217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE

PERMITTEE

General Dynamics Ordinance & Tactical Systems Inc.
Attn: John Wells
6658 Route 148
Marion, Illinois 62959

Application No.: 95120119 I.D. No.: 199862AAB
Applicant's Designation: Date Received: June 4, 2008
Subject: Small Arms Ammunition
Date Issued: Expiration Date:
Location: 6658 Route 148 (I-Area), 11582 Skyline Drive (Test Range), and 8788 Wolf Creek Road (BF-Area), Marion, Williamson County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

One (1) 200 gallon Batch Propellants Mixer controlled by dust collector and condenser (BF-Area);
One (1) 50 gallon Batch Propellants and Inhibitors Mixer controlled by dust collector (BF-Area);
One (1) 5 gallon Pyrotechnic Mixer (I-Area);
One (1) 2.5 gallon Pyrotechnic Mixer (I-Area);
One (1) 12.554 mmBtu/hr Natural Gas-Fired Boiler (I-Area);
Two (2) Thermal Treatment Units (TTU#1 and TTU#2) controlled by cyclone scrubber system (Test Range);
One (1) 500 gallon gasoline storage tank (Test Range);
One (1) Paint Booth (BF-Area); and
Paint operations (I-Area);

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:

i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements 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.

ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission

Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM and the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD.

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 500 gallons 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 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 hour period.

c. Thermal Treatment Units TTU#1 and TTU#2 are subject to 35 Ill. Adm. Code 212.184 (Explosive Waste Incinerators). Pursuant to 35 Ill. Adm. Code 212.184(b), no person shall cause or allow the emission of particulate matter into the atmosphere from any such existing small explosive waste incinerator to exceed 7140 mg/kg (50.0 gr/lb) of combined waste and auxiliary fuel burned.

d. 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.

e. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).

4. 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.

5a. Pursuant to 35 Ill. Adm. Code 215.122(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 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 215.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 215.121(b)(2).

b. Pursuant to 35 Ill. Adm. Code 215.301, 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 source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K (Use of Organic Material) shall apply only to photochemically reactive material.

6. Pursuant to 35 Ill. Adm. Code 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hour) to exceed 200 ppm, corrected to 50 percent excess air.

7a. This permit is issued based on Thermal Treatment Units TTU#1 and TTU#2 not being subject to the New Source Performance Standards (NSPS) for Commercial and Industrial Solid Waste Incineration Units, 40 CFR 60 Subpart CCCC because the incineration units are not new incineration units as defined in 40 CFR 60.2015. Pursuant to 40 CFR 60.2020(g), 40 CFR 60 Subpart CCCC exempts hazardous waste combustion units for which you are required to get a permit under section 3005 of the Solid Waste Disposal Act.

b. This permit is issued based on Thermal Treatment Units TTU#1 and TTU#2 not being subject to the Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units, 40 CFR 60 Subpart DDDD. Pursuant to 40 CFR 60.2555(g), 40 CFR 60 Subpart DDDD

exempts hazardous waste combustion units for which you are required to get a permit under section 3005 of the Solid Waste Disposal Act.

8a. This permit is issued based on Thermal Treatment Units TTU#1 and TTU#2 not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Hazardous Waste Combustors, 40 CFR 63 Subpart EEE because Thermal Treatment Units TTU#1 and TTU#2 do not meet the definitions of hazardous waste combustor and hazardous waste incinerator in 40 CFR 63.1201 and the definition of incinerator in 40 CFR 240.10. In particular, Thermal Treatment Units TTU#1 and TTU#2 do not use controlled flame combustion.

b. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM. This is a result of the federally enforceable production and operating limitations, which have been established in this permit to restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

c. This permit is issued based on the boilers air make up heater at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 Subpart DDDDD because this source is not or is part of, a major source of HAP as defined in 40 CFR 63.2.

d. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH. Pursuant to 40 CFR 63.11169(d)(2), 40 CFR 63 Subpart HHHHHH does not apply to Surface coating or paint stripping of military munitions, as defined in 40 CFR 63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

e. This permit is issued based on the boilers at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 Subpart JJJJJJ. Pursuant to 40 CFR 63.11195(e), a gas-fired boiler as defined in 40 CFR 63 Subpart JJJJJJ are not subject to 40 CFR 63 Subpart JJJJJJ and to any requirements in 40 CFR 63 Subpart JJJJJJ.

9a. 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/hr (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.

b. Pursuant to 35 Ill. Adm. Code 212.184(a), 35 Ill. Adm. Code 212.181 (Limitations for Incinerators) shall not apply to certain existing small explosive waste incinerators if all the following conditions are met:

i. The incinerator burns explosives or explosive contaminated waste exclusively;

ii. The incinerator burns 227 kg/hr (500 lbs/hr) or less of waste;

iii. All incinerators on the same site operate a total of six (6) hours or less in any day; and

iv. The incinerator was in existence prior to December 6, 1976 and is located in Williamson County in Section 3, Township 9 South, Range 2 East of the Third Principal Meridian.

c. Pursuant to 35 Ill. Adm. Code 212.681, 35 Ill. Adm. Code 212.321 and 212.322 shall not apply to the following industries, which shall be subject to 35 Ill. Adm. Code 212 Subpart K:

i. Grinding; and

ii. Sandblasting or shotblasting.

10a. Pursuant to 35 Ill. Adm. Code 215.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 215.122 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).

b. This permit is issued based on the 500 Gallon Gasoline Storage Tank not being subject to 35 Ill. Adm. Code 215.583 (Gasoline Dispensing Facilities - Storage Tank Filling Operations). Pursuant to 35 Ill. Adm. Code 215.583(b)(4), the requirements of 35 Ill. Adm. Code 215.583(a)(2) shall not apply to transfers of gasoline to a stationary storage tank at a gasoline dispensing facility if the tank is not located in any of the following counties: Boone, Cook, DuPage, Kane, Lake, Madison, McHenry, Peoria, Rock Island, St. Clair, Tazewell, Will or Winnebago.

c. Pursuant to 35 Ill. Adm. Code 215.206(a), the limitations of 35 Ill. Adm. Code 215 Subpart F (Coating Operations) shall not apply to:

i. Coating plants in which emissions of volatile organic material as limited by the operating permit will not exceed 22.7 Mg/year (25 T/year), in the absence of air pollution control equipment; or

ii. Coating plants in which the total coating usage does not exceed 9,463 l/yr (2,500 gal/yr); or

11. Pursuant to 35 Ill. Adm. Code 216.142(b), 35 Ill. Adm. Code 216.141 (Incinerators) shall not apply to existing small explosive waste incinerators which meet the conditions of 35 Ill. Adm. Code 212.184(a).

12a. 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;

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.

13a. In the event that the operation of this emission unit 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 Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the dust collection and condenser systems associated with the mixers and the cyclone scrubber system associated with Thermal Treatment Units TTU#1 and TTU#2 such that the dust collection and condenser systems and the cyclone scrubber system are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.

c. The boilers and the air makeup unit shall only be operated with natural gas as the fuel. The use of any other fuel in the boilers or the air makeup unit 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.

14a. Emissions from and operation of the boilers and air makeup unit shall not exceed the following limits:

Pollutant	Emission Factor (lbs/mmscf)	Emissions (lb/hr)	Emissions (Tons/Yr)
Carbon Monoxide (CO)	84.0	2.23	9.75
Nitrogen Oxides (NO_x)	100.0	2.65	11.61
Particulate Matter (PM)	7.6	0.20	0.88
Sulfur Dioxide (SO_2)	0.6	0.02	0.10
Volatile Organic Material (VOM)	5.5	0.15	0.64

These limits are based on the combined maximum heat input for the boilers and air makeup unit (26.5 mmBtu/hr), 8760 hours per year of operation for each unit and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

b. Emissions from and operation of Thermal Treatment Units TTU#1 and TTU#2 shall not exceed the following limits:

Pollutant	Emissions (lb/hr, each)	Emissions (Tons/Yr, both)
Carbon Monoxide (CO)	10.43	10.70
Nitrogen Oxides (NO_x)	1.09	1.18
Particulate Matter (PM)	0.40	0.40
Sulfur Dioxide (SO_2)	0.05	0.04

These limits are based on the maximum charge of each unit (500 lbs/hour), 1,095 hours per year of operation for each incinerator, and stack test emission data.

c. Emissions from and operation of paint operations shall not exceed the following limits:

i. Coating Usage: 243 gallons/month, 2,430 gallons/year.

ii. VOM Emissions from the paint operations:

Pollutant	VOM Emissions (Tons/Mo)	VOM Emissions (Tons/Yr)
Volatile Organic Material (VOM)	0.29	2.89
MIBK (HAP)	0.05	0.48
Xylene (HAP)	0.13	1.23
Toluene (HAP)	0.08	0.78
Ethyl Benzene (HAP)	0.02	0.14

These limits are based on the VOM and HAP content of materials, the maximum coating usage, and mass balance. The VOM and HAP emissions shall be determined from the following equation:

$$E = \Sigma(P_i \times C_i) + \Sigma\ (S_j \times C_j)$$

Where:

E = VOM or HAP emissions (ton);

P_i = paint usage (ton);

C_i = VOM or HAP content of the paint (fraction);

S_j = clean-up solvent usage (ton);

C_j = VOM or HAP content of the solvent (fraction);

d. Emissions from and operation of the mixers shall not exceed the following limits:

i. VOM and HAP emissions:

Emission Unit	Solvent Usage (lb/hr)	Operating Hours (Hours/Yr)	VOM Emissions (lb/hr)	VOM Emissions (Ton/Yr)	Single HAP (lb/hr)	Single HAP (Ton/Yr)
200 Gallon Mixer	62.00[1]	240	22.32	2.68	22.32	2.68
50 Gallon Mixer	13.30[1]	210	2.66	0.28	2.66	0.28
5 Gallon Mixer	5.53[2]	1,193	--	--	5.53	3.30[2]
2.5 Gallon Mixer	8.30[1]	1,205	8.30	5.00	8.30	5.00[1]
			Totals:	7.96		7.96[1]

[1] Hexane
[2] Methylene Chloride

These limits are based on the maximum solvent usage, the maximum operating hours of each mixer, 80% capture efficiencies for the 200 gallon and 50 gallon mixers, and 80% control efficiency for the condenser associated with the 200 gallon mixer.

ii. PM emissions:

Emission Unit	Production Rate (lb/hr)	Operating Hours (Hours/Yr)	PM Emissions (lb/hr)	PM Emissions (Tons/Yr)
5 Gallon Mixer	30	1,193	0.55	0.33
2.5 Gallon Mixer	12	1,205	0.55	0.33
			Total:	0.66

These limits are based on the maximum production rates of the mixers, the maximum hours of operation for the mixers, and the allowable emission rates from 35 Ill. Adm. Code 212.321.

iii. This permit is issued based on negligible emissions of particulate matter (PM) from 200 gallon mixer and the 50 gallon mixer. For this purpose emissions from each emission unit shall

not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.

e. VOM emission from 500 gallons gasoline storage tank shall not exceed 0.1 ton/mo and 0.57 ton/yr. The VOM emission shall be calculated using equations given by standard emission formulas (Organic liquids storage tank operations: Section 7.1, AP-42 5th edition, Volume I, November 2006 and utilized in the TANKS Program Version 4.09D).

f. 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 months total).

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 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.

18. 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.

19. 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.

20a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. Records addressing use of good operating practices for the dust collection and condenser systems associated with the mixers and

the cyclone scrubber system associated with Thermal Treatment Units TTU#1 and TTU#2:

A. Records for periodic inspection of the dust collection and condenser systems associated with the mixers and the cyclone scrubber system associated with Thermal Treatment Units TTU#1 and TTU#2 with date, individual performing the inspection, and nature of inspection; and

B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

ii. Natural gas usage (mmscf/month and mmscf/year);

iii. Paint operation coating usage (gallons/month and gallons/year);

iv. The names and amounts of clean-up solvents associated with the paint operation used (gallons/month and gallons/year);

v. VOM and HAP content of paint and solvent used (% by weight);

vi. Density of of each paint and solvent used (lb/gallons);

vii. VOM and HAP content of raw material for each mixing tank and (percent by weight);

viii. Raw material throughput and production rate for each mixing tank (lb/month and tons/year);

ix. Amount of explosive waste burned in each Thermal Treatment Unit (lbs/hr and tons/year);

x. Hours of operation of each Thermal Treatment Unit (hrs/day and hrs/year); and

xi. Monthly and annual CO, NO_x, PM, SO_2, VOM, and HAPs 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 records 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.

21. 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.

22a. 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
2009 Mall Street
Collinsville, Illinois 62234

It should be noted that the natural gas-fired boilers and air make-up units with firing rate less than 10 mmBtu/hr, emergency generators with power rating less than 1,500 hp/hr, welding and magnaflux bay, lathe, presses and metal grinding operations are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(d), (i), (y), and (aa), respectively.

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

Edwin C. Bakowski, P.E. Date Signed: _____
Manager, Permit Section
Division of Air Pollution Control

ECB:VJB:

cc: Illinois EPA, FOS Region 3
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emission for the small arms ammunition 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 (i.e., 10 tons/year for any single HAP and 25 tons/year for any combination of such HAPs) at which this facility would be considered a major source for purposes of the Clean Air Act Permit Program.

	E M I S S I O N S (Tons/Year)						
Emission Unit	CO	NO_x	PM	SO_2	VOM	Single HAP	Total HAPs
Natural Gas Combustion (I-Area)	9.75	11.61	0.88	0.10	0.64		
Thermal Treatment Units TTU#1 and TTU#2	10.70	1.18	0.40	0.04			
Paint operations					2.89	1.23[1]	2.63
200 gallon mixer			0.44		2.68	2.68[2]	2.68
50 gallon mixer			0.44		0.28	0.28[2]	0.28
5 gallon mixer			0.33			3.30[3]	3.30
2.5 gallon mixer			0.33		5.00	5.00[2]	5.00
500-gallon gasoline storage tank					0.57		
Totals	20.45	12.79	2.82	0.14	12.06	7.96[2]	13.89

[1] Xylene
[2] Hexane
[3] Methylene Chloride

Attachment B - Table 3 to 40 CFR 63 Subpart CCCCCC — Applicability of General Provisions

Citation	Subject	Brief description	Applies to subpart CCCCCC
§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 CCCCCC 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.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.6(b)(5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes.
§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.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§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.
§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.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§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.
§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.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§63.6(j)	Presidential Compliance Exemption	President may exempt any source from requirement to comply with 40 CFR 63 Subpart CCCCCC	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.
§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.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§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.
§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.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§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.
§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.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§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.
§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.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§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.
§63.10(b)(2)(vi)-(xi)	CMS Records	Malfunctions, inoperative, out-of-control periods	No.

Citation	Subject	Brief description	Applies to subpart CCCCCC
§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.

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, 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.
§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