

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Automotive Technology Systems, LLC
Attn: Scott Moan
100 Trim Masters Drive
Lawrenceville, Illinois 62439

Application No.: 03120061 I.D. No.: 101015AAT
Applicant's Designation: Date Received: December 30, 2003
Subject: Interior Auto Parts Manufacturing
Date Issued: December 1, 2004 Expiration Date: December 1, 2009
Location: 100 Trim Masters Drive, Lawrenceville

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 4 spray booths with filters (base, fabric, power window, manual window) painting touch-up area, 4 spray booths with filters (vacuum forming, front, rear, and leather assy), emergency diesel generator and fire pump, natural gas space heaters and 2 diesel fuel storage tanks and plastic injection molding with 3 storage silos as described in the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit emissions from the source to less than major source thresholds, (i.e., to less than 100 tons per year of volatile organic material (VOM), 25 tons per year for combined HAPs and 10 tons per year for each single HAP), as further described in Attachment A. As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Emissions and operation of the generator, and fire pump shall not exceed the following limits:

Operating Hours (Hours/Yr)	NO _x		E M I S S I O N S CO		S O ₂		N O _x		VOM	
	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
500	1.9	19.2	0.4	4	0.16	1.6	0.09	0.9		

These limits are based on maximum generator rating of 2,867 Hp, standard AP-42 emission factors from Sections 3.3 and 3.4, and 0.3 percent sulfur content to show compliance with 35 Ill. Adm. Code 214.122(b)(2). Compliance shall be determined from a running total of the previous 12 months data.

- b. Emissions and operation of the space heaters shall not exceed the following limits:

Total Heat Input (mmBtu/Hr)	NO _x (T/Mo)	E M I S S I O N S (T/Yr)	CO (T/Mo)	(T/Yr)	VOM (T/Mo)	(T/Yr)
20	0.9	8.6	0.7	7.2	0.05	0.5

3. At the above location, the Permittee shall not keep, store, or utilize:
- a. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values:
- i. 0.28 weight percent, or
 - ii. The wt. percent given by the formula: Maximum wt. percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).
4. Organic liquid by-products or waste materials shall not be used in any fuel combustion emission source without written approval from the Illinois EPA.
5. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
6. The Permittee shall notify the Illinois EPA prior to any change in the type of fuel used at the source.
7. Natural gas and distillate fuel oil shall be the only fuel(s) fired in the above referenced space heaters, and generator and fire pump, respectively.
- 8a. Emissions and operation of the 8 spray booths, including clean-up, shall not exceed the following:

	Volatile Organic Material (VOM) Usage and Emissions	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
4 Booths (Base, Fabric, Power and Manual Window)	1.7	16.5
4 Booths (Vacuum Forming, Front, Rear and Leather Assy)	6.5	64.4

These limits define the potential emissions and are based on maximum material usage rates, material reclaimed and shipped off-site, VOM content, and continuous operation (8,760 hr/yr). Compliance with annual limits shall be determined from a running total of 12 months of data.

- b. This permit is issued based on actual emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act being less than 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such less quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program (CAAPP) permit from the Illinois EPA.
- 9a. This permit is issued based on negligible emissions of VOM from plastic injection molding with 3 storage silos. For this purpose, emissions from these units shall not exceed a total of 0.1 lb/hr and 0.44 tons/year.
- b. This permit is issued based on negligible emissions of VOM from the 2 diesel fuel storage tanks. For this purpose, emissions from these units shall not exceed a total of 0.1 lb/hr and 0.44 tons/year.
- 10a. VOM usage and emissions of the paint touch-up area, including clean-up, shall not exceed 0.13 tons/month and 1.3 tons/year. This is based on maximum paint usage and VOM contents. Compliance with annual limits shall be determined from a running total of 12 months of data.
- b. This permit is issued based on negligible emissions of particulate matter (PM) from the use of all materials. For this reason, emissions shall not exceed nominal rates of 0.1 lb/hr and 0.44 tons/year.
- 11. The Permittee shall maintain records of the following items for the source:
 - a. Amounts of adhesives and hardeners purchased (tons/month and tons/year);
 - b. VOM and HAP contents of all adhesives and hardeners (weight %);
 - c. Amount of waste reclaimed and shipped off-site and VOM and HAP contents (tons/month and tons/year, weight %);
 - d. Operating hours of generator fire pump (hours/year);
 - e. Sulfur content of diesel fuel (% by weight);
 - f. Touch-up paint used (tons/month and tons/year);
 - g. VOM and HAP contents of touch-up paint (weight %);
 - h. Clean-up solvent used (tons/month and tons/year); and
 - i. VOM, HAP and NO_x emissions with supporting calculations (tons/month and tons/year).

12. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
13. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Agency'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.
14. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

15. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: generator operating hours, amounts of all materials purchased and reclaimed per year containing VOM, HAPs, and sulfur and their respective contents.

Please note that the testing lab and welding room are exempt from state permitting requirements, pursuant to 35 Ill. Adm. Code 210.146(f) and (y), respectively.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

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

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cc: Illinois EPA, FOS, Region 3
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the interior auto parts manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant (this is handling 200 tons/yr of adhesives and hardeners and 500 operating hours/yr for a 2,867 Hp generator). The resulting maximum emissions are below the levels, (e.g., 25 tons per year of hazardous air pollutants (HAPs), 10 tons per year of each single HAP and 100 tons per year of volatile organic material (VOM)) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Equipment</u>	E M I S S I O N S (Tons/Year)					HAPs	
	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>PM</u>	<u>VOM</u>	<u>Single</u>	<u>Combined</u>
4 Booths (Base, Fabric, Power and Manual Window)					16.5		
4 Booths (Vacuum Forming, Front, Rear and Leather Asst.)					64.4		
Generator, Fire Pump and Space Heaters, 2 Diesel Storage Tanks	19.4	4.0	1.6		1.8		
Paint Touch-Up Area					1.3		
Plastic Injection Molding with 3 Storage Silos					0.44		
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Totals:	19.4	4.0	1.6	0.44	84.5	< 10	< 25

RBS:psj