217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Nascote Industries
Attn: Jim Evilsizer, Environmental Manager
18310 Enterprise Avenue
Nashville, Illinois 62263

Application No.: 95070058 I.D. No.: 189801AAA
Applicant's Designation: Date Received: July 20, 1995
Operation of: Plastic Molding Plant
Date Issued: August 21, 2002 Expiration Date[2]: August 21, 2007
Source Location: 18310 Enterprise Avenue, Nashville, Washington County
Responsible Official: Jim Smith, General Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a plastic molding plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

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

DES:AB:psj

cc: Illinois EPA, FOS, Region 3
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Nascote Industries
18310 Enterprise Avenue
Nashville, Illinois 62263

I.D. No.: 189801AAA
Standard Industrial Classification: 3089, Plastic Products

1.2 Owner/Parent Company

Decom International
50 Casmir Court
MConcord, Canada, ONT L4K4J5

1.3 Operator

Nascote Industries
18310 Enterprise Avenue
Nashville, Illinois 62263

Jim Evilsizer

618/327-4381, Ext. 252

1.4 General Source Description

Nascote Industries is located at 18310 Enterprise Avenue in Nashville and engaged in the manufacturing and painting of exterior quality parts for the automotive industry. The plant operates the following significant emission units at this site: coating booths, paint mixing, glue bonding machines, used solvent storage, and fuel combustion emission units.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
Cd	Cadmium
CEMS	Continuous Emission Monitoring System
cfm	Cubic foot per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
ERMS	Emission Reduction Market System
°F	Degrees Fahrenheit
ft	Feet
G	Grams
gal	Gallons
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HMIWI	Hospital/Medical/Infectious Waste Incinerator
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
L	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mg	milligram
mmBtu	Million British thermal units
mmscf	Million standard cubic feet
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
Pb	Lead
NSPS	New Source Performance Standards

PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
scf	Standard cubic feet
scm	Standard cubic meters
SO_2	Sulfur Dioxide
T	Ton
TEQ	Toxic equivalency
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Isocyanate Storage Tank
Wastewater Treatment
Cold Cleaning Machines

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

b. Die casting machines where a metal or plastic is formed under pressure in a die [35 IAC 201.210(a)(12)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 1	**Coating Operations**		
	Color Line		
	Paint Booths P1 (A) – P1 (E)		Salem RTO/RCO
	Flash-Off Zones		Durr Oxidizer
	Color Line Bake Oven P2		Salem RTO/RCO
	Prime Line		
	Paint Booths P4 (A) – P4 (D)		None
	Prime Flash-Off Zones North & South P4 (I) – P4 (J)		Durr Oxidizer
	Bake Oven P5		Filter
	Three Spray Test Booths (P13B, C, D)	1999	
Unit 2	**Paint Mixing Operations**		
	Prime Line Doghouse North (P7A) and South (P7B)	1986	None
	Paint Kitchen (P12)	1999	None
Unit 3	**Glue Bonding Machine "A"**	1986	None
Unit 4	**Used Solvent Storage**	1986	Salem RTO/RCO
Unit 5	**Fuel Combustion Units**		
	Air Supply House Units #3 Through #7 (For Color Paint Line)	1986	None
	Air Supply House Units #1 and #2 (For Prime Paint Line)	1986	None
	Roof Top Temprite Units "A" and "B"	1986	None
	Two Cambridge Space Heaters	None	None
	Eclipse Ratiomatic Heater	None	None
	Boilers	1986	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. 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 overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. 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 the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an

approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source, which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.6 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	322.28
Sulfur Dioxide (SO_2)	0.31
Particulate Matter (PM)	20.38
Nitrogen Oxides (NO_x)	64.77
HAP, not included in VOM or PM	-----
Total	407.74

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

a. The annual emissions from the source shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)	Underlying Rules
VOM	322.3	40 CFR 52.21

The limits on VOM are limitations established in Permits 89070026, 93050126, and 93110078, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permits does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. See Condition 7.1.6 [T1].

Compliance with annual limits 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).

b. Attachment 1 of this permit contains daily VOM emission limitations being established in the PSD Permit 89070026 for different source operations.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified

by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

5.10 PSD Permit

On October 30, 1991 the PSD Construction Permit #89070026 was issued for an afterburner system to control the color line and prime line coating operations (spray booths). Because of the nature of this project (BACT requirements; federally enforceable emissions, production, operating limits being established for the entire source along with limits for individual emission units; complexity; and importance of this project), the entire permit is placed into this condition.

PSD Permit #89070026

In conjunction with this permit, approval is given with respect to the federal rules for Prevention of Significant Deterioration of Air Quality Regulations (PSD) to construct the above referenced equipment and to operate the plant as described in the application, with the new afterburner system, in that the Illinois EPA finds that that the application fulfills all applicable requirements of 40 CFR 52.21. This approval is issued pursuant to the Clean Air Act, as amended, 42 U.S.C 7401 et. seq., the Federal regulations promulgated thereunder at 40 CFR 52.21 for Prevention of Significant Deterioration of Air Quality (PSD), and a Delegation of Authority agreement between the United States Environmental Protection Agency and the Illinois EPA for the administration of the PSD Program. This approval becomes effective in accordance with the provisions of 40 CFR 124.15 and may be appealed in accordance with the provisions of 40 CFR 124.19. This approval is also based upon and subject to the findings and conditions which follow.

5.10.1 Findings

a. Nascote Industries has constructed a plastic part coating plant in Nashville. The equipment which was constructed includes color line and prime line coating operations and related equipment. The Permittee plans to construct an additional afterburner control system for emissions of volatile organic compounds from the coating operations.

b. Nascote is located in Washington County. The area is currently designated attainment for all air contaminants.

c. The plant is a major source under PSD rules. The plant is a major source for emissions of volatile organic compounds (VOC). It will become a significant source for emissions of carbon monoxide (CO) and nitrogen oxides (NO_x) when the new control system is installed. The plant is subject to the PSD rules for emissions of these contaminants.

d. The plant must be operated so that emissions are in compliance (i) all applicable Board emission standards and (ii) Best Available Control Technology (BACT) on emissions of VOC, CO, and NO_x.

e. The air quality analysis submitted by Nascote and reviewed by Illinois EPA shows that the proposed project will not cause violations of the ambient air quality standards for ozone (emissions of volatile organic compounds), carbon monoxide, and nitrogen oxides.

f. The Illinois EPA has determined that the construction of the proposed project complies with all applicable Illinois Air Pollution Control Board Regulations and the federal Prevention of Significant Deterioration of Air Quality Regulations (PSD), 40 CFR 52.21.

g. A copy of the application and the Illinois EPA's formal review of the application and a draft of this permit were placed in a location in the vicinity of the project, and the public was given notice and opportunity to examine this material and to submit comments and to request a public hearing on this matter.

The Illinois EPA is issuing approval subject to the following conditions and consistent with the specifications and data included in the application. Any departure from the conditions of this approval or terms expressed in the application would need to receive prior written authorization of the Illinois EPA.

Conditions 5.10.2(a) through (n) represent the application of Best Available Control Technology as required by the Prevention of Significant Deterioration regulations.

5.10.2 <u>Conditions</u>

a. The prime line and color line shall be operated so that the flow of air through any natural draft openings on the line which are normally open is into the line and essentially all discharge of air to the atmosphere occurs through forced draft openings.

b. i. Afterburners shall be operated and maintained to control the exhaust(s) from the ovens on the color and prime line.

ii. These afterburners shall be operated and maintained to reduce the outlet concentration of VOC to no more than 10 ppm or 10% of the inlet concentration, whichever is greater.

iii. These afterburners shall be operated whenever the respective line is in operation.

c. i. An afterburner system shall be installed, operated and maintained to control stacks 2, 3, 4 and 5 of the color line (spray booth 2 through 5 exhausts) and stacks 1 and 2 of the prime line (spray booth 1 and 2 exhausts).

ii. A. Stack 1 of the Color Line (Prep Spray Booth Exhaust) shall also be controlled by this afterburner system if uncontrolled emissions of VOC would

exceed 54 tons/year. Compliance with this limit shall be determined based on compliance with enforceable limitations on type and amount of coating used in this booth and amount of purge solvent used and recovery practices, as established elsewhere by federally enforceable permit conditions.

B. An individual flash tunnel stack of the color line and prime line shall also be controlled by the afterburner system if emissions of VOC from the associated Flash Tunnel exceed 6.3 tons/year. Compliance with this limit shall be determined from representative values for distribution of VOC emissions and operating records for use of VOC containing material on a line. The values for the relationship between VOC applied in different booths to the flash tunnel exhaust itself shall be determined from representative measurements conducted pursuant to testing condition of this permit. The values for use of VOC containing material shall be based on operating records for VOC applied in coatings and use of purge which is not recovered.

C. If Stack 1 or a flash tunnel stack is controlled by the afterburner, the stack shall continue to be so controlled even if the VOC emissions fall below the above applicability criteria.

iii. This afterburner system shall be operated and maintained to reduce the outlet concentration of VOC to no more than 10 ppm or 5% of the inlet concentration, whichever is greater. Compliance with this requirement shall be determined by testing and monitoring requirements in accordance with conditions of this permit.

iv. This afterburner system shall be operated whenever a line is in operation, except as provided in paragraph d and e.

d. i. If routine preventative maintenance of the afterburner system cannot be completed during a period when the coating lines are idle, as scheduled, the afterburner system need not be

operated, to the extent necessary to perform such maintenance.

ii. During a malfunction of the afterburner, as defined at 40 CFR 60.2, the afterburner system need not be operated.

iii. If the total time during which the afterburner does not operate, as addressed above, exceeds 5 days in any calendar year, a detailed evaluation of the condition of the afterburner system and maintenance practices shall be performed and a written report submitted to the Illinois EPA.

e. i. If operation of the afterburner system would contribute to, cause or seriously threaten the occurrence of a natural gas emergency for the City of Nashville, the afterburner system need not be operated to the extent reasonably possible, to prevent such an emergency. The existence of such an emergency condition shall be declared by the natural gas supplier, e.g., the City of Nashville, who shall describe the emergency and inform the Permittee of the beginning and end of the emergency as it affects the Permittee.

ii. Prior to renewing or revising its natural gas supply agreement, the Permittee shall require a description of the likely circumstances that would lead to a natural gas emergency, the causes for such circumstances, and detailed evidence that reasonable measures to prevent such circumstances have been taken. The agreement shall address the conditions and circumstances under which the gas supplier may declare a fuel emergency.

iii. The Permittee shall keep records of its activities pursuant to paragraphs (e)(i) and (ii), above.

iv. If the afterburner is not fully operational, as addressed above, on more than 5 days in any calendar year, or during a day when the average ambient temperature exceeds 20^0F a detailed written report shall be submitted to the Illinois EPA by the Permittee. This report shall indicate whether the emergency was a consequence of circumstances for which reasonable action can be taken to prevent reoccurrence and by whom such action can be taken.

f. At all times, including periods of preventative maintenance, malfunction, and natural gas emergency the afterburner system and associated coating lines shall, to the extent practical, be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.

g. i. As an alternative to the limits in Condition c(ii), the Permittee may comply with the following limits. Compliance with these limits shall be determined on a daily-weighted average basis for each coating line.

Prime - 14.5 lb VOC/gallon applied coating solids

Topcoat - 13.5 lb VOC/gallon applied coating solids

ii. For the purpose of this condition transfer efficiency shall be determined by actual measurements at the plant using the methods and procedures specified in USEPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of an Automobile and Light-Duty Truck Topcoat Operations", December 1988, or other comparable methodology approved by the Illinois EPA.

iii. The Permittee shall notify the Illinois EPA in writing one year in advance of operation with the intent to comply with this condition. Prior to initiating operation pursuant to this condition the Permittee shall obtain appropriate new or revised permits from the Illinois EPA.

h. i. The volatile organic compound emissions from purging of color line coating applicators (excluding the prep booth) and from the color line purge solvents collection system shall be controlled by the color line and prime line afterburner.

ii. The volatile organic compound emissions from purging of prime coating applicators and use of solvent for clean up operations shall be controlled by at least 70% from uncontrolled levels by collection, closed storage and recycle or offsite disposal of solvent. For the purpose of this requirement "use of solvent for clean up operations" includes use of pure solvent in degreasers and other

cleaning operations. Compliance with this requirement shall be determined from the overall recovery of purge and cleanup solvent at the plant on a monthly basis, provided that the recovery equipment and practices in uncontrolled areas of the coating lines are equal to or better than those in controlled areas of the coating lines.

i. i. Commercially produced parts which proceed from production and storage to the coating line within typical schedules shall not be cleaned or wiped prior to coating, other than those parts designated as rework, using any liquid which contains more than 1% VOC by weight.

ii. Parts which are stored for a typical amounts of time prior to coating or parts which are being evaluated prior to commercial production, may be wiped prior to coating using a liquid which contains more than 1% VOC by weight. The emissions of VOC from such wiping shall not exceed 8 lb/hour. Compliance with this limit shall be determined from the VOC content of the wiping agent used.

j. i. Parts that are required to be cleaned, reworked and repainted may be wiped and cleaned with either isopropyl alcohol or naphtha solvent prior to repainting.

ii. Emissions from rework parts wiping and cleaning process shall not exceed 8 lb/hr.

iii. The usage of solvent in the rework parts wiping and cleaning process shall not exceed 10716 gallons per year.

iv. This condition establishes enforceable limitations on the rework parts wiping and cleaning process which restrict annual emissions to less than 35.20 tons per year.

k. i. High pressure water sprays or other processes not resulting in VOC emissions shall be used for cleaning conveyor lines.

ii. For storage, handling and processing of coating in and associated with the paint mix room and for the purge solvent and purged material system located outside the coating line, the requirements of 35 Ill. Adm. Code, Part 215 Section 215.624 - Covers, 215.628 - Leaks, and 215.630 Clean up, as in effect on

December 31, 1990, shall be followed to minimize VOC emission. It should be noted, that after the issuance of the initial PSD permit approval 89070026 on October 30, 1991, substantial modifications being performed in operations of the purge solvent storage by adding total enclosure and the regenerative thermal oxidizer as an air emission control device. All these improvements allow to achieve much better air emissions control and application of more advanced BACT requirements in comparison with initial PSD condition shown above.

iii. Covers shall be installed on the trenches and pits of the waterwash/paint sludge system, i.e., the ESKA system. These covers shall be in place except when inspection or maintenance require access. These covers shall completely cover the opening, except as necessary to provide safe clearance for gauging systems, rotating shafts or other features of the system. These covers shall maintain contact with the rim of the opening or adjacent cover, for at least 90% of the perimeter distance.

l. The mold release agents used in plastic molding shall comply with the following limits:

i. External mold release - greater than 70% by weight water as applied.

ii. Internal mold release and other release agents - negligible volatile organic material content, i.e., less than 0.5% VOC by total volume as applied.

m. The adhesive used in assembling plastic parts shall not emit more than 3 lbs of volatile organic compounds per 100 lbs of adhesive.

n. i. Emissions of carbon monoxide from afterburners shall not exceed 20 ppm.

ii. Emissions of nitrogen oxides from afterburners shall not exceed 0.11 lb per million Btu heat input, with heat input based on fuel input to the afterburner.

iii. Emissions of nitrogen oxides and carbon monoxide from fuel combustion, as they are not addressed above, shall be limited by use of natural gas, propane, or liquefied petroleum gas, as the only commercial fuels.

o. The VOM limits for color and prime coating lines are based on the assumption that 5.5% of the VOC in coatings received at the plant are released to the atmosphere at other emission points and processes (paint mixing and waterwash/sludge system).

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 1: Coating Operations

7.1.1 Description

Nascote Industries is involved into an automotive plastic part coating operations. The parts are conveyed to the paint lines where they are painted with the desired colors. After the parts are painted they are conveyed to a bake oven to be dried. After the paint is baked onto the parts they follow a cooling areas and then are visually inspected for any defects and stored for shipping.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 1:	***Color Line***	
	Paint Booths P1 (A) – P1 (E)	Salem RTO/RCO
	Color Line Bake Oven P2	Durr Oxidizer
	Prime Line	
	Paint Booths P4 (A) – P4 (H)	Salem RTO/RCO
	Prime Flash-Off North & South P4 (I) – P4 (J)	None
	Bake Oven P5	Durr Oxidizer
	Three Spray Test Booths (P13B, C, D))	Filter

7.1.3 Applicability Provisions and Applicable Regulations

a. An "affected paint booth" for the purpose of these unit specific conditions is a process emission unit used for primary or repair coating of automotive plastic parts.

b. The following VOM emission limits are applied for affected paint booth operations, pursuant to 35 IAC 215.301 and 215.302:

i. Uncontrolled Emissions

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 source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

ii. Emissions controlled by Catalytic or Thermal Incinerators

Emissions of organic material in excess of those permitted by 35 IAC 215.301 are allowable if such emissions are controlled by thermal or catalytic incineration, so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide or water.

c. The affected paint booths 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 on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.1.4 Non-Applicability of Regulations of Concern

a. Each affected paint booth is not subject to 35 IAC 216.141 and 212.184, because such paint booth is a process emission unit but not a fuel combustion device.

b. Each affected paint booth is not subject to 35 IAC Part 215, Subpart F “Coating Operations”, because an automotive plastic parts coating operations are not regulated by Subpart F.

7.1.5 Operating Requirements and Work Practices

a. Each affected paint booth and thermal/catalytic oxidizer shall only be operated with natural gas as the fuel.

b. An oxidizer shall be in operation at all times that the associated paint booth(s) is in operation and emitting VOM, except the time when an alternative compliance is demonstrated through an application of coatings, as discussed in Condition 5.10.2(g)(i), on the daily-weighted average basis, and routine maintenance of an oxidizer or a natural gas emergency, as described in Conditions 5.10.2(d) and (e) of this permit.

c. An oxidizer shall not be seasonally shut down as would be allowed in 35 IAC 215.106.

d. The afterburner combustion chamber of the RTO/RCO shall be preheated to the manufacturer's recommended temperature but not lower than 1400^0 F when operating as an RTO and 1000^0 F when operating as an RCO, before the coating operation is begun, and this temperature shall be maintained during operation of the affected paint booth.

e. The Permittee shall follow good operating practices for the oxidizers and filters, including periodic maintenance and repair of defects.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected paint booths are subject to the following:

a. See Attachment 1 of this permit for the daily VOM emission limitations being established in the PSD Permit 89070026 for different operations, including coating.

b. Emissions and operation of three spray test booths (P13B, C, D) shall not exceed the following limits:

Material	Usage (Gal/Mo)	Usage (Gal/Yr)	VOM Emissions (Ton/Mo)	VOM Emissions (Ton/Yr)
Paint	250	1,500	0.68	4.05
Purge Solvent	84	500	0.21	1.28
				5.33

The above limitations were established in Permit 99020009, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules

for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

c. Compliance with annual limits 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).

7.1.7 Testing Requirements

a. Upon request from the Illinois EPA or USEPA the Permittee shall conduct tests in accordance with procedures of 35 IAC 215.102 to measure the overall control and performance of an afterburner controlling the affected paint booth. 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.

b. Upon request from the Illinois EPA or USEPA the VOM content of each coating applied on the affected paint booth shall be determined by using Method 24 of 40 CFR 60, Appendix A. Any alternative 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 method will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].

c. The percent concentration of solvent in the VOM containing waste from the affected paint booth shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Methods 8260.

7.1.8 Monitoring Requirements

a. The catalytic oxidizer shall be equipped with continuous monitoring devices which are installed, calibrated, operated and maintained according to vendor specifications at all times the oxidizers are in use. These monitoring devices shall monitor the temperature rise across each catalytic bed or VOM concentration of exhaust.

b. The thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor’s specifications at all times that the thermal oxidizer is in use. This device shall monitor

combustion chamber temperature of the thermal oxidizer.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for all affected paint booths to demonstrate compliance with Conditions 5.5.1, 5.5.3, and 7.1.6 of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. The name and identification number of each coating and clean-up solvent as applied on each affected paint booth;

b. The usage of each coating, in units of gallons/month and gallons/year;

c. The usage of clean-up solvents, in units of gallons/month and gallons/year;

d. VOM/HAP content of each coating applied (wt. %);

e. VOM/HAP content of each clean-up solvent applied (lb/gal);

f. The density of each coating and clean-up solvent applied (lb/gal);

g. Amount of the solvent wastes collected (gal/mo and gal/yr);

h. The average VOM content (wt. %) in the collected waste; and

i. Total VOM/HAP emissions (ton/mo and ton/yr) calculated based on the Compliance Procedures in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected painting booth with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations 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. The report shall include the emissions released in accordance with the

recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational changes with respect to the affected painting booths without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the coatings and clean-up solvents used, provided the affected paint booths continue to comply with emission limitations established in this permit for affected paint booths.

7.1.12 Compliance Procedures

a. Compliance with the PM emission limits established by 35 IAC 212.321 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected paint booth.

b. Compliance of the affected painting booths with VOM emission limits established in Conditions 5.5.1, 5.10.2, 7.1.6, and Attachment 1 of this permit shall be determined by using the formulas listed below:

i. <u>Controlled Emissions</u>

A. Coating Operations

Emissions = [Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM Content of the Coating (wt. %)] x [Capture Efficiency (100 – capture efficiency)/100 x Destruction Efficiency (100 – destruction efficiency)/100]

B. Cleanup Operations

Emissions = [Actual Clean-up Solvent Usage (gal) x Solvent Density (lb/gal) x VOM Content of the Clean-up Solvent (wt. %)] - [VOM Containing Waste (gal) x Waste Density (lb/gal) x VOM Content in Waste (wt. %)]

ii. Uncontrolled Emissions

A. Coating Operations

Emissions = [Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM Content of the Coating (wt. %)]

B. Cleanup Operations

Emissions = [Actual Clean-up Solvent Usage (gal) x Solvent Density (lb/gal) x VOM Content of the Clean-up Solvent (wt. %)] - [VOM Containing Waste (gal) x Waste Density (lb/gal) x VOM Content in Waste (wt. %)]

7.2 Unit 2: Paint Mixing Operations

7.2.1 Description

Paint mixing operations are involved into customized paint preparation prior to an application of coatings.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 2:	Prime Line Doghouse North (P7A) and South (P7B);	None
	Paint Kitchen (P12)	None

7.2.3 Applicability Provisions and Applicable Regulations

a. An "affected paint mixing unit" for the purpose of these unit specific conditions is a process emission unit as described in Conditions 7.2.1 and 7.2.2.

b. The affected paint mixing unit is 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 on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

c. The affected paint mixing unit is subject to the following requirements of 35 IAC 215.301:

   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 35 IAC 215.302, 215.303, 215.304, and the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected paint mixing unit not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected paint mixing unit does not use an

add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Operating Requirements and Work Practices

None

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Conditions 5.5.1 and 5.5.3, the affected paint mixing unit (paint kitchen) is subject to the following limits:

None

7.2.7 Testing Requirements

N/A

7.2.8 Monitoring Requirements

N/A

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected paint mixing unit to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Total solvent/paint used, in terms of gal/mo and gal/year;

b. Solvent/paint used by paint kitchen, in terms of gal/mo and gal/year;

c. Density of solvent/paint used, lb/gal;

d. Actual hours of operation per year and per month for the affected paint mixing line; and

e. Monthly VOM emissions calculated using the emission factor of 0.02 lb VOM solvent (paint) lost/lb solvent (paint) used. Annual VOM emissions, as required by this section and Condition 9.7, shall be calculated based on the compliance procedures in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected the paint

mixing units with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations 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. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1, 5.5.3, and 7.2.6 of this permit shall be based on the recordkeeping requirements of Condition 7.2.9 and the emission factors and formulas listed below:

a. VOM emissions (total) = solvent/paint usage (gal) x density (lb/gal) x 0.02

VOM emissions (paint kitchen) = solvent/paint usage (gal) x density (lb/gal) x 0.02

This emission factor is established for VOM emissions from paint mixing operations in "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", March 1998, Section 5.1.2.

b. The VOM losses equal to 5.5% and established in Condition 5.10.2(o) for clarification purposes are not the emission limitation or emission factor and shall not be used to calculate actual emissions from affected paint mixing units.

7.3 Unit 3: Glue Bonding Machines

7.3.1 Description

After automotive bumpers being molded, they are proceeded for gluing where reinforcements are glued into the inside of the bumpers on the glue bonding machines/presses “A”, “B”, and “C”.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 3:	Glue Bonding Machines “A”, “B”, and “C”	None

7.3.3 Applicability Provisions and Applicable Regulations

a. An "affected glue bonding machine" for the purpose of these unit specific conditions is a process emission unit as described in Conditions 7.3.1 and 7.3.2.

b. Each affected glue bonding machine is 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 on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

c. The affected glue bonding machine is subject to the following requirements of 35 IAC 215.301:

> 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 35 IAC 215.302, 215.303, 215.304, and the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected glue bonding machine not being subject to 40 CFR Part 64, Compliance

Assurance Monitoring (CAM) for Major Stationary Sources, because the affected glue bonding machine does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Operating Requirements and Work Practices

None

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected glue bonding machine is subject to the following:

a. See Attachment 1 for the daily VOM emission limit for adhesive application.

b. The adhesive used shall not exceed more than 3 lb of VOM per 100 lb of adhesive applied. This limitation determines the actual VOM emission being released from adhesive application, but not the VOM content in applied adhesives. Polymerization of monomer (VOM) leaves just only a fraction (approximately 3%) of free monomer, which is released into atmosphere.

   The above limitation was established in Permit 89070026, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.3.7 Testing Requirements

Upon request from the Illinois EPA or USEPA the Permittee shall conduct tests in accordance with approved test procedures established by the USEPA to measure VOM content of applied adhesives.

7.3.8 Monitoring Requirements

N/A

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected glue bonding machine to demonstrate compliance with Condition 5.5.1, 5.5.3 and 7.3.6 of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Total adhesive usage, in terms of lb/month and lb/year;

b. VOM/HAP adhesive content, wt. %; and

c. Daily and annual VOM/HAP emissions calculated in accordance with the compliance procedures in Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected glue bonding machine with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations 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. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1, 5.5.3 and 7.3.6 of this permit shall be based on the recordkeeping requirements of Condition 7.3.9 and the formulas listed below:

VOM/HAP Emissions = Glue Usage (lb) x VOM/HAP Content (wt. %) x [Monomer Reaction Factor (1-0.95)]

7.4 Unit 4: Used Solvent Storage

7.4.1 Description

Purge solvents from the coating lines are collected in two 300-gallon totes and two 60-gallons drums operated in the total enclosure.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 4	Two 300-Gallon Totes and Two 60-Gallons Drums	Total Enclosure and Salem Regenerative Thermal Oxidizer

7.4.3 Applicability Provisions and Applicable Regulations

a. An "affected used solvent storage" for the purpose of these unit specific conditions is a process emission unit as described in Conditions 7.4.1 and 7.4.2.

b. The affected used solvent storage is subject to the following requirements of 35 IAC Part 215, Subpart K:

i. 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 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of Subpart K shall only apply to photochemically reactive material [35 IAC 215.301].

ii. Emissions of organic material in excess of those permitted by 35 IAC 215.301 are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 215.302(a)].

7.4.4 Non-Applicability of Regulations of Concern

None

7.4.5 Operating Requirements and Work Practices

a. Operation of the affected used solvent storage shall be performed in a manner consistent with requirements established in Conditions 5.10.2(d), (e), and (k).

b. The capture system of the affected used solvent storage shall be designed, operated and maintained in accordance with the criteria in 35 IAC Part 218, Appendix B, Procedure T.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected solvent storage is subject to the following:

See Attachment 1 for the daily VOM emission limit for the solvent purge storage.

7.4.7 Testing Requirements

The percent concentration of solvent in the VOM containing waste received in used solvent storage shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Methods 8260.

7.4.8 Monitoring Requirements

N/A

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected solvent storage to demonstrate compliance with Conditions 5.5.1, 5.10.2 and Subsection 7.4 of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Total purge solvent throughput, gal/mo and gal/yr.

b. VOM/HAP content (wt. %) of the purge solvent collected, as determined in accordance with Condition 7.4.7.

c. Hours of operation (separately with and without control), hr/mo and hr/yr.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected used solvent storage with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations 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. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

During periods when the Regenerative Thermal Oxidizer/ Regenerative Catalytic Oxidizer is idled, as allowed in Conditions 5.10.2(d) and (e), the affected used solvent storage may be operated as an uncontrolled emission unit.

7.4.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 and 7.4.6 of this permit shall be based on the recordkeeping requirements of Condition 7.4.9 and the emission factors and formulas listed below:

a. Uncontrolled Emissions

During a stack test conducted in April 1993, the VOM emissions had been indicated with the concentration equal to 180 ppm at 1,550 scfm of flow rate. Hourly VOM emission rate derived from these data is equal to 1.91 lb VOM/hr.

Daily and Annual VOM emissions = 1.91 lb/hr x Hours of Operation

b. Controlled Emissions

Uncontrolled Emissions (lb/hr) x [Destruction Efficiency (100 – Destruction Efficiency)/] x Hours of Operation.

7.5 Unit 5: Fuel Combustion Units

7.5.1 Description

Natural gas-fired units are used to provide heat and steam for the proper operation of coating lines.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 5	**Air Supply House:**	None
	Color Line Ash #3 - #7 Prime Line Ash #1 and #2 (All these units are in the range of 7.7 to 19.25 mmBtu/hr of a heat capacity per unit.)	
	Two Cambridge Space Heaters (5.4 mmBtu/hr each)	None
	Eclipse Ratiomatic Heater (5.0 mmBtu/hr)	None
	Hot Water Units:	
	Two Boilers (8.4 mmBtu/hr heat capacity each)	None

7.5.3 Applicability Provisions and Applicable Regulations

a. An "affected fuel combustion unit" for the purpose of these unit specific conditions is an emission unit described in Conditions 7.5.1 and 7.5.2.

b. Air supply house units with a heat capacity more than 10 mmBtu/hr are subject to 35 IAC 216.121. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected 50 percent excess air.

7.5.4 Non-Applicability of Regulations of Concern

a. Each affected fuel combustion unit is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides from Existing Fuel Combustion Emission Sources in Major Metropolitan Areas, because the actual heat input of each affected fuel combustion unit is less than 73.2 MW (250 mmBtu/hr).

b. Pursuant to 35 IAC 215.303, fuel combustion emission units are not subject to 35 IAC Part 215, Subpart K: Use of Organic Material.

c. All affected fuel combustion units are not subject to requirements 40 CFR Subparts Db and Dc because these units either being constructed before June 9, 1989 or having heat input capacity of less than 100 mmBtu/hr.

7.5.5 Operating Requirements and Work Practices

Each affected fuel combustion unit shall only be operated with natural gas as the fuel.

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected fuel combustion units are subject to the following:

None

7.5.7 Testing Requirements

N/A

7.5.8 Monitoring Requirements

N/A

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fuel combustion unit to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Total natural gas usage (mmscf/mo and mmscf/yr) for all affected fuel combustion units;

b. Emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected heat-treating lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations 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. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

a. Compliance with Condition 7.5.3(b) is assumed to be achieved by work-practices inherent in operation of affected fuel combustion units, so that no compliance procedures are set in the permit addressing this regulation.

b. Compliance with the emission limits in Condition 5.5.1 shall be based on the following emission factors:

Emissions from the fuel combustion

Pollutant	Emission Factor (lb/mmscf)
PM	7.6
NO_x	100.0
VOM	5.5
CO	84.0

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after June 25, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before

commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation, which are intended to be made, including sampling and monitoring locations;

e. The test method(s), which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (“Title I provisions”) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be

submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Limitations For Equipment and Operations

Area/Operation or Process Equipment	Volatile Organic Material Emissions (Lb/Day)	Total Heat Input (Million Btu/Hr)
Molding		
Internal Mold Release	1.0	--
External Mold Release	9.0	--
Assembly		
Adhesive Application	44.0	--
Color Line	1000.0	36.8 (Process)
Prime Line	450.0	27.3 (Process) 40.5 (New Afterburner System)
Solvent Purge/Cleanup		
Color Line-Booth 1	90.0	--
Other spray booths	--*	--
Parts Wiping	192.9	--
Touchup Painting	7.1	--

* No limit set, addressed with emissions of the color line and prime line discharged through the afterburner.

The above limitations contain revisions to previously issued PSD Permit 89070026. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, total daily VOM emissions have been decreased [T1R].

10.2 Attachment 2 - Allowable Emissions of Particulate Matter

10.2.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

a. 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 on or 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)].

b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

Where:

P = Process weight rate
E = Allowable emission rate

i. For process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P Mg/hr	E kg/hr	P T/hr	E lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2.2 Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972

a. 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 prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

b. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable

emission rates specified in the following equation:

$$E = C + A(P)^B$$

Where:

P = Process weight rate
E = Allowable emission rate

i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

c. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P Mg/hr	E kg/hr	P T/hr	E lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20

Metric		English	
P Mg/hr	E kg/hr	P T/hr	E lb/hr
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.3 Attachment 3 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.4 Attachment 4 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

- Are not modifications under any provision of Title I of the CAA; and

- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- The source’s suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. <u>Significant Permit Modification</u>

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;

- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements, which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information

1. Source name:		
2. Source street address:		
3. City:		4. Zip code:
5. Is the source located within city limits?		☐ Yes ☐ No
6. Township name:	7. County:	8. I.D. number:

Owner Information

9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)

14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information

19. Who is the applicant? ☐ Owner ☐ Operator	20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Illinois EPA is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	☐ Yes ☐ No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application

Note 1: Answering “No” to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.
Authorized Signature:

BY:

_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source’s CAAPP permit, if necessary.

10.6 Attachment 6 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.

3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.

4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.

5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.

6. Information addressing any outstanding transfer agreement pursuant to the ERMS.

7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official’s signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.

9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.html.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

AB:psj