

1.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit-specific conditions, is each coating line described in Conditions 1.1.1 and 1.1.2.
- b. The affected coating lines are subject to 35 IAC 215 Subpart K, Use of Organic Material, which provides that:

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

- c. The affected coating lines are subject to 35 IAC 212.321(b) (1), which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

1.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected coating lines not being subject to 35 IAC Part 215, Subpart F: Coating Operations, because the affected coating lines apply coatings to plastic parts.
- b.
 - i. This permit is issued based on the affected coating lines not being subject to 40 CFR Part 63, Subpart PPPP: Surface Coating of Plastic Parts and Products, because the affected coating lines are not located at a major source of hazardous air pollutants.
 - ii. If the source increases operations such that it becomes a major source of hazardous air pollutants, the source shall comply with the applicable provisions of 40 CFR Part 63, Subpart PPPP: Surface Coating of Plastic Parts and Products. Specifically, the source shall apply NESHAP compliant coatings to the plastic parts. As an alternative, NESHAP compliant add-on control may be utilized, which will require a construction permit for the proposed control device.

- c. The source has addressed the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The limits established by this permit for the affected coating lines and other units at the source (See Condition 3) are intended to ensure that the construction addressed in this construction permit does not constitute a new major source pursuant to this rule.

1.1.5 Operational Production Limits and Work Practices

- a.
 - i. The emissions of PM from the affected coating lines shall be vented to filters at all times when the application equipment is in operation.
 - ii. The Permittee shall follow good operating practices and procedures for the spray application equipment filters including periodic inspections, routine maintenance, and prompt repair of defects.
 - iii. The Permittee shall maintain an adequate supply of replacement filters on the premises of the source.
- b. The usage of the following substances in the raw material used on the affected coating lines shall not exceed the following limits:

<u>Substance</u>	<u>Usage</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
VOM	40.0	240.0
Individual HAP	1.6	9.5
Combination of all HAPs	4.0	24.0

1.1.6 Emission Limitations

- a. Emissions from the automobile door handle coating facility shall not exceed the following limits. Compliance with the annual limit shall be determined from a running total of 12 months of data:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
VOM	40.0	240.0
Individual HAP	1.6	9.5
Combination of all HAPs	4.0	24.0

- b. This permit is issued based upon negligible emissions of volatile organic material from the manufacturing of automobile door handles, i.e., injection molding of automobile door handles. For this purpose, emissions from all such sources shall not exceed a nominal emission rate of 1.0 tons/year.

1.1.7 Testing Requirements

- a. The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].
- b. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating lines shall be determined as follows:
 - i. The VOM content of representative coatings "as applied" on the affected coating lines shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105.
 - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 1.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.

1.1.8 Monitoring Requirements

None

1.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected coating lines:

- a. Usage of each raw material containing VOM, OM or HAP on the affected coating lines (gallons/month and gallons/year);
- b. VOM, individual HAP and total HAP content of such each raw material (lb/gallon), with supporting documentation;
- c. VOM emissions from the affected coating lines (tons/month and tons/year);
- d. Individual and total HAP emissions from the affected coating lines (tons/month and tons/year);
- e.
 - i. A file containing calculations for the maximum emissions of VOM that could be emitted in any continuous one hour period for each emission unit subject to Condition 1.1.3(b) (35 IAC 215.301);
 - ii. If the Permittee chooses to rely on a coating, cleanup solvent or other organic material containing raw material used on the affected coating line not having organic material emissions that are photochemically reactive pursuant to 35 IAC 211.4690 so as to meet the exemption provided in 35 IAC 215.301 (see also Condition 1.1.3(b)), then the Permittee shall maintain a file containing information on the composition of the organic material in such raw material, showing that it meets the exemption, with supporting documentation and justification for the exemption.

1.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA of deviations of the affected coating lines with the permit requirements. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

1.1.11 Compliance Procedures

- a. Compliance with Condition 1.1.3(b) is addressed by the recordkeeping requirements of Condition 1.1.9.
 - b. Compliance with Conditions 1.1.6 is addressed by the recordkeeping requirements of Condition 1.1.9 and material balance calculations.
 - c. Compliance with Condition 1.1.3(c) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected coating lines.
- 2a. Operation of the automobile door handle coating facility identified in this permit is allowed to operate until December 31, 2005 under this construction permit.
- b. The Permittee must submit its complete CAAPP application for the source within 12 months after commencing operation of the automobile door handle coating facility, pursuant to Section 39.5(5)(x) of the Environmental Protection Act.
3. Construction of each coating line shall be commenced no later than December 31, 2006. Construction commencing after this date is not authorized under this permit.
- 4a. This permit does not authorize construction of the following sun roof and door assembly operations already at the source, which were exempt from state permit requirements when they were constructed:

<u>Operation</u>	<u>Exemption</u>
Building Heat	35 IAC 201.146(c)
Primer and Adhesive Application on Glass	35 IAC 201.146(g)
Electric Cure Oven	35 IAC 201.146(g)
Degreasing	35 IAC 201.146(v)
Welding	35 IAC 201.146(y)
PVC Injection Molding	35 IAC 201.146(ii)
Polyurethane Foam Application on Glass	35 IAC 201.146(cc)

- b. Emissions from the automobile sun roof and door assembly operations shall not exceed. Compliance with the annual limits shall be determined from a running total of 12 months of data:

<u>Pollutant</u>	<u>(Ton/Year)</u>
VOM	3.0
Individual HAP	0.4
Combination of all HAPs	0.9

- c. The Permittee shall maintain records of the following items for the automobile sun roof and door assembly operations:
 - i. Usage of each raw material containing VOM, OM or HAP associated with the sun roof and door assembly operations (gallons/month and gallons/year);
 - ii. VOM, individual HAP and total HAP content of such each raw material (lb/gallon), with supporting documentation;
 - iii. VOM emissions from the sun roof and door assembly operations (tons/month and tons/year);
 - iv. Individual and total HAP emissions from the affected sun roof and door assembly operations (tons/month and tons/year);

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

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