

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE -- RENEWAL

PERMITTEE

Dana Automotive Systems Group LLC  
Attn: Bruce Tiejema  
1945 Ohio Street  
Lisle, Illinois 60532

<u>Application No.:</u> 96030034	<u>I.D. No.:</u> 043055AAX
<u>Applicant's Designation:</u>	<u>Date Received:</u> July 6, 2007
<u>Subject:</u> Gasket and Engine Testing Facility	
<u>Date Issued:</u> February 26, 2014	<u>Expiration Date:</u> February 26, 2024
<u>Location:</u> 1945 Ohio Street, Lisle, DuPage County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of eight (8) gasoline/diesel engine testing cells (up to 1,500 hp engines), one (1) 5,940 gallon gasoline storage tank, and one (1) air sparge and soil vapor extraction (ASSVE) system pursuant to 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 the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Carbon Monoxide (CO)). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. The 5,940 gallon gasoline storage tank is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subparts A and CCCCCC. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 63.11111(a), the affected source to which 40 CFR 63 Subpart CCCCCC applies is each GDF that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.
  - b. Pursuant to 40 CFR 63.11111(b), if your GDF has a monthly throughput of less than 10,000 gallons of gasoline, you must comply with the requirements of 40 CFR 63.11116.

- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), 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 meter (1000 foot) 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 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- 4a. Pursuant to 35 Ill. Adm. Code 214.122(b)(2), no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any new fuel combustion source with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hour), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hour of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu).
- b. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- c. Pursuant to 35 Ill. Adm. Code 214.304, the emissions from the burning of fuel at process emission sources located in the Chicago or St. Louis (Illinois) major metropolitan areas shall comply with applicable 35 Ill. Adm. Code 214 Subparts B through F (i.e., 35 Ill. Adm. Code 214.122(b)).
- 5a. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).

- b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall only apply to photochemically reactive material.
  
- d. Pursuant to 35 Ill. Adm. Code 218.583(a), subject to 35 Ill. Adm. Code 218.583(b), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless:
  - i. The tank is equipped with a submerged loading pipe; and
  - ii. The vapors displaced from the storage tank during filling are processed by a vapor control system that includes one or more of the following:
    - A. A vapor collection system that meets the requirements of subsection (d)(4) below: or
    - B. A refrigeration-condensation system or any other system approved by the Agency 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) of this Part; and
  - iii. By March 15, 1995, all tank vent pipes are equipped with pressure/vacuum relief valves with the following design specifications:
    - A. The pressure/vacuum relief valve 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 of water column; or
    - B. The pressure/vacuum relief valve shall meet the requirements of 35 Ill. Adm. Code 218.586(c).
  
- 6a. This permit is issued based on the engine test cells not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subpart ZZZZ. Pursuant to 40 CFR 63.6585, you are subject to 40 CFR 63 Subpart ZZZZ if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

- b. This permit is issued based upon the air sparge and soil vapor extraction (ASSVE) system not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Site Remediation, 40 CFR Part 63 Subpart GGGGG because this source is not a major source of HAP as defined in 40 CFR 63.2.
- c. This permit is issued based on the engine test cells not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants for Engine Test Cells/Standards, 40 CFR 63 Subpart PPPPP because this source is not a major source of Hazardous Air Pollutant (HAP) emissions.
- 7. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 8a. This permit is issued based on the 5,940 gallon gasoline storage tank not being subject to 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL) because the capacity is less than 40,000 gallons. Pursuant to 35 Ill. Adm. Code 218.119(g), the limitations of 35 Ill. Adm. Code 218.120 shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gal) capacity or greater, except to vessels with storage capacity less than 40,000 gallons must comply with 35 Ill. Adm. Code 218.129(f).
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- 9a. Pursuant to 40 CFR 63.11116(a), you must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
  - i. Minimize gasoline spills;
  - ii. Clean up spills as expeditiously as practicable;
  - iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and

- iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- b. Pursuant to 40 CFR 63.11130, Table 3 to 40 CFR 63 Subpart CCCCCC (see also Attachment B) shows which parts of the General Provisions apply to you.
- 10a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and

- vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 11a. Pursuant to 35 Ill. Adm. Code 218.583(c), subject to 35 Ill. Adm. Code 218.583(b), each owner of a gasoline dispensing operation shall:
  - i. Install all control systems and make all process modifications required by 35 Ill. Adm. Code 218.583(a) above;
  - 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.
- b. Pursuant to 35 Ill. Adm. Code 218.583(d), subject to 35 Ill. Adm. Code 218.583(b), each operator of a gasoline dispensing operation shall:
  - 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; and
    - B. Avoidable leaks of liquid during the filling of storage tanks; and
  - v. Within 15 business days after discovery of the leak by the owner, operator, or the Agency, repair and retest a vapor collection system which exceeds the limits of 35 Ill. Adm. Code 218.583(d)(4)(A).

- 12a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The engine test cells shall only be operated with gasoline or distillate fuel oil as the fuel. The use of any other fuel in the engine test cells requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- c. The Permittee shall not keep, store, or use distillate fuel oil (Grades No. 1 and 2) at this source 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).
- d. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources without written approval from the Illinois EPA.
- e. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 13a. Emissions and operation of eight engine test cells combined shall not exceed the following limits:

i. Diesel Fuel Mode:

Fuel Usage		Emission Factors		Emissions	
(Gal/Mo)	(Gal/Yr)	Pollutant	(lbs/1,000 Gal)	(Tons/Mo)	(Tons/Yr)
18,000	180,000	CO	128.3	1.16	11.60
		NO <sub>x</sub>	595.4	5.36	53.60
		PM	41.9	0.38	3.80
		SO <sub>2</sub>	39.2	0.36	3.60
		VOM	48.6	0.44	4.40

These limits are based on the maximum fuel usage, 135,000 btu/gallon and standard emission factors (Table 3.4-1, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

ii. Gasoline Fuel Mode:

Fuel Usage		Emission Factors		Emissions	
(Gal/Mo)	(Gal/Yr)	Pollutant	(lbs/1,000 Gal)	(Tons/Mo)	(Tons/Yr)
9,100	91,000	CO	1,700.00	7.74	77.40
		NO <sub>x</sub>	202.90	0.93	9.30

Fuel Usage		Emission Factors		Emissions	
(Gal/Mo)	(Gal/Yr)	Pollutant	(lbs/1,000 Gal)	(Tons/Mo)	(Tons/Yr)
		PM	12.45	0.06	0.60
		SO <sub>2</sub>	5.31	0.02	0.24
		VOM	148.00	0.67	6.73

These limits are based on the maximum fuel usage and standard emission factors (Table 3.4-1, AP-42, Fifth Edition, Volume I, Supplement D, July 1998), and CO emission factors for mobile sources.

- b. This permit is issued based on negligible emissions of Volatile Organic Material (VOM) from the 5,940 gallon gasoline storage tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year. These limits are based on the maximum annual throughput (167,000 gallons/year) and emissions calculated using USEPA's Tanks software.
- c. Emissions and operation of the air sparge/soil vapor extraction (ASSVE) system shall not exceed the following limits:

VOM Emissions	
(Tons/Month)	(Tons/Year)
0.7	7.0

These limits are based on 35 Ill. Adm. Code 218.301 and information in the application. Emissions shall be calculated using the following equation:

$$\text{Emissions (tons)} = \frac{\left[ \begin{array}{l} \text{Total SVE System VOM/HAP} \\ \text{Exhaust Contaminant} \\ \text{Concentration} \\ \text{(ppmv)} \times \text{SVE System} \\ \text{Exhaust Flowrate (scfm)} \\ \times \text{'VARIABLE' lb/lb - Mole} \\ \times 60 \text{ min/hour} \end{array} \right]}{387 \text{ cu ft/lb - Mole} \times 1,000,000} \times \frac{\text{Hours Operated}}{2000} \div \frac{\#}{\text{Ton}}$$

- d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 14. This permit is issued based on the Potential to Emit (PTE) for Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 15a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 16 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 16. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or

visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

17. Pursuant to 35 Ill. Adm. Code 218.583(a)(4), subject to 35 Ill. Adm. Code 218.583(b), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless the owner or operator of a gasoline dispensing operation demonstrates compliance with 35 Ill. Adm. Code 218.583(a)(3), by March 15, 1995 or 30 days after installation of each pressure/vacuum relief valve, whichever is later, and at least annually thereafter, by measuring and recording the pressure indicated by a pressure/vacuum gauge at each tank vent pipe. The test shall be performed on each tank vent pipe within two hours after product delivery into the respective storage tank. For manifold tank vent systems, observations at any point within the system shall be adequate. The owner or operator shall maintain any records required by this subsection for a period of three years.
18. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
19. Pursuant to 40 CFR 63.11116(b), you are not required to submit notifications or reports, but you must have records available within 24

hours of a request by the Illinois EPA or USEPA to document your gasoline throughput.

20. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
21. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- 22a. Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Diesel fuel usage in the test cells (gallons/month and gallons/year);
  - ii. Gasoline fuel usage in the test cells (gallons/month and gallons/year).
  - iii. The sulfur content of the distillate fuel oil used in the engine test cells (percent by weight) , this shall be recorded for each shipment of oil delivered to the source;
  - iv. Gasoline throughput of the 5,940 gallon gasoline storage tank (gallons/month and gallons/year);
  - v. Measured exhaust total VOM and HAP contaminant concentration (ppmv) in exhaust air flow samples exhausting the SVE system. These samples and measurements shall be taken once every quarter unless the system is shut down for the entire quarter. If the system is down for more than one month, you must perform the quarterly sampling within 24 hours of startup. The Permittee may measure exhaust total VOM and HAP contaminant concentration (ppmv) in exhaust air using an appropriately calibrated photo or flame ionization detector on a quarterly basis.
  - vi. Exhaust air flow rate (dscfm) from the SVE system once quarterly. If the system is down for more than one month, you must perform the quarterly sampling within 24 hours of startup;
  - vii. Hours of operation of the SVE system (hours/month and hours/year); and

- viii. Monthly and annual CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOM emissions from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any record retained in an electronic format (e.g., computer storage device) 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 or USEPA request for records during the course of a source inspection.
23. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 24a. If there is an exceedance of or a deviation from the requirements 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 or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, and a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce the emissions and future occurrences.
- b. Two (2) copies of required reports and notifications 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  
9511 West Harrison  
Des Plaines, Illinois 60016

It should be noted that the 2.24 mmBtu/hour natural gas/distillate fuel oil-fired boiler, the gasket coating operation, the 227 hp diesel-powered emergency generator, the gasket silk screening operation, the 11,450 gallon diesel storage tank, and the gasket cutting operation are exempt from permitting, pursuant to 35 Ill. Adm. Code 201.146(d), (g), (i), (m), (n), (aa), respectively.

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If you have any questions on this permit, please call German Barria at 217/785-1705.

Raymond E. Pilapil  
Acting Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

REP:GB:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

## Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from operation of gasket and engine testing facility 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. The resulting maximum emissions are below the levels (e.g., 100 tons/year for CO) 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>Emission Unit:</u>	E M I S S I O N S (Tons/Year)				
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>
8 Engine test Cells					
Diesel	11.60	53.60	3.80	3.60	4.40
Gasoline	77.40	9.30	0.60	0.24	6.73
Gasoline Storage Tank					0.44
Air Sparge/Soil Vapor					
Extraction (ASSVE) System	-----	-----	-----	-----	<u>7.00</u>
Totals:	<u>89.00</u>	<u>62.90</u>	<u>4.40</u>	<u>3.84</u>	<u>18.57</u>

## Attachment B - Table 3 to 40 CFR 63 Subpart CCCCC - Applicability of General Provisions

Citation	Subject	Brief description	Applies to subpart CCCCC
§63.1	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions, notifications	Yes, specific requirements given in 40 CFR 63.11111.
§63.1(c) (2)	Title V Permit	Requirements for obtaining a Title V permit from the applicable permitting authority	Yes, 40 CFR 63.11111(f) of subpart CCCCC exempts identified area sources from the obligation to obtain title V operating permits.
§63.2	Definitions	Definitions for part 63 standards	Yes, additional definitions in 40 CFR 63.11132.
§63.3	Units and Abbreviations	Units and abbreviations for part 63 standards	Yes.
§63.4	Prohibited Activities and Circumvention	Prohibited activities; Circumvention, severability	Yes.
§63.5	Construction/Reconstruction	Applicability; applications; approvals	Yes, except that these notifications are not required for facilities subject to 40 CFR 63.11116
§63.6(a)	Compliance with Standards/Operation & Maintenance-Applicability	General Provisions apply unless compliance extension; General Provisions apply to area sources that become major	Yes.
§63.6(b) (1)-(4)	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for CAA section 112(f)	Yes.
§63.6(b) (5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance Dates for New and Reconstructed Area Sources That Become Major	Area sources that become major must comply with major source standards immediately upon becoming major, regardless of whether required to comply when they were an area source	No.
§63.6(c)(1)-(2)	Compliance Dates for Existing Sources	Comply according to date in 40 CFR 63 Subpart CCCCCC, which must be no later than 3 years after effective date; for CAA section 112(f) standards, comply within 90 days of effective date unless compliance extension	No, 40 CFR 63.11113 specifies the compliance dates.
§63.6(c)(3)-(4)	[Reserved]		
§63.6(c)(5)	Compliance Dates for Existing Area Sources That Become Major	Area sources that become major must comply with major source standards by date indicated in 40 CFR 63 Subpart CCCCCC or by equivalent time period (e.g., 3 years)	No.
§63.6(d)	[Reserved]		
63.6(e)(1)(i)	General duty to minimize emissions	Operate to minimize emissions at all times; information Administrator will use to determine if operation and maintenance requirements were met.	No. See 40 CFR 63.11115 for general duty requirement.
63.6(e)(1)(ii)	Requirement to correct malfunctions ASAP	Owner or operator must correct malfunctions as soon as possible.	No.
§63.6(e)(2)	[Reserved]		
§63.6(e)(3)	Startup, Shutdown, and Malfunction (SSM) Plan	Requirement for SSM plan; content of SSM plan; actions during SSM	No.
§63.6(f)(1)	Compliance Except During SSM	You must comply with emission standards at all times except during SSM	No.
§63.6(f)(2)-(3)	Methods for Determining Compliance	Compliance based on performance test, operation and maintenance plans, records, inspection	Yes.
§63.6(g)(1)-(3)	Alternative Standard	Procedures for getting an alternative standard	Yes.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.6(h)(1)	Compliance with Opacity/Visible Emission (VE) Standards	You must comply with opacity/VE standards at all times except during SSM	No.
§63.6(h)(2)(i)	Determining Compliance with Opacity/VE Standards	If standard does not State test method, use EPA Method 9 for opacity in Appendix A of part 60 of this chapter and EPA Method 22 for VE in 40 CFR Part 60, Appendix A	No.
§63.6(h)(2)(ii)	[Reserved]		
§63.6(h)(2)(iii)	Using Previous Tests To Demonstrate Compliance With Opacity/VE Standards	Criteria for when previous opacity/VE testing can be used to show compliance with 40 CFR 63 Subpart CCCCCC	No.
§63.6(h)(3)	[Reserved]		
§63.6(h)(4)	Notification of Opacity/VE Observation Date	Must notify Administrator of anticipated date of observation	No.
§63.6(h)(5)(i), (iii)-(v)	Conducting Opacity/VE Observations	Dates and schedule for conducting opacity/VE observations	No.
§63.6(h)(5)(ii)	Opacity Test Duration and Averaging Times	Must have at least 3 hours of observation with 30 6-minute averages	No.
§63.6(h)(6)	Records of Conditions During Opacity/VE Observations	Must keep records available and allow Administrator to inspect	No.
§63.6(h)(7)(i)	Report Continuous Opacity Monitoring System (COMS) Monitoring Data From Performance Test	Must submit COMS data with other performance test data	No.
§63.6(h)(7)(ii)	Using COMS Instead of EPA Method 9	Can submit COMS data instead of EPA Method 9 results even if rule requires EPA Method 9 in 40 CFR Part 60, Appendix A, but must notify Administrator before performance test	No.
§63.6(h)(7)(iii)	Averaging Time for COMS During Performance Test	To determine compliance, must reduce COMS data to 6-minute averages	No.

Citation	Subject	Brief description	Applies to subpart CCCCC
§63.6(h) (7)(iv)	COMS Requirements	Owner/operator must demonstrate that COMS performance evaluations are conducted according to 40 CFR 63.8(e); COMS are properly maintained and operated according to 40 CFR 63.8(c) and data quality as 40 CFR 63.8(d)	No.
§63.6(h) (7)(v)	Determining Compliance with Opacity/VE Standards	COMS is probable but not conclusive evidence of compliance with opacity standard, even if EPA Method 9 observation shows otherwise. Requirements for COMS to be probable evidence-proper maintenance, meeting Performance Specification 1 in 40 CFR Part 60, Appendix B, and data have not been altered	No.
§63.6(h) (8)	Determining Compliance with Opacity/VE Standards	Administrator will use all COMS, EPA Method 9 (in 40 CFR 60, Appendix A), and EPA Method 22 (in 40 CFR Part 60, Appendix A) results, as well as information about operation and maintenance to determine compliance	No.
§63.6(h) (9)	Adjusted Opacity Standard	Procedures for Administrator to adjust an opacity standard	No.
§63.6(i) (1)-(14)	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension	Yes.
§63.6(j)	Presidential Compliance Exemption	President may exempt any source from requirement to comply with 40 CFR 63 Subpart CCCCC	Yes.
§63.7(a) (2)	Performance Test Dates	Dates for conducting initial performance testing; must conduct 180 days after compliance date	Yes.
§63.7(a) (3)	CAA Section 114 Authority	Administrator may require a performance test under CAA section 114 at any time	Yes.
§63.7(b) (1)	Notification of Performance Test	Must notify Administrator 60 days before the test	Yes.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.7(b) (2)	Notification of Re-scheduling	If have to reschedule performance test, must notify Administrator of rescheduled date as soon as practicable and without delay	Yes.
§63.7(c)	Quality Assurance (QA)/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing	Yes.
§63.7(d)	Testing Facilities	Requirements for testing facilities	Yes.
63.7(e) (1)	Conditions for Conducting Performance Tests	Performance test must be conducted under representative conditions	No, 40 CFR 63.11120(c) specifies conditions for conducting performance tests.
§63.7(e) (2)	Conditions for Conducting Performance Tests	Must conduct according to 40 CFR 63 Subpart CCCCCC and EPA test methods unless Administrator approves alternative	Yes.
§63.7(e) (3)	Test Run Duration	Must have three test runs of at least 1 hour each; compliance is based on arithmetic mean of three runs; conditions when data from an additional test run can be used	Yes.
§63.7(f)	Alternative Test Method	Procedures by which Administrator can grant approval to use an intermediate or major change, or alternative to a test method	Yes.
§63.7(g)	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the Notification of Compliance Status; keep data for 5 years	Yes.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.7(h)	Waiver of Tests	Procedures for Administrator to waive performance test	Yes.
§63.8(a)(1)	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard	Yes.
§63.8(a)(2)	Performance Specifications	Performance Specifications in 40 CFR Part 60, Appendix B apply	Yes.
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring of Flares	Monitoring requirements for flares in 40 CFR 63.11 apply	Yes.
§63.8(b)(1)	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative	Yes.
§63.8(b)(2)-(3)	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each affected source or after combined with another affected source before it is released to the atmosphere provided the monitoring is sufficient to demonstrate compliance with the standard; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	No.
§63.8(c)(1)	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with good air pollution control practices	No.
§63.8(c)(1)(i)-(iii)	Operation and Maintenance of Continuous Monitoring Systems (CMS)	Must maintain and operate each CMS as specified in 40 CFR 63.6(e)(1); must keep parts for routine repairs readily available; must develop a written SSM plan for CMS, as specified in 40 CFR 63.6(e)(3)	No.
§63.8(c)(2)-(8)	CMS Requirements	Must install to get representative emission or parameter measurements; must verify operational status before or at performance test	No.

Citation	Subject	Brief description	Applies to subpart CCCCC
§63.8(d)	CMS Quality Control	Requirements for CMS quality control, including calibration, etc.; must keep quality control plan on record for 5 years; keep old versions for 5 years after revisions	No.
§63.8(e)	CMS Performance Evaluation	Notification, performance evaluation test plan, reports	No.
§63.8(f)(1)-(5)	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring	No.
§63.8(f)(6)	Alternative to Relative Accuracy Test	Procedures for Administrator to approve alternative relative accuracy tests for continuous emissions monitoring system (CEMS)	No.
§63.8(g)	Data Reduction	COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that cannot be used in average	No.
§63.9(a)	Notification Requirements	Applicability and State delegation	Yes.
§63.9(b)(1)-(2), (4)-(5)	Initial Notifications	Submit notification within 120 days after effective date; notification of intent to construct/reconstruct, notification of commencement of construction/reconstruction, notification of startup; contents of each	Yes.
§63.9(c)	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology or lowest achievable emission rate	Yes.
§63.9(d)	Notification of Special Compliance Requirements for New Sources	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	Yes.
§63.9(e)	Notification of Performance Test	Notify Administrator 60 days prior	Yes.
§63.9(f)	Notification of VE/Opacity Test	Notify Administrator 30 days prior	No.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.9(g)	Additional Notifications when Using CMS	Notification of performance evaluation; notification about use of COMS data; notification that exceeded criterion for relative accuracy alternative	Yes, however, there are no opacity standards.
§63.9(h)(1)-(6)	Notification of Compliance Status	Contents due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority	Yes, however, there are no opacity standards.
§63.9(i)	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change when notifications must be submitted	Yes.
§63.9(j)	Change in Previous Information	Must submit within 15 days after the change	Yes.
§63.10(a)	Recordkeeping/Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source	Yes.
§63.10(b)(1)	Recordkeeping/Reporting	General requirements; keep all records readily available; keep for 5 years	Yes.
§63.10(b)(2)(i)	Records related to SSM	Recordkeeping of occurrence and duration of startups and shutdowns	No.
§63.10(b)(2)(ii)	Records related to SSM	Recordkeeping of malfunctions	No. See 40 CFR 63.11125(d) for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunction.
§63.10(b)(2)(iii)	Maintenance records	Recordkeeping of maintenance on air pollution control and monitoring equipment	Yes.
§63.10(b)(2)(iv)	Records Related to SSM	Actions taken to minimize emissions during SSM	No.
§63.10(b)(2)(v)	Records Related to SSM	Actions taken to minimize emissions during SSM	No.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.10 (b)(2) (vi)-(xi)	CMS Records	Malfunctions, inoperative, out-of-control periods	No.
§63.10 (b)(2)(xii)	Records	Records when under waiver	Yes.
§63.10 (b)(2) (xiii)	Records	Records when using alternative to relative accuracy test	Yes.
§63.10 (b)(2) (xiv)	Records	All documentation supporting Initial Notification and Notification of Compliance Status	Yes.
§63.10 (b)(3)	Records	Applicability determinations	Yes.
§63.10(c)	Records	Additional records for CMS	No.
§63.10 (d)(1)	General Reporting Requirements	Requirement to report	Yes.
§63.10 (d)(2)	Report of Performance Test Results	When to submit to Federal or State authority	Yes.
§63.10 (d)(3)	Reporting Opacity or VE Observations	What to report and when	No.
§63.10 (d)(4)	Progress Reports	Must submit progress reports on schedule if under compliance extension	Yes.
§63.10 (d)(5)	SSM Reports	Contents and submission	No. See 40 CFR 63.11126(b) for malfunction reporting requirements.
§63.10 (e)(1)-(2)	Additional CMS Reports	Must report results for each CEMS on a unit; written copy of CMS performance evaluation; two-three copies of COMS performance evaluation	No.
§63.10 (e)(3) (i)-(iii)	Reports	Schedule for reporting excess emissions	No.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.10 (e)(3) (iv)-(v)	Excess Emissions Reports	Requirement to revert to quarterly submission if there is an excess emissions and parameter monitor exceedances (now defined as deviations); provision to request semiannual reporting after compliance for 1 year; submit report by 30th day following end of quarter or calendar half; if there has not been an exceedance or excess emissions (now defined as deviations), report contents in a statement that there have been no deviations; must submit report containing all of the information in 40 CFR 63.8(c)(7)-(8) and 63.10(c)(5)-(13)	No.
§63.10 (e)(3) (iv)-(v)	Excess Emissions Reports	Requirement to revert to quarterly submission if there is an excess emissions and parameter monitor exceedances (now defined as deviations); provision to request semiannual reporting after compliance for 1 year; submit report by 30th day following end of quarter or calendar half; if there has not been an exceedance or excess emissions (now defined as deviations), report contents in a statement that there have been no deviations; must submit report containing all of the information in 40 CFR 63.8(c)(7)-(8) and 63.10(c)(5)-(13)	No, 40 CFR 63.11130(K) specifies excess emission events for 40 CFR 63 Subpart CCCCCC.
§63.10 (e)(3) (vi)-(viii)	Excess Emissions Report and Summary Report	Requirements for reporting excess emissions for CMS; requires all of the information in 40 CFR 63.10(c)(5)-(13) and 63.8(c)(7)-(8)	No.
§63.10 (e)(4)	Reporting COMS Data	Must submit COMS data with performance test data	No.

Citation	Subject	Brief description	Applies to subpart CCCCC
§63.10(f)	Waiver for Recordkeeping/Reporting	Procedures for Administrator to waive	Yes.
§63.11(b)	Flares	Requirements for flares	No.
§63.12	Delegation	State authority to enforce standards	Yes.
§63.13	Addresses	Addresses where reports, notifications, and requests are sent	Yes.
§63.14	Incorporations by Reference	Test methods incorporated by reference	Yes.
§63.15	Availability of Information	Public and confidential information	Yes