

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE

PERMITTEE

Custom Aluminum Products, Inc.
Attn: Steve Dillett, President
414 West Division
South Elgin, Illinois 60177

Application No.: 96030089 I.D. No.: 089080AAS
Applicant's Designation: Date Received: March 30, 2009
Subject: Extruder and Finish Aluminum Products
Date Issued: Expiration Date:
Location: 414 West Division, South Elgin, Kane County, 60177

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

Outer Painting Line consisting of Five (5) Paint Booths;
Inner Painting Line consisting of Three (3) Paint Booths;
Wood Coating;
One (1) 6.19 mmBtu/hour Natural Gas-Fired Log Oven;
One (1) 3.5 mmBtu/hour Natural Gas-Fired Age Oven;
One (1) 7.51 mmBtu/hour Natural Gas-Fired Curing Oven;
Two (2) 5.4 mmBtu/hour Natural Gas-Fired Ovens (Ferall Aluminum Extrusion Line); and
One (1) a 2.5 mmBtu/hour Natural Gas-Fired Oven (Sutton Aluminum Extrusion Line)

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., 100 tons/year for Volatile Organic Material (VOM) and 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 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 Emission Reduction Market System (ERMS) provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for the purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205, which are described in Attachment B.

- 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 painting lines at this source are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subparts A and HHHHHH. The Illinois EPA is administrating the NESHAP on behalf of USEPA under a delegation agreement. Pursuant to 40 CFR 63.11170(a)(3), you are subject to 40 CFR 63 Subpart HHHHHH if you operate an area source of HAP as defined in 40 CFR 63.11170(b), including sources that are part of a tribal, local, State, or Federal facility and you perform spray application of coatings that contain the target HAP, as defined in 40 CFR 63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in 40 CFR 63.11180.
- b. Pursuant to 40 CFR 63.11171(b), the affected source is the collection of all of the items listed in 40 CFR 63.11171(b)(1) through (6). Not all affected sources will have all of the items listed in 40 CFR 63.11171(b)(1) through (6).
 - i. Mixing rooms and equipment;
 - ii. Spray booths, ventilated prep stations, curing ovens, and associated equipment;
 - iii. Spray guns and associated equipment;
 - iv. Spray gun cleaning equipment;
 - v. Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and
 - vi. Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.
 - c. Pursuant to 40 CFR 63.11171(e), an affected source is an existing source if it is not a new source (i.e., not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007) or a reconstructed source.
 - d. Pursuant to 40 CFR 63.11172(b), for an existing affected source, the compliance date is January 10, 2011.
- 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. 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.
- d. 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).
- e. 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.
- 4a. Pursuant to 35 Ill. Adm. Code 218.204, except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Miscellaneous Metal Parts and Products Coating. Except as otherwise provided in 35 Ill. Adm. Code 218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows: On and after May 1, 2012, the limitations in 35 Ill. Adm. Code 218.204(q) shall apply to the Miscellaneous Metal Parts and Products Coating category of coating.

b. Pursuant to 35 Ill. Adm. Code 218.204(q)(1), on and after May 1, 2012, the owner or operator of a miscellaneous metal or plastic parts coating line shall comply with the limitations in 35 Ill. Adm. Code 218.204(q). The limitations in 35 Ill. Adm. Code 218.204(q) shall not apply to aerosol coating products, powder coatings, or primer sealants and ejection cartridge sealants used in ammunition manufacturing. Primer sealants and ejection cartridge sealants shall instead be regulated under 35 Ill. Adm. Code 218 Subpart TT. For purposes of 35 Ill. Adm. Code 218.204(q)(1), "corrosion resistant basecoat" means a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance. The limitations in 35 Ill. Adm. Code 218.204(q)(1) shall not apply to stencil coats, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating. The limitations in 35 Ill. Adm. Code 218.219, however, shall apply to these coatings unless specifically excluded in 35 Ill. Adm. Code 218.219.

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
i.	General one component coating		
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Baked	0.28 (2.3)	0.40 (3.35)
ii.	General multi-component coating		
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Baked	0.28 (2.3)	0.40 (3.35)
iii.	Extreme performance coating		
	A. Air dried	0.42 (3.5)	0.80 (6.67)
	B. Baked	0.36 (3.0)	0.61 (5.06)
iv.	Repair coats and touch-up coatings		
	A. Air dried	0.42	

		kg/l (lb/gal) coatings (3.5)	kg/l (lb/gal) solids
	B. Baked	0.36 (3.01)	
v.	All other coatings		
	A. Air dried	0.40 (3.3)	0.73 (5.98)
	B. Baked	0.34 (2.8) 0.40	0.54 (4.52) 0.73
c.	<p>Pursuant to 35 Ill. Adm. Code 218.205(k), no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.205 shall operate the subject coating line unless the owner or operator has demonstrated compliance with 35 Ill. Adm. Code 218.205(a), (b), (c), (d), (e), (f), (g), (h), (i), (j), or (k) (depending upon the category of coating) through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(d): On and after May 1, 2012, no owner or operator of a miscellaneous metal parts and products coating line, plastic parts or products coating line, pleasure craft surface coating line, or motor vehicle materials coating line subject to the limitations of Section 218.204(q) of this Subpart shall apply coatings on the subject coating line unless the requirements of 35 Ill. Adm. Code 218.205(k)(1) or (k)(2) are met:</p>		
	i.	<p>For each coating line that applies multiple coatings, all of which are subject to the same numerical emission limitation within 35 Ill. Adm. Code 218.204(q), during the same day (e.g., all coatings used on the line are subject to 0.42 kg/l (3.5 lbs/gal)), the daily-weighted average VOM content shall not exceed the coating VOM content limit corresponding to the category of coating used; or</p>	
	ii.	<p>For each coating line that applies coatings subject to more than one numerical emission limitation in 35 Ill. Adm. Code 218.204(q), during the same day, the owner or operator shall have a site specific proposal approved by the Illinois EPA and approved by USEPA as a SIP revision. To receive approval, the requirements of USEPA's Emissions Trading Policy Statement (and related policy) must be satisfied.</p>	

- d. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) 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 shall only apply to photochemically reactive material.
- 5a. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production, 40 CFR 63 Subpart RRR because the source is not a secondary aluminum production facility as defined in 40 CFR 63.1503. The source does not meet the definition of secondary aluminum production facility because it does not perform scrap shredding, scrap drying/delacquering/decoating, thermal chip drying, furnace operations (i.e., melting, holding, sweating, refining, fluxing, or alloying), recovery of aluminum from dross, in-line fluxing, or dross cooling.
- b. This permit is issued based on the source not being subject to the National Emission Standard 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 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 source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63 Subpart TTTTTT, because the source does not perform furnace melting operations as defined in 40 CFR 63.11472.
- d. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries, 40 CFR 63 Subpart ZZZZZZ, because this source does not use material containing other nonferrous foundry HAP, as defined in 40 CFR 63.11556.
- 6. 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.
- 7a. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(A), notwithstanding 35 Ill. Adm. Code 218.187(a)(1), the following cleaning operations shall be

exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g);

- i. Cleaning operations subject to the limitations in 35 Ill. Adm. Code 218.182, 218.183, or 218.184;
 - ii. Janitorial cleaning;
 - iii. Stripping of cured coatings, inks, or adhesives;
- b. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(B)(x), notwithstanding 35 Ill. Adm. Code 218.187(a)(1) cleaning operations within the miscellaneous metal parts coating source category shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (f), and (g).
- c. Pursuant to 35 Ill. Adm. Code 218.208(d), prior to May 1, 2012, the limitations of 35 Ill. Adm. Code 218 Subpart F shall not apply to touch-up and repair coatings used by a coating source described by 35 Ill. Adm. Code 218.204(j), (n), and (o), provided that the source-wide volume of the coatings used does not exceed 0.95 l (1 quart) per eight-hour period or exceed 209 l/yr (55 gal/yr) for any rolling 12 month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with 35 Ill. Adm. Code 218.208(e).
- d. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- 8a. Pursuant to 40 CFR 63.11173(e), each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in 40 CFR 63.11173 (e)(1) through (e)(5).
- i. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 40 CFR 63.11173(f). The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11173(f). The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.
 - ii. All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of 40 CFR 63.11173(e)(2)(i) and either 40 CFR 63.11173(e)(2)(ii), (e)(2)(iii), or (e)(2)(iv).

- A. All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992". The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
 - B. Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
 - C. Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
 - D. Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.
- iii. All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for

which written approval has been obtained from the Illinois EPA or USEPA. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002". The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

- iv. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.
- v. As provided in 40 CFR 63.6(g), the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in 40 CFR 63.11173 after you have requested approval to do so according to 40 CFR 63.6(g)(2).
- b. Pursuant to 40 CFR 63.11173(f), each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, are trained in the proper application of surface coatings as required by 40 CFR 63.11173(e)(1). The training program must include, at a minimum, the items listed in paragraphs 40 CFR 63.11173(f)(1) through (f)(3).
 - i. A list of all current personnel by name and job description who are required to be trained;
 - ii. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in 40 CFR 63.11173(f)(2)(i) through (2)(iv).
 - A. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper

fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

- B. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
 - C. Routine spray booth and filter maintenance, including filter selection and installation.
 - D. Environmental compliance with the requirements of 40 CFR 63 Subpart HHHHHH.
- iii. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in 40 CFR 63.11173(f)(2) are not required to provide the initial training required by that paragraph to these painters.
- c. Pursuant to 40 CFR 63.11173(g), as required by 40 CFR 63.11173(e)(1), all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by the dates specified in 40 CFR 63.11173(g)(1) and (2). Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.
- i. If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in 40 CFR 63.11173(f)(2) satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
 - ii. Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of 40 CFR 63.11173 and be re-certified every five years.
- d. Pursuant to 40 CFR 63.11174(a), Table 1 of 40 CFR 63 Subpart HHHHHH (see also Attachment C) shows which parts of the General Provisions in 40 CFR 63 Subpart A apply to you.

- 9a. Pursuant to 35 Ill. Adm. Code 211.1670, "daily-weighted average VOM content" means the average VOM content of two or more coatings as applied on a coating line during any day, taking into account the fraction of total coating volume that each coating represents, as calculated with the following equation:

$$VOM_w = \left[\sum_{i=1}^n V_i C_i \right] / V_T$$

where:

VOM_w = The average VOM content of two or more coatings as applied each day on a coating line in units of kg VOM/l (lbs VOM/gallon) of coating (minus water and any compounds which are specifically exempted from the definition of VOM),

n = The number of different coatings as applied each day on a coating line,

V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of 1 (gallon).

C_i = The VOM content of each coating as applied each day on a coating line in units of kg VOM/l (lbs VOM/gallon) of coating (minus water and any compounds which are specifically exempted from the definition of VOM), and

V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of 1 (gallon). When powder coatings are part of the calculation of daily weighted average the actual density of each powder must be used to convert powder weights (pounds) to volume (gallons)

- b. Pursuant to 35 Ill. Adm. Code 218.219(b), except as provided in 35 Ill. Adm. Code 218.219(c), every owner or operator of a coating line described in 35 Ill. Adm. Code 218.204(q) shall:
- i. Store all VOM-containing coatings, thinners, coating-related waste materials, cleaning materials, and used shop towels in closed containers;
 - ii. Ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials;
 - iii. Minimize spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials;

- iv. Convey VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes;
 - v. Minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers; and
 - vi. Apply all coatings using one or more of the following application methods:
 - A. Electrostatic spray;
 - B. High volume low pressure (HVLP) spray;
 - C. Flow coating. For the purposes of 35 Ill. Adm. Code 218.219(b)(6)(C), flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
 - D. Roll coating;
 - E. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 218.219(b)(6)(E), electrodeposition means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
 - F. Airless spray;
 - G. Air-assisted airless spray; or
 - H. Another coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.
- 10a. 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 paint booth filters such that the paint booth filters are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
 - c. The Log Oven, Age Oven, Curing Oven, Ferall Ovens, and Sutton Oven shall only be operated with natural gas as the fuel. The use of any

other fuel in any of the ovens 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.

- 11a. Emissions from and operation of the paint booths shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>Tons/Month</u>	<u>Tons/Year</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
4.56	45.55	4.56	45.55

These limits are based on maximum coating materials, thinner and solvent usage and emissions are determined by materials balance.

- b. Emissions and operation of the Log Oven, Age Oven, Curing Oven, Ferall Ovens, and Sutton Oven (combined) shall not exceed the following limits:

- i. Natural Gas Usage:

<u>(mmscf/Month)</u>	<u>(mmscf/Year)</u>
20	200

- ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	Emission Factor <u>(lbs/mmscf)</u>	Emissions	
		<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
CO	84.0	0.84	8.40
NO _x	100.0	1.00	10.00
PM	7.6	0.08	0.76
SO ₂	0.6	0.01	0.06
VOM	5.5	0.06	0.55

These limits are based on maximum fuel usage and standard emissions factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- c. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP Permit from the Illinois EPA and the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm.
- d. Compliance with the VOM and HAP emission limits from the paint booths shall be based on the formulas listed below:

VOM (ton) = Coating, thinner and solvent usage (gal) x Density (lb/gal) x VOM Content (% by wt.)/2,000

HAP (ton) = Coating, thinner and solvent usage (gal) x Density (lb/gal) x HAP content (% by wt.)/2000

- e. 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).
- 12a. 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 Conditions 13 and 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
13. 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.

14. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
15. 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.
- 16a. Pursuant to 40 CFR 63.11177, if you are the owner or operator of a surface coating operation, you must keep the records specified in 40 CFR 63.11177(a) through (d) and (g). If you are the owner or operator of a paint stripping operation, you must keep the records specified in 40 CFR 63.11177(e) through (g), as applicable.
 - i. Certification that each painter has completed the training specified in 40 CFR 63.11173(f) with the date the initial training and the most recent refresher training was completed.
 - ii. Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(3)(i).
 - iii. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89

- cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Illinois EPA or USEPA to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in 40 CFR 63.11173(e)(4).
 - iv. Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.
 - v. Records of any deviation from the requirements in 40 CFR 63.11173, 40 CFR 63.11174, 40 CFR 63.11175, or 40 CFR 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
 - vi. Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.
- b. Pursuant to 40 CFR 63.11178(a), if you are the owner or operator of an affected source, you must maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.
17. 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.
- 18a. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating as applied on each coating line;
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;

- iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line, and certified product data sheets for each coating.
 - b. Pursuant to 35 Ill. Adm. Code 218.211(d)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.205 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating as applied on each coating line.
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
 - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line.
 - iv. The daily weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104.
 - c. Pursuant to 35 Ill. Adm. Code 218.211(h)(3), on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.219 shall comply with the following: Maintain at the source all records required by 35 Ill. Adm. Code 218.211(h) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- 19a. 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 paint booth filters:
 - A. Records for periodic inspection of the paint booth filters 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. Usage of each coating and other materials containing VOM and HAP (i.e., thinner and solvent), (gallons/month and gallons/year);
 - ii. The VOM and HAP content of each coating and other materials containing VOM and HAP (% by weight);
 - iii. The density of each coating and other materials containing VOM and HAP (lbs/gallon);
 - iv. Natural Gas Usage (ft³/month and ft³/year); and
 - v. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM, each individual HAP and total HAPs 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.
- 20a. Pursuant to 40 CFR 63.11176(a), if you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by 40 CFR 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in 40 CFR 63.11173(a) through (d) or 40 CFR 63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with 40 CFR 63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in 40 CFR 63.11176(a)(1) through (2).
- i. Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - ii. The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart HHHHHH or an explanation of any

noncompliance and a description of corrective actions being taken to achieve compliance.

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. Pursuant to 35 Ill. Adm. Code 218.211(c), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following:
 - i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from 35 Ill. Adm. Code 218.205, 35 Ill. Adm. Code 218.207, 35 Ill. Adm. Code 218.215, or 35 Ill. Adm. Code 218.216 to 35 Ill. Adm. Code 218.204; the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 218.204 on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date. The certification shall include:
 - A. The name and identification number of each coating as applied on each coating line;
 - B. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - C. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line.
 - ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
 - A. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - B. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204, 35 Ill. Adm.

Code 218.205 to 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204, 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d), or (e), as applicable.

- b. Pursuant to 35 Ill. Adm. Code 218.211(d), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 and complying by means of 35 Ill. Adm. Code 218.205 shall comply with the following:
 - i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance for an existing subject coating line from 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.205; the owner or operator of the subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 218.205 on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date. The certification shall include:
 - A. The name and identification number of each coating line which will comply by means of 35 Ill. Adm. Code 218.205.
 - B. The name and identification number of each coating as applied on each coating line.
 - C. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
 - D. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line.
 - E. The instrument or method by which the owner or operator will accurately measure or calculate the volume of each coating as applied each day on each coating line.
 - F. The method by which the owner or operator will create and maintain records each day as required in 35 Ill. Adm. Code 218.211(d)(2).
 - G. An example of the format in which the records required in 35 Ill. Adm. Code 218.211(d)(2) will be kept.

- ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
 - A. Any record showing violation of 35 Ill. Adm. Code 218.205 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - B. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(c)(1) or (e)(1), as applicable. Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(c) or (e), as applicable.
- 23a. 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, a copy of the relevant records, and a description of the exceedances or deviation and efforts to reduce 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 and Enforcement 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 fuel burning emission units for direct systems used for comfort heating purposes and indirect heating systems with a design heat input of less than 2930 KW (10 mmBtu/hour) are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(d).

It should also be noted that storage tanks of organic liquids with a capacity of less than 37,850 liter (10,000 gallons), provided the storage tank is not

Page 22

used to store any material listed as a hazardous air pollutant pursuant to Section 112(b) of the Clean Air Act are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(n)

If you have any questions on this permit, please contact David Hulskotter at 217/785-1705.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:DWH:

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the Extruder and Finish Aluminum Products manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAPs) 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)					Single	Total
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Paint Booths					45.55		
Natural Gas-Fired Ovens	<u>8.40</u>	<u>10.0</u>	<u>0.76</u>	<u>0.06</u>	<u>0.55</u>		
Totals	<u>8.40</u>	<u>10.0</u>	<u>0.76</u>	<u>0.06</u>	<u>46.10</u>	<u>9.0</u>	<u>22.5</u>

Attachment B - Emissions Reduction Market System (ERMS)

1. Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

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

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

2. Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 Ill. Adm. Code Part 205.

3. Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 Ill. Adm. Code 205.150(c)(1) and 35 Ill. Adm. Code 205.720, and as further addressed by Condition 8 of this Attachment, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 5 of this Attachment.
 - i. VOM emissions from emission units that the Illinois EPA determines would qualify as insignificant activities under 35 Ill. Adm. Code 201 Subpart F if the source were a CAAPP source and for which a statement to this effect is contained in the FESOP for a participating or new participating source are exempt from the requirements of 35 Ill. Adm. Code Part 205, in accordance with 35 Ill. Adm. Code 205.220(b);
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit for sources permitted to operate during startup, malfunction or breakdown pursuant to 35 Ill. Adm. Code 201.262, in accordance with 35 Ill. Adm. Code 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 Ill. Adm. Code 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 Ill. Adm. Code 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 8(b) of this Attachment, if applicable, in accordance with 35 Ill. Adm. Code 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 Ill. Adm. Code 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 Ill. Adm. Code Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions of this permit.

4. Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 Ill. Adm. Code 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 Ill. Adm. Code 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 Ill. Adm. Code 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 Ill. Adm. Code 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

5. Emissions Excursion Compensation

Pursuant to 35 Ill. Adm. Code 205.720, if the source fails to hold ATUs in accordance with Condition 3 of this Attachment, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 Ill. Adm. Code 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6. Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 Ill. Adm. Code 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 Ill. Adm. Code 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 Ill. Adm. Code 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

7. Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 Ill. Adm. Code 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 Ill. Adm. Code 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 Ill. Adm. Code 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance

Schedule, as provided for in 35 Ill. Adm. Code 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 Ill. Adm. Code 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 Ill. Adm. Code 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

8. Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 135 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 15.2965 tons per season.

A. This determination includes the use of 1993 and 1997 as baseline seasons as allowed by 35 IAC 205.320(a).

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 Ill. Adm. Code 205.405, including units complying with MACT or using BAT, as identified in Condition 10 of this Attachment of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 3(a) of this Attachment becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

None

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 Ill. Adm. Code Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 Ill. Adm. Code 205.630;
 - ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 Ill. Adm. Code 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 Ill. Adm. Code 205.410.

9. Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 Ill. Adm. Code 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as recorded and as required by Condition 17(a) of this permit and Condition 6(a) of this Attachment; and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

10. Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 Ill. Adm. Code 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 Ill. Adm. Code 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the Clean Air Act;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 Ill. Adm. Code 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 Ill. Adm. Code 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 Ill. Adm. Code 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 Ill. Adm. Code 205.405(b) and (c)]:

None

Attachment C - Table 1 to Subpart HHHHHH of 40 CFR Part 63 – Applicability of General Provisions to Subpart HHHHHH of 40 CFR Part 63

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(a)(1)-(12)	General Applicability	Yes	
§63.1(b)(1)-(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in 40 CFR 63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in 40 CFR 63.11180.
§63.3(a)-(c)	Units and Abbreviations	Yes	
§63.4(a)(1)-(5)	Prohibited Activities	Yes	
§63.4(b)-(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	Yes	40 CFR 63.11172 specifies the compliance dates.
§63.6(c)(1)-(5)	Compliance Dates for Existing Sources	Yes	40 CFR 63.11172 specifies the compliance dates.
§63.6(e)(1)-(2)	Operation and Maintenance	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)-(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)-(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)-(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)-(d)	Notification Requirements	Yes	40 CFR 63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.9(h)	Notification of Compliance Status	No	40 CFR 63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	40 CFR 63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting-Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in 40 CFR 63.11177.
§63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in 40 CFR 63.11176.

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.10(d)(2)-(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in 40 CFR 63.11173(e)(2) and (3) are incorporated and included in 40 CFR 63.14.
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions—reduced reporting	Yes	
§63.16(b)-(c)	Performance Track Provisions—reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.

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