
kPa	kilopascal
l	liter
lb	pound
LEL	Lower Explosive Limit
m	meter
m ³	cubic meter
MBtu	Million Btu
mg	milligrams
mmHg	millimeters of mercury
mmscf	million standard cubic feet
mo	month
MW	Megawatts
NSPS	New Source Performance Standards
NO _x	Nitrogen Oxides
PIMW	Potentially Infectious Medical Wastes
PM	Particulate Matter
ppm	Parts Per Million

PSD	Prevention of Significant Deterioration
psi	pounds per square inch
PTE	Permanent Total Enclosure
psia	pounds per square inch absolute
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
T	ton
T1	Title I B identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New B identifies Title I conditions that are being established in this permit
T1R	Title I Revised B identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
Wt	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Aircraft Wheel Washing Stations

- 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:

Aircraft Deicing Operations

- 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:

- a. 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 MBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 MBtu/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)].
- b. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons provided the tank is not used for the storage of gasoline or any listed hazardous air pollutant pursuant to Section 112(b) of the Clean Air Act [35 IAC 201.210.(a)(10)].

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

3.2 Compliance with Applicable Requirements

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

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

3.3 Addition of Insignificant Activities

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 1	Ground Support Equipment Coating Booths	1. Large Coating and touch-up booth for auto refinishing	Filters
		2. Small Coating and touch-up booth for engine refinishing	Filter
Unit 2	Aircraft Components Coating Booth	Aircraft Components Coating	Water Curtain
Unit 3	Maintenance and Touch-up Coating Activities	Aircraft and ground support equipment maintenance and touch-up coating activities	None
Unit 4	Gasoline Storage Tanks	Nine gasoline storage tanks. Capacity range: from 2,500 gal to 15,000 gal.	All tanks equipped with a submerged loading pipe and pressure/vacuum relief valve
Unit 5	Natural Gas Combustion Units	Eight boilers and ten heaters	None
Unit 6	Internal Combustion Engine	One emergency diesel fuel-fired internal combustion engine with a power output of 1750 KW (6.0 MBtu/hr).	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

- a. No person shall cause or allow the emissions 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. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minutes period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any such emission unit owned or operated by the Permittee and provided further that such more opaque emissions permitted from each such emission unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).

5.2.3 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 Non-Applicability of Regulations of Concern

United Airlines operations at O'Hare are not subject to limitations and requirements of 40 CFR Part 63, Subpart GG National emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities@ for the following reasons:

- i. This plant is not a major source of HAPs as defined in 63.2; and
- ii. This plant is engaged into depainting of radomes of aircrafts and exempted from the requirements of 40 CFR Part 63, Subpart GG, pursuant to 63.746(a)(3)(i).

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile Organic Material (VOM)	51.41
Sulfur Dioxide (SO ₂)	0.77
Particulate Matter (PM)	11.57
Nitrogen Oxides (NO _x)	102.22
HAP, not included in VOM or PM	0.48
TOTAL	166.45

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by regulation so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, or Section 502(b) (10) of the CAA.

5.6 General Recordkeeping Requirements

5.6.1 Emission records

- a. The Permittee shall keep and maintain records of total emissions on a calendar year basis for the equipment covered by unit-specific conditions (Section 7) to demonstrate compliance with Condition 5.5.1.
- b. The Permittee shall keep records of the annual glycol usage (gal/year) for aircraft deicing operations performed by United Airlines.

5.6.2 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.

5.7 General Reporting Requirements

5.7.1 Annual Emissions Report

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

5.7.2 The Permittee shall promptly notify the Illinois EPA if the emissions exceed the limits in Condition 5.5.1 and appropriate unit-specific conditions of Section 7.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements, and Compliance Procedures in Section 7 (Unit-Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold allotment trading units (ATUs) for their actual seasonal VOM emissions. Each year, starting with the 1999 ozone season, participating sources are issued ATUs based on allotments set during initial issuance of the source's CAAPP permit. These allotments are established from historical VOM emissions or baseline emissions lowered to provide the emission reduction from stationary sources required for further progress.

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

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

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

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System

(ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions in tons during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit;
 - iii. Total VOM emissions from the source in tons during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 1: Ground Support Equipment Coating Booths

7.1.1 Description

Coating booths are used for body and engine refinishing of the ground support vehicles.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 1	Ground Support Equipment Coating Booths	1. Large Coating and touch-up booth for auto refinishing Constructed in 1977	Filter
		2. Small Coating and tough-up booth for engine refinishing Constructed in 1995	Filter

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating booth" for the purpose of these unit specific conditions is a coating booth which is used for ground support vehicle refinishing operations.
- b. Each affected coating booth at the source is subject to the limitation and requirements of 35 IAC Part 218, Subpart HH: Motor Vehicle Refinishing. This limitation and requirements are described further in Conditions 7.1.5 and 7.1.6.
- c. Each affected coating booth is subject to 35 IAC 212.321(b)(1), which provides that:

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

7.1.4 Non-Applicability of Regulations of Concern

None

7.1.5 Operational and Production Limits and Work Practices

- a. Every owner or operator of a motor vehicle refinishing operation, unless the source uses less than 20 gallons of coating per calendar year from all motor vehicle refinishing operations combined, shall [35 IAC 218.784]:
 - i. Coat motor vehicles, mobile equipment, or their parts and components using one of the following coating applicators:
 - A. Electrostatic spray equipment calibrated, operated and maintained in accordance with the manufacturer's specifications; or
 - B. High Volume Low Pressure (HVLP) spray equipment calibrated, operated and maintained in accordance with the manufacturer's specifications.
 - ii. Clean all coating applicators with a device that:
 - A. Recirculates solvent during the cleaning process;
 - B. Collects spent solvent so it is available for disposal or recycling; and
 - C. Minimizes evaporation of solvents during cleaning, rinsing, draining, and storage.
- b. Every owner or operator of a motor vehicle refinishing operation shall ensure that fresh and spent solvent, cloth or paper used to apply solvents for surface preparation or cleanup, waste paint, and sludge are stored in closed containers [35 IAC 218.787(a)].
- c. Every owner or operator of a motor vehicle refinishing operation that is exempt from the equipment specifications in 35 IAC 218.784 because it uses less than 20 gallons of coating per year shall direct solvent used to clean coating applicator equipment and paint lines into a container for proper disposal or recycling [35 IAC 218.787(b)].

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

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, each affected coating booth is subject to the following:

- a. No owner or operator of a motor vehicle refinishing operation shall coat motor vehicles, mobile equipment, or their parts and components, unless all coatings, except touch-up coatings, never exceed the follow VOM content limitations, expressed as units of VOM per volume of coating applied at each coating applicator, minus water and any compounds that are specifically exempted from the definition of VOM [35 IAC 218.780(a)]:

	<u>kg/l</u>	<u>lb/gal</u>
Pretreatment Wash Primer	0.78	6.5
Precoat	0.66	5.5
Primer/Primer Surfacer Coating	0.58	4.8
Primer Sealer	0.55	4.6
Topcoat System or Basecoat/Clearcoat	0.60	5.0
Three or Four Stage Topcoat System	0.63	5.2
Specialty Coatings	0.84	7.0
Anti-Glare/Safety Coating	0.84	7.0

- b. All coating shall be used according to manufacturer's specifications. If a coating requires the addition of a reducer, hardener, or other additive, in some combination, this addition must not cause the coating, as applied, to exceed the applicable VOM content limitation [35 IAC 218.780(b)].
- c. Specialty coatings shall represent no more than 5 percent, by volume, of all coatings applied at a source on a monthly basis [35 IAC 218.780(c)].
- d. The following equations shall be used to calculate the VOM content of topcoat systems:
 - i. The VOM content of basecoat/clearcoat systems shall be calculated in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), according to the following equation [35 IAC 218.780(d)]:

$$\text{VOM Tbc/cc} = (\text{VOMbc} + 2 \text{VOMcc})/3$$

Where:

VOM Tbc/cc = The weighted average of the VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), in the basecoat (bc) and clearcoat (cc) system;

VOMbc = The VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), of any given basecoat; and

VOMcc = The VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), of any given clearcoat.

- ii. The VOM content for a three stage coating system shall be calculated in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), according to the following formula:

$$\text{VOM Tms} = (\text{VOMbc} + \text{VOMmc} + 2 \text{VOMcc}) / 4$$

Where:

VOM Tms = The weighted average of the VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), in the basecoat, midcoat and clearcoat system;

VOMbc = The VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted

from the definition of VOM),
of any given basecoat;

VOMmc = The VOM content, as applied,
in units of kg VOM/l (lbs
VOM/gal) of coating, (minus
water and any compounds which
are specifically exempted
from the definition of VOM),
of any given midcoat; and

VOMcc = The VOM content, as applied,
in units of kg VOM/l (lbs
VOM/gal) of coating, (minus
water and any compounds which
are specifically exempted
from the definition of VOM),
of any given clearcoat.

- iii. The VOM content for a four stage coating system shall be calculated in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), according to the following formula:

$$\text{VOM Tms} = (\text{VOMbc} + \text{VOMmc1} + \text{VOMmc2} + 2 \text{VOMcc})/5$$

Where:

VOM Tms = The weighted average of the VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), in the basecoat, midcoats and clearcoat system;

VOMbc = The VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), of any given basecoat;

VOMmc1 = The VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), of the first midcoat;

VOMmc2 = The VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), of the second midcoat; and

VOMcc = The VOM content, as applied, in units of kg VOM/l (lbs VOM/gal) of coating, (minus water and any compounds which are specifically exempted from the definition of VOM), of any given clearcoat.

- e. Every owner or operator of a motor vehicle refinishing operation only shall use surface preparation materials that never exceed the following VOM content limitations for the specified substrate [35 IAC 218.786]:

	<u>kg/l</u>	<u>lb/gal</u>
Plastic Parts	0.78	6.5
Other Substrates	0.17	1.4

- f. Emissions and operation of an affected small coating booth for engine refinishing shall not exceed the following limits:

<u>Coating Usage</u>		<u>VOM Emissions</u>	
<u>(gal/mo)</u>	<u>(gal/yr)</u>	<u>(T/mo)</u>	<u>(T/yr)</u>
10	50	0.02	0.1

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the coating booth below the levels that would trigger the applicability of these rules consistent with the information provided in the CAAPP application [T1N]. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.1.7 Testing Requirements

- a. Upon request by the Illinois EPA, the owner or operator of a motor vehicle refinishing operation

shall, at its own expense, conduct tests to demonstrate compliance with 35 IAC 218.780 or 218.786, in accordance with the applicable test methods and procedures specified in 35 IAC 218.105 and shall [35 IAC 218.788(a)]:

- i. Notify the Illinois EPA 30 days prior to conducting such tests; and
 - ii. Submit all test results to the Illinois EPA within 45 days after conducting the requisite tests.
- b. For purposes of 35 IAC 218.788, surface preparation materials shall be treated as coatings [35 IAC 218.788(b)].
- c. Nothing shall limit the authority of USEPA pursuant to the Clean Air Act, as amended, to require testing, or shall affect the authority of USEPA under Section 114 of the Clean Air Act [35 IAC 218.788].

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected coating booths to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act and 35 IAC 218.790:

- a. After March 15, 1996 every owner or operator of a motor vehicle refinishing operation shall maintain the following records and such records shall be made available to the Illinois EPA immediately upon request [35 IAC 218.790]:
 - i. The name and manufacturer of each coating and surface preparation product used at the source each month;
 - ii. The volume of each category of coating, as set forth in 35 IAC 218.780, purchased by the source each month;
 - iii. The coating mixing instructions, as stated on the container, in literature supplied with the coating, or otherwise specified by the manufacturer, for each coating purchased by the source each month;

- iv. The VOM content, expressed as weight of VOM per volume of coating, minus water and any compounds that are specifically exempted from the definition of VOM, recorded on a monthly basis for:
 - A. Each coating as purchased, if the coating is not mixed with any additives prior to application on the substrate; or
 - B. Each coating after mixing according to manufacturer's instructions as collected pursuant to subsection (c) of this Section.
 - v. The weighted average VOM content of the coating, as specified in Condition 7.1.6 and 35 IAC 218.780(d)(1), (d)(2) or (d)(3), for each basecoat/clearcoat, and three or four stage coating system purchased by the source, recorded on a monthly basis;
 - vi. The total monthly volume of all specialty coatings purchased and the percentage specialty coatings comprise in the aggregate of all coatings purchased by the source each month;
 - vii. The volume of each category of surface preparation material, as set forth in 35 IAC 218.786, purchased by the source each month; and
 - viii. The VOM content, expressed as weight of VOM per volume of material, including water, of each surface preparation material purchased by the source, recorded on a monthly basis [35 IAC 218.790].
- b. The coating usage (gal/mo and gal/yr).
 - c. The VOM content of each coating applied, % by wt.
 - d. Density of coatings, lb/gal.
 - e. Cleanup solvent usage (gal/mo and gal/yr) and the density of applied solvents (lb/gal).
 - f. The VOM emissions (tons/mo and tons/yr) from affected small coating booth for engine refinishing for verifying compliance with Condition 7.1.6(f) and calculated based on the compliance procedures from Condition 7.1.12.

- g. Total VOM emissions (tons/mo and tons/yr) from all affected coating booths which are calculated based on the compliance procedures from Condition 7.1.12.

7.1.10 Reporting/Registration Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

a. Reporting

Emissions of VOM from affected coating booths in excess of the limits specified in Condition 5.5.1 and Condition 7.1.6 based on the 12 months rolling period.

b. Registration

- i. Every owner or operator of a motor vehicle refinishing operation shall register with the Illinois EPA on or before March 15, 1996 and re-register no later than 45 days following the end of each subsequent calendar year. The following information shall be included in this registration [35 IAC 218.792(a)]:

- A. The name and address of the source, and the name and telephone number of the person responsible for submitting the registration information;
- B. A description of all coating operations of motor vehicles, mobile equipment, or their parts or components, and all associated surface preparation operations at the source;
- C. A description of all coating applicators used at the source to comply with 35 IAC 218.784(a), if applicable;
- D. A description of all cleanup operations at the source, including equipment used to comply with 35 IAC 218.784(b), if applicable;
- E. A description of all work practices at the source used to comply with 35 IAC 218.787;
- F. If a source claims to be exempt from the equipment requirements in 35 IAC 218.784

because it uses less than 20 gallons of coating per year, the owner's or operator's certification that the annual usage is below this level; and

G. A written declaration stating whether the source is complying with 35 IAC Part 218, Subpart HH by using coatings that comply with the applicable VOM content limits in 35 IAC 218.780 and Condition 7.1.6 of this permit.

ii. At least 30 calendar days before changing the method of compliance to or from 35 IAC 218.780 and 218.782, the owner or operator of a motor vehicle refinishing operation shall notify the Illinois EPA and certify that the source is in compliance with the applicable requirements for the new method of compliance [35 IAC 218.792(b)].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating booth prior to notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.1.7, the source wide emission limitations in Condition 5.5.1 are not exceeded and an affected coating booths remain in compliance with limitations of Condition 7.1.6.

7.1.12 Compliance Procedures

a. Compliance of an affected coating booth with the source wide VOM emission limitations in Condition 5.5.1 and emission limitation for small coating booth for engine refinishing in Condition 7.1.6(f) shall be based on the recordkeeping requirements in Condition 7.1.9 and the following equation:

i. Emissions from Coating Operation (EI) = Actual Coating Usage (gal/mo) x Coating Density (lb/gal) x VOM Content of the Coating (wt.%);

ii. Emissions from Cleanup Operation (EII) = (Actual Clean-up Solvent Usage (gal/mo) x

Solvent Density (lb/gal) x VOM Content of the Clean-up Solvent (wt.%); and

iii. Total VOM Emissions (T/mo and T/yr) = EI + EII

- b. Compliance of the applied coatings, other than described in Condition 7.1.6(d), with VOM emission limitations in Condition 7.1.6(a) and (e) shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing or by use of the formula listed below:

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

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

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

Where:

w_i = Percent exempt compound i in the coating,

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

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

- c. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of the affected coating booths.
- d. To determine compliance with Condition 5.5.1, emissions of PM/PM-10 from the affected coating booths shall be calculated based on the following:

$$\text{PM Emissions} = (\text{Air flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Filter Efficiency}^* (\%)/100)].$$

* As specified by manufacturer or vendor of the filter.

7.2 Unit 2: Aircraft Components Coating Booth

7.2.1 Description

Coating of aircraft nose cones and other aircraft components is performed.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 2	Aircraft Components Coating Booth	Nose cones and other aircraft components coating Date of Construction: 1965	Water Curtain

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected aircraft components coating booth" for the purpose of these unit specific conditions is a coating booth which is used primarily for the coating of aircraft nose cones (radomes) and other aircraft components.
- b. An affected coating booth is subject to the limitation of 35 IAC Part 218, Subpart G ~~A~~Use of organic material~~@~~ and/or 35 IAC 218.204(j)(2)(A). These limitations are described further in Conditions 7.2.6.
- c. An affected coating booth is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

7.2.4 Non-Applicability of Regulations of Concern

- a. An affected coating booth is not subject to limitations and requirements of 40 CFR Part 63, Subpart GG ~~A~~National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities~~@~~, for the following reasons:

- i. This plant is not a major source of HAPs as defined in 63.2; and
 - ii. Depainting of nose cones and parts which are normally removed from the primary aircraft structure before repainting, is exempted from applicability of 40 CFR Part 63, Subpart GG, pursuant to 63.746 (a)(3).
- b. An affected coating booth is not subject to limitations and requirements of 35 IAC Part 218, Subpart TT ~~Other Emission Units~~, because plastic parts (fiberglass) coating is exempted from applicability of this subpart [35 IAC 218.980(b)].

7.2.5 Operational and Production Limits and Work Practices

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

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, an affected coating booth is subject to the following:

- a. An affected coating booth is subject to the following limitation of 35 IAC 218.301 when aircraft nose cones coating being performed:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation shall apply only to photochemically reactive material.

- b. An affected coating booth is subject to the following limitation of 35 IAC 218.204(j)(2)(A) when miscellaneous metal parts extreme performance air dried coating being performed:

- i. No owner or operator of an affected coating booth shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which

are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/l</u>	<u>lb/gal</u>
0.42	3.5

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

7.2.7 Testing Requirements

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

- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on affected coating booth shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittees records pursuant to Condition 7.2.9 directly reflect the application of such material and separately account for any additions of solvent.

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected coating booths to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Other Than Nose Cones Coating Operations
 - i. The coating usage (gal/mo and gal/yr).
 - ii. The VOM content of each coating applied, % by wt.
 - iii. Density of each coating applied, lb/gal.

- iv. Cleanup solvent usage (gal/mo and gal/yr) and the density of each solvent applied (lb/gal).
 - v. Records of the testing of VOM content of each coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:
 - A. Identification of material tested;
 - B. Results of analysis;
 - C. Documentation of analysis methodology; and
 - D. Person performing analysis.
- b. Nose Cones Coating Operations
- i. The coating usage (gal/mo and gal/yr).
 - ii. The VOM content of each coating applied, % by wt.
 - iii. Density of each coating applied, lb/gal.
 - iv. Cleanup solvent usage (gal/mo and gal/yr) and the density of each solvent applied (lb/gal).
 - v. Hours of operation per month and per year for this type of coating operations performed.
 - vi. The VOM emissions for verifying compliance with Condition 7.2.6(a) and calculated based on the compliance procedures from Condition 7.2.12.
- c. Total VOM emissions from all type of coating operations performed, in tons/month and tons/year from an affected coating booth for verifying compliance with Condition 5.5.1 and calculated based on the compliance procedures from Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Report of Deviations

If there is an exceedance of the requirements of the limits established in Conditions 5.5.1 and 7.2.6 of this

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

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating booth prior to notification the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.2.7, the source wide emission limitations in Condition 5.5.1 are not exceeded and an affected coating booth remains in compliance with Condition 7.2.6.

7.2.12 Compliance Procedures

- a. Compliance of an affected coating booth with the source wide emission limitations in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.2.9 and the following equation:
 - i. VOM Emissions from Coating Operation (EI),
 $T/\text{mo and T/yr} = \text{Actual Coating Usage (gal/mo)} \times \text{Coating Density (lb/gal)} \times \text{VOM Content of the Coating (wt.\%)}$;
 - ii. VOM Emissions from Cleanup Operation (EII),
 $T/\text{mo and T/yr} = (\text{Actual Clean-up Solvent Usage (gal/mo)} \times \text{Solvent Density (lb/gal)})$; and
 - iii. Total VOM Emissions (T/mo and T/yr) = EI + EII
- b. Compliance of an affected coating booth with VOM emission limitations in Condition 7.2.6(b) shall be based on the recordkeeping requirements in Condition 7.2.9 and by the use of either testing or by use of the formula listed below:

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

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

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

Where:

w_i = Percent exempt compound i in the coating,

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

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

- c. Compliance of an affected coating booth with VOM emission limitations in Condition 7.2.6(a) for nose cones coating shall be based on the recordkeeping requirements in Condition 7.2.9(b) and by the use of the formula listed below:

VOM Emissions, lb/hr = [Actual Coating Usage (gal/mo) x Coating Density (lb/gal) x VOM Content of the Coating (wt.%) + (Actual Clean-up Solvent Usage (gal/mo) x Solvent Density (lb/gal)] / Actual Hours of Operation (hr/mo);

- d. To determine compliance with Condition 5.5.1, emissions of PM/PM-10 from the affected coating booth shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Loading^a, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [1 - (Water Curtain Efficiency* (%) / 100)].

* As specified by manufacturer or vendor of the water curtain.

7.3 Unit 3: Maintenance and Touch-up Coating Activities

7.3.1 Description

Aircraft and ground support equipment maintenance and touch-up coating activities performed manually by paint brush and spray cans.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 3	Maintenance and Touch-up Coating Activities	Aircraft and ground support equipment maintenance and touch-up coating activities Commenced prior to 1972	

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected maintenance and touch-up coating activities" for the purpose of these unit specific conditions is an operations for maintaining the proper operation of aircraft and ground support equipment.
- b. An affected maintenance and touch-up coating activities are subject to the limitation of 35 IAC Part 218, Subpart G ~~A~~Use of organic material~~@~~. This limitation is described further in Conditions 7.3.6.

7.3.4 Non-Applicability of Regulations of Concern

An affected maintenance and touch-up coating activities are not subject to limitations and requirements of 40 CFR Part 63, Subpart GG ~~A~~National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities~~@~~, for the following reasons:

- a. This plant is not a major source of HAPs as defined in 63.2; and
- b. This plant is not engaged in the manufacture or rework of commercial, civil, or military aerospace vehicles or components pursuant to 63.741 (a).

7.3.5 Operational and Production Limits and Work Practices

None

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, an affected maintenance and touch-up coating activities are subject to the following:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation shall apply only to photochemically reactive material.

7.3.7 Testing Requirements

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

- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on affected maintenance and touch-up coating activities shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.3.9 directly reflect the application of such material and separately account for any additions of solvent.

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected maintenance and touch-up coating activities to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. The VOM content of coatings, % by Wt;
- b. Density of each applied coating and cleanup solvent, in units lb/gal;

- c. The usage of each coating and clean-up solvent, in units of gallons/month and gallons/year;
- d. Records of the testing of VOM content of each coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- e. Hours of operation per month and per year; and
- f. The VOM emissions in tons/month and tons/year from an affected maintenance and touch-up coating activities for verifying compliance with Condition 5.5.1 and calculated based on the compliance procedures from Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Report of Deviations

If there is an exceedance of the requirements of the limits established in Conditions 5.5.1 and 7.3.6 of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected maintenance and touch-up coating activities prior to notification the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely

manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.3.7, the source wide emission limitations in Condition 5.5.1 are not exceeded and an affected maintenance and touch-up coating activities remain in compliance with Condition 7.3.6.

7.3.12 Compliance Procedures

- a. Compliance of an affected maintenance and touch-up coating activities with the source wide emission limitations in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.3.9 and the following equation:

$$\text{Emissions from Coating Operation (EI)} = \text{Actual Coating Usage (gal/mo)} \times \text{Coating Density (lb/gal)} \times \text{VOM Content of the Coating (wt.\%)};$$
$$\text{Emissions from Cleanup Operation (EII)} = (\text{Actual Clean-up Solvent Usage (gal/mo)} \times \text{Solvent Density (lb/gal)}); \text{ and}$$
$$\text{Total VOM Emissions} = \text{EI} + \text{EII}$$

- b. Compliance of an affected maintenance and touch-up coating activities with VOM emission limitations in Condition 7.3.6 shall be based on the recordkeeping requirements in Condition 7.3.9 and by the use of the formula listed below:

$$\text{VOM Emissions, lb/hr} = [\text{Actual Coating Usage (gal/mo)} \times \text{Coating Density (lb/gal)} \times \text{VOM Content of the Coating (wt.\%)} + (\text{Actual Clean-up Solvent Usage (gal/mo)} \times \text{Solvent Density (lb/gal)})] / \text{Actual Hours of Operation (hr/mo)};$$

7.4 Unit 4: Gasoline Storage Tanks

7.4.1 Description

Nine gasoline storage tanks are associated with gasoline non-retail dispensing operations for the airport vehicles.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 5	Gasoline Storage Tanks	<p><u>Service Center, SW</u> <u>Service Island:</u> Tank #18 - 10,000 gal capacity Tank #21 - 2,500 gal capacity <u>Terminal One, Gate B17:</u> Tank #32 - 15,000 gal capacity <u>Terminal One, Gate B2:</u> Tank #43 - 15,000 gal capacity <u>Terminal One, Gate C16:</u> Tank #33 - 15,000 gal capacity <u>Terminal One, Gate C15:</u> Tank #35 - 15,000 gal capacity <u>Line Service, Service Island:</u> Tank #54 & 55 - 15,000 gal capacity each <u>Southwest Cargo:</u> Tank #56 - 15,000 gal capacity</p> <p>Construction Dates: #18, 21, 54, 55 - 1993 #32, 43, 33, 35, 56 - 1988</p>	All tanks equipped with a submerged loading pipe and pressure/vacuum relief valve

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected gasoline storage tank" for the purpose of these unit specific conditions is used for non-retail dispensing of airport vehicles.
- b. Each affected gasoline storage tank is subject to 35 IAC 218.122(b) and 218.583(a),(c) & (d). These requirements are discussed further in Condition 7.4.5.

7.4.4 Non-Applicability of Regulations of Concern

The gasoline dispensing operations are exempt from permit requirements for its vapor collection and control systems since the Permittee has submitted to the Illinois EPA a registration of the vapor collection and control systems within 30 days of completion of installation [35 IAC 218.586(h)].

7.4.5 Operational and Production Limits, and Work Practices

- a. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 218.122(b)].
- b. No person shall cause or allow the transfer of gasoline from any delivery vessel into the stationary storage tank at a gasoline dispensing operations unless [35 IAC 218.583(a)]:
 - i. The tank is equipped with a submerged loading pipe; and
 - ii. The vapors displaced from the storage tank during filling and processed by a vapor control system that includes one or more of the following:
 - A. A vapor collection system that meets the requirements of 218.583(d)(4); or
 - B. A refrigeration-condensation system or any other system approved by the Illinois EPA and approved by the USEPA as a SIP revision, that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled; and
 - C. The delivery vessel displays the appropriate sticker pursuant to the requirements of Section 218.584(b) or (d).
 - iii. All tank vent pipes are equipped with pressure/vacuum relief valves and shall be set to resist a pressure of at least 3.5 inches water column and to resist a vacuum of no less than 6.0 inches water column.
- c. Each owner of a gasoline dispensing operation shall [35 IAC 218.583(c)]:

- i. Install all control systems and make all process modifications required by 35 IAC 218.583(a);
 - ii. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system; and
 - iii. Repair, replace or modify any worn out or malfunctioning component or element of design.
- d. Each operator of a gasoline dispensing operation shall [35 IAC 218.583(d)]:
- i. Maintain and operate each vapor control system in accordance with the owner's instructions;
 - ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system;
 - iii. Maintain gauges, meters or other specified testing devices in proper working order;
 - iv. Operate the vapor collection system and delivery vessel unloading points in a manner that prevents:
 - A. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B incorporated by reference in Section 218.112 of this Part; and
 - B. Avoidable leaks of liquid during the filling of storage tanks.
 - v. Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of Condition 7.4.5(d)(iv)(A).

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the storage tank to demonstrate compliance with Condition 5.5.1 and Condition 7.4.4(a) pursuant to Section 39.5(7)(b) of the Act, 35 IAC 218.129(f), and 35 IAC 218.586(h)(3):

- a. A copy of the registration information is maintained at the gasoline dispensing operation;
- b. Readily accessible records of dimensions and analysis of the capacity of each storage tank and test results;
- c. Monthly and annual gasoline throughput (gallons/month and gallons/year); and
- d. Total monthly and annual emissions of VOM calculated based on the compliance procedures in Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(iii) of the Act:

Upon the modification of an existing vapor collection and control system, the owner or operator of the gasoline dispensing operation submits to the Illinois EPA a registration that details the changes to the information provided in the previous registration of the vapor collection and control system and which includes the signature of the owner or operator. The registration must be submitted to the Illinois EPA within 30 days of completion of such modification [35 IAC 218.586(h)(4)].

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

To determine compliance with Conditions 5.5.1 and 7.4.6, VOM emissions from the storage tank(s) shall be calculated based on the following equation and standard emission factor for a Stage II vapor control systems established in AP-42, Table 5.2-7, AEvaporative Emissions from Gasoline Service Station Operations:

Emissions (lb) = Gasoline throughput (gal) x 3.1 lb/1000
gal throughput

7.5 Unit 5: Natural Gas Combustion Units

7.5.1 Description

Natural gas combustion units (boilers and heaters) located at the source are used to produce heat for production and comfort purposes.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 5	Natural Gas Combustion Units	<p><u>Hangar 5/5A</u> Three boilers with the maximum heating capacity of each boiler 8.4 MBtu/hr Construction Dates: 1960 and 1964</p>	None
		<p><u>Hangar 5B</u> One boiler with the maximum heating capacity 3.1 MBtu/hr Construction Dates: 1965</p>	None
		<p><u>Line Service</u> One roof heater with the maximum heating capacity 10.4 MBtu/hr Construction Dates: 1977</p>	None
		<p><u>L Check</u> Three wing heaters with the maximum heating capacity of each heater 5.0 MBtu/hr Construction Dates: 1980s</p>	None
		<p><u>Service Center</u> Four boilers with the maximum heating capacity of each boiler 25.1 MBtu/hr Construction Dates: 1968</p>	None
		<p><u>Southwest Cargo</u> Six heaters with the maximum heating capacity of each heater 2.8 MBtu/hr Construction Dates: 1988</p>	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler or heater" for the purpose of these unit specific conditions is a natural gas-fired

boiler/heater which is used to produce heat for production and comfort purposes.

- b. Affected boilers and heater (located at the Service Center and Line Service) are subject to 35 IAC 216.121. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 MBtu/hr) to exceed 200 ppm, corrected 50 percent excess air.

7.5.4 Non-Applicability of Regulations of Concern

- a. Each affected boiler and heater 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 each boiler and heater is less than 73.2 MW (250 MBtu/hr).
- b. Each affected boiler and heater (except than located at the Service Center and Line Service areas) is not subject to 35 IAC 216.121, Fuel Combustion Emission Sources, because the actual heat input from each such boiler and heater is less than 2.9 MW (10 MBtu/hr).
- c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

7.5.5 Operational and Production Limits and Work Practices

Each affected boiler and heater shall only be operated with natural gas as the fuel.

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected boilers and heaters are subject to the following:

None

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

Total natural gas usage (therms/month and therms/year or mmscf/month and mmscf/year) for all affected boilers and heaters.

7.5.10 Reporting Requirements

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

Emissions of the regulated air pollutants from the natural gas combustion units in excess of the limits specified in Conditions 5.5.1 and based on the 12 month rolling period within 30 days of such an occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

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

- a. Compliance with Condition 7.5.3(b) is assumed to be achieved by work-practices inherent in operation of natural gas-fired boilers and heaters, so that no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with the emission limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

Maximum heating capacity < 100 MBtu/hr for each boiler and heater:

<u>Pollutant</u>	<u>Natural Gas Emission Factors (lb/10⁶ ft³)</u>
PM	7.6
NO _x	100
SO ₂	0.6
VOM	5.5

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

Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

7.6 Unit 6: Internal Combustion Engine

7.6.1 Description

One emergency diesel fuel-fired internal combustion engine is used in cases of power loss.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 6	Internal Combustion Engine	One emergency diesel fuel-fired internal combustion engine with a power output of 1750 KW (6.0 MBtu/hr). Date of Construction: 1989	None

7.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected engine" for the purpose of these unit specific conditions is an emergency diesel fuel-fired internal combustion engine which is used in cases of power loss.
- b. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hr (8 lb/hr) from any engine, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].
- c.
 - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.
 - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted

from each such emission unit shall be limited to 3 times in any 24 hours [35 IAC 212.123].

7.6.4 Non-Applicability of Regulations of Concern

None

7.6.5 Operational and Production Limits, and Work Practices

a. Diesel fuel shall be the only fuel used in the engine.

b. Startup Provisions

The Permittee is authorized to operate an affected engine in violation of the applicable limit of Condition 7.6.3(c) (i.e., 35 IAC 212.123) during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

i. This authorization only extends for a period of up to two-hours following initial firing of diesel fuel during each startup event; and

ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups and minimize the frequency of startups:

A. Implementation of established startup procedures, including preheating an engine prior to startup when sufficient time is available; and

B. Operating the engine as peaking units.

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the affected engine is subject to the following:

Emissions and operation of the affected engine shall not exceed the following limits:

Hours of Operation (hr/yr)	E M I S S I O N S					
	NOx (lb/hr) (T/yr)			PM (lb/hr) (T/yr)		SO ₂ (lb/hr) (T/yr)
500	19.2	4.8	0.6	0.15	1.02	0.26

These limits are based on the maximum design capacity, operating parameters of affected engine and the following standard emission factors for large stationary diesel-fired internal combustion engines established in AP-42, 3.4-1: NO_x - 3.2 lb/MBtu, PM - 0.1 lb/MBtu, SO₂ - 1.01S lb/MBtu. The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and 40 CFR 52.21. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit emissions from the engines below the levels that would trigger the applicability of these rules consistent with the information provided in the CAAPP application [T1N]. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.6.7 Testing Requirements

- a. Within 45 days of a written request by the Illinois EPA, the Permittee shall have the opacity of the affected engines determined by a certified observer in accordance with USEPA Test Method 9 during representative operating conditions of the engines as specified by the Illinois EPA. Illinois EPA may require such observations if, based on its observations, the opacity of the engines does not comply with 35 IAC 212.123, or engines are poorly maintained or operated so as to make compliance with 35 IAC 212.123.
- b.
 - i. The Permittee shall notify the Illinois EPA at least 15 days in advance of the date and time of observations, in order to allow the Illinois EPA to witness the observations. This notification shall include the name and employer of the certified observer(s) and identify any concerns for successful completion of observations, i.e., lack of suitable point for proper observation or inability to conduct observations under specified conditions;
 - ii. The Permittee shall promptly notify the Illinois EPA of any changes in the date and time of observation; and
 - iii. The Permittee shall provide a copy of its observers readings to the Illinois EPA at the time of observations, if Illinois EPA personnel are present at the conclusion of observations.

c. The Permittee shall submit a written report for these observations within 15 days of the date of observation. Pursuant to Section 39.5(7)(e) of the Act, this report shall include:

- i. The date, place, and time of sampling or measurements;
- ii. The company or entity that performed the analysis;
- iii. The analytical techniques or methods used;
- iv. The operating conditions as existing at the time of sampling or measurement; and
- v. The results of such analyses.

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1 and 7.6.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Annual NO_x, PM, and SO₂ emissions from the engine, based on the hours of operation per year and the applicable emission factors, with supporting calculations;
- b. Hours of operation per year;
- c. Sulfur content (wt.%) in the fuel;
- d. Records for each startup of an engine, that, as a minimum, shall include:
 - i. Date and type of startup, i.e., exercise of engine or startup to generate electricity;
 - ii. Duration of the startup, i.e. start time and time startup discontinued or normal operation achieved, i.e., stable operation at load;
 - iii. The nature of opacity, i.e., severity and duration, during the startup and the nature of opacity at the conclusion of startup, if above normal;

- iv. Whether exceedance of Condition 5.2.2(c) may have occurred during startup, with explanation and estimated duration (minutes); and
 - v. For startup to generate electricity: if normal operation was not achieved within 1 hour, an explanation why startup could not be achieved in one hour; a detailed description of the startup, including reason for operation and whether preheat or reduced loading was performed; and explanation why preheat, reduced loading, and other established startup procedures could not be performed, if not performed.
- e. Maintenance and repair log for an affected engine, listing each activity performed with date.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of non-compliance with the operating requirements and emissions of VOM as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. The total emissions of PM, NO_x and SO₂ from the engine in excess of the limits specified in Conditions 5.5.1 and 7.6.6 and calculated by using emission factors and equation from compliance procedures in Condition 7.6.12 and based on the current months records plus the preceding 11 months within 30 days of such an occurrence;
- b. Notification within 60 days of operation of an engine that may not have been in compliance with the opacity limitations of Condition 5.2.2(c), as determined from the records required by Condition 7.6.9(b), with a copy of such record for each incident; and
- c. Reporting for Startups of Engines

The Permittee shall provide an annual report, submitted with the Annual Emission Report, to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to Section 39.5(7)(b) of the Act, concerning startup of the engine. At a minimum, this report shall include:

- i. The total number of startups to generate electricity and the total number of such startups that may have resulted in opacity in excess of Condition 5.2.3(c) (i.e., 35 IAC 212.123); and

- ii. The estimated duration of excess opacity during startup, minutes/year.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

- a. Compliance with Condition 7.7.3(b) is assumed to be achieved by the work-practices inherent in the operation of affected engine, so that no compliance procedures are set in this permit addressing this regulation; and
- b. Compliance with the emission limits in Condition 5.5.1 and 7.7.6 shall be based on the recordkeeping requirements in Condition 7.7.9 and calculated based on the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factors</u> <u>(lb/MBtu)</u>
PM	0.1
NO _x	3.2
SO ₂	1.01S*

* % sulfur in fuel oil

These emission factors are based on the uncontrolled emissions from the large stationary diesel industrial internal combustion engines established in AP-42, Table 3.4-1, October 1996.

Emissions (lb) = Power output (MBtu) x Hours of operation x Emission factor.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after October 13, 1998 unless the 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, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written

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

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in the 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 the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

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

8.6.3 Test Reports

Unless otherwise specified elsewhere in the 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:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;

- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

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

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153
 - iii. Illinois EPA - Air Permit Section (MC 11)

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

United States EPA (AR - 17J)
Air & Radiation Branch (Illinois - Indiana)
77 W. Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the Clean Air Act, 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 Clean Air Act; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of 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 the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

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

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

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 the permit. [Section 39.5(7)(e)(ii) of the Act]
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field

Office, and USEPA Region 5 **B** 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 a CAAPP permit shall contain certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(k) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defenses to Enforcement Action

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 operation logs, or other relevant evidence:
 - i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;

- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working day 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 the permit.
- b. This provision is in addition to any emergency or upset provisions contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless the 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 the permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

The 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 the permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of the permit; and
- d. The Illinois EPA or USEPA determines that the permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(a)(iii) 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 the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period

until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(1) and (n) of the Act]

1s0.0 ATTACHMENTS

10.1 Attachment 1

10.1.1 Process Emission Units for Which Construction or Modification Commenced Prior to 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 prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable emission rates specified in the following equation:

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

Where:

P = Process weight rate;

E = Allowable emission rate; and,

- i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

- c. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

<u>Metric</u>		<u>English</u>	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.1.2 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; and,

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

	<u>Metric</u>	<u>English</u>
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):

	<u>Metric</u>	<u>English</u>
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)]:

<u>Metric</u>		<u>English</u>		
P	E	P	T/hr	E
Mg/hr	kg/hr			lb/hr
0.05	0.25		0.05	0.55
0.1	0.29		0.10	0.77
0.2	0.42		0.2	1.10
0.3	0.64		0.30	1.35
0.4	0.74		0.40	1.58
0.5	0.84		0.50	1.75
0.7	1.00		0.75	2.40
0.9	1.15		1.00	2.60
1.8	1.66		2.00	3.70
2.7	2.1		3.00	4.60
3.6	2.4		4.00	5.35
4.5	2.7		5.00	6.00
9.0	3.9		10.00	8.70
13.0	4.8		15.00	10.80
18.0	5.7		20.00	12.50
23.0	6.5		25.00	14.00

27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

AB:psj

10.3 Attachment 3 Guidance on Revising This Permit

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

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

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

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing

monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

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

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

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

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

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



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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

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

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

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

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

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

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

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

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

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

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