

217/785-1705

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

PERMITTEE

Interlake Mecalux, Inc.
Attn: Alejandro Fuentes
1600 North 25th Avenue
Melrose Park, Illinois 60160

<u>Application No.:</u> 02080044	<u>I.D. No.:</u> 031186AHL
<u>Applicant's Designation:</u>	<u>Date Received:</u> April 16, 2008
<u>Subject:</u> Rack Painting Operation	
<u>Date Issued:</u> May 14, 2014	<u>Expiration Date:</u> May 14, 2024
<u>Location:</u> 1600 North 25th Avenue, Melrose Park, Cook County	

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

Hydro-Soluble Process: lines #1 and #2:
Hydro-Soluble Degreasing Sprinkler (Caustic Degreaser);
Hydro-Soluble Pasivator/Demineralization Sprinkler;
Hydro-Soluble Paint Spray Booth Controlled by Filter; and
One Regenerative Thermal Oxidizer (RTO) to Control Emissions from
Hydro-Soluble Process Line #1,

Cataphoresis Process: Lines #1 and #2:
Cataphoresis Painting Dip Tank; and
Cataphoresis Degreasing Dip Tank (Caustic Degreaser)

Metal Bending;
Welding;
Natural Gas-Fired Emission Units; and
Hand Cleaning Process

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. This federally enforceable state operating permit (FESOP) is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single hazardous air pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.

- ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm.
 - iii. To establish federally enforceable Emission Reduction Market System (ERMS) provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for the purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205, which are described in Attachment B.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
- 2a. The welding operations at this source are subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63 Subparts A and XXXXXX. The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 63.11514(b)(5), the provisions of 40 CFR 63 Subpart XXXXXX apply to each new and existing affected source listed and defined in 40 CFR 63.11514(b)(1) through (5) if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in 40 CFR 63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.
- b. Pursuant to 40 CFR 63.11515(a), if you own or operate an existing affected source, you must achieve compliance with the applicable provisions in 40 CFR 63 Subpart XXXXXX by July 25, 2011.

- 3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).
4. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 5a. Pursuant to 35 Ill. Adm. Code 218.204(j), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Miscellaneous Metal Parts and Products Coating. Except as otherwise provided in 35 Ill. Adm. Code 218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis

test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows: On and after May 1, 2012, the limitations in 35 Ill. Adm. Code 218.204(q) shall apply to the Miscellaneous Metal Parts and Products Coating category of coating.

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

		kg/l (lb/gal)	kg/l (lb/gal)
i.	General one component coating	coatings	solids
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Clear coating	0.52 (4.3)	1.24 (10.34)
ii.	General multi-component coating		
	Air dried	0.34 (2.8)	0.54 (4.52)
iii.	Extreme performance coating		
	Air dried	0.42 (3.5)	0.80 (6.67)

		kg/l (lb/gal)	kg/l (lb/gal)
		coatings	solids
iv.	Pretreatment coating	0.42 (3.5)	0.80 (6.67)
v.	Repair coats and touch-up coatings		
	Air dried	0.42 (3.5)	
vi.	All other coatings		
	A. Air dried	0.40 (3.3)	0.73 (5.98)
	B. Baked	0.34 (2.8)	0.54 (4.52)
b.	Pursuant to 35 Ill. Adm. Code 218.207(a), any owner or operator of a coating line subject to 35 Ill. Adm. Code 218.204, except coating lines subject to 35 Ill. Adm. Code 218.204(q)(6), may comply with 35 Ill. Adm. Code 218.207 (Alternative Emission Limitations), rather than with 35 Ill. Adm. Code 218.204, if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), (k), (l), (m), or (n) (depending upon the source category) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in 35 Ill. Adm. Code 218.105 and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(e); and the control device is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d) and the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use. A capture system and control device, which does not demonstrate compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), (k), (l), (m), or (n) may be used as an alternative to compliance with 35 Ill. Adm. Code 218.204 only if the alternative is approved by the Illinois EPA and approved by the USEPA as a SIP revision.		
c.	Pursuant to 35 Ill. Adm. Code 218.207(b)(1), the coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency; or		
d.	Pursuant to 35 Ill. Adm. Code 218.207(n)(1), on and after May 1, 2012, no owner or operator of a miscellaneous metal parts and products coating line, plastic parts and products coating line, or pleasure		

craft surface coating line that is equipped with a capture system and control device shall operate the subject coating line unless the capture system and control device provide at least 90 percent reduction in the overall emissions of VOM from the coating line.

- e. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall only apply to photochemically reactive material.
- 6a. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM because the source is not a major source of HAP emissions. This is a result of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs.
- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESAHP) for Paint Stripping And Miscellaneous Surface Coating at Area Sources, 40 CFR Part 63 Subpart HHHHHH because the source does not perform spray application of coatings that contain the target HAP, as defined in 40 CFR 63.11180, to a plastic and/or metal substrate on a part or product
- c. This permit is issued based on the coating operations at this source not being subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63 Subpart XXXXXX, because the coating operations at this source do not use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens.
- 7. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hour (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

- 8a. This permit is issued based on the caustic degreasers at this source not being subject to 35 Ill. Adm. Code Part 218 Subpart E (Solvent Cleaning). Pursuant to 35 Ill. Adm. Code 218.181, the requirements of 35 Ill. Adm. Code 218.182, 218.183, 218.184, and 218.186 shall apply to all cold cleaning, open top vapor degreasing, and conveyORIZED degreasing operations which use volatile organic materials.
- b. This permit is issued based on the hand cleaning process not being subject to 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;
- c. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(B)(xii), notwithstanding 35 Ill. Adm. Code 218.187(a)(1) cleaning operations for emission units within the miscellaneous metal parts coating source category shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (f), and (g).
- d. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- e. This permit is issued based upon the hand cleaning process at this source not being subject to the control requirements of 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units). Pursuant to 35 Ill. Adm. Code 218.980(d), no limits under 35 Ill. Adm. Code Part 218 Subpart TT shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 2.3 Mg (2.5 tons) per calendar year if the total emissions from such emission units not complying with 35 Ill. Adm. Code 219.986 does not exceed 4.5 Mg (5.0 tons) per calendar year.
- 9a. Pursuant to 40 CFR 63.11516(f), if you own or operate a new or existing welding affected source, you must comply with the requirements in 40 CFR 63.11516(f)(1) and (2) for each welding operation that uses materials that contain MFHAP, as defined in 40 CFR 63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a

rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in 40 CFR 63.11516(f)(3) through (8). The requirements in 40 CFR 63.11516(f)(1) through (8) do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

- i. You must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in 40 CFR 63.11519(c)(4), "Notification, recordkeeping, and reporting requirements."
- ii. You must implement one or more of the management practices specified in 40 CFR 63.11516(f)(2)(i) through (v) to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
 - A. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
 - B. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
 - C. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
 - D. Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
 - E. Use a welding fume capture and control system, operated according to the manufacturer's specifications.
- iii. You must perform visual determinations of welding fugitive emissions as specified in 40 CFR 63.11517(b), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations. You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in 40 CFR 63.11519(c)(2), "Notification, recordkeeping, and reporting requirements."
- iv. If visible fugitive emissions are detected during any visual determination required in 40 CFR 63.11516(f)(3), you must comply with the requirements in 40 CFR 63.11516(f)(4)(i) and (ii).

- A. Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 40 CFR 63.11516(f)(2). After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with 40 CFR 63.11517(a), "Monitoring Requirements", at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - B. Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as required by 40 CFR 63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."
- v. If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you must comply with 40 CFR 63.11516(f)(5)(i) through (iv).
- A. Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in 40 CFR 63.11517(c), "Monitoring requirements", at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - B. In lieu of the requirement of 40 CFR 63.11516(f)(3) to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with 40 CFR 63.11517(d), "Monitoring Requirements", using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - C. You must keep a record of each visual determination of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5)(i) or (ii), along with any subsequent corrective action taken, in accordance with the requirements in 40 CFR 63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."
 - D. You must report the results of all visual determinations of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5)(i) or (ii), along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by 40 CFR

63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."

- vi. For each visual determination of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5) for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, you must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 40 CFR 63.11516(f)(2).
- vii. For each visual determination of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5) for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in 40 CFR 63.11516(f)(7)(i) through (v).
 - A. You must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in 40 CFR 63.11519(b)(8), "Notification, recordkeeping, and reporting requirements," and according to the requirements of 40 CFR 63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
 - B. Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in 40 CFR 63.11516(f)(8). If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
 - C. During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in 40 CFR 63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - D. You must maintain records of daily visual determinations of emissions opacity performed in accordance with 40 CFR 63.11516(f)(7)(iii), during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in 40 CFR 63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."
 - E. You must include these records in your annual certification and compliance report, according to the requirements of 40 CFR 63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

- viii. The Site-Specific Welding Emissions Management Plan must comply with the requirements in 40 CFR 63.11516(f)(8)(i) through (iii).
 - A. Site-Specific Welding Emissions Management Plan must contain the information in 40 CFR 63.11516(f)(8)(i)(A) through (F).
 - I. Company name and address;
 - II. A list and description of all welding operations which currently comprise the welding affected source;
 - III. A description of all management practices and/or fume control methods in place at the time of the opacity exceedence;
 - IV. A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - V. A description of additional management practices and/or fume control methods to be implemented pursuant to 40 CFR 63.11516(f)(7)(ii), and the projected date of implementation; and
 - VI. Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to 40 CFR 63.11516(f)(8)(i)(D) and (E).
 - B. The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by 40 CFR 63.11516(f)(8)(i)(A) through (C), and submitted with your annual certification and compliance report, according to the requirements of 40 CFR 63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
 - C. You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in 40 CFR 63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."
- b. Pursuant to 40 CFR 63.11523, the provisions in 40 CFR Part 63, Subpart A, applicable to sources subject to 40 CFR 63.11514(a) are specified in Table 2 of 40 CFR 63 Subpart XXXXXX (see Attachment C).
- 10a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities

which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All areas treated shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.

- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 11a. Pursuant to 35 Ill. Adm. Code 218.219(b), except as provided in 35 Ill. Adm. Code 218.219(c), every owner or operator of a coating line described in 35 Ill. Adm. Code 218.204(q) shall:

- i. Store all VOM-containing coatings, thinners, coating-related waste materials, cleaning materials, and used shop towels in closed containers;
- ii. Ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials;
- iii. Minimize spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials;
- iv. Convey VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes;
- v. Minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers; and
- vi. Apply all coatings using one or more of the following application methods:
 - A. Electrostatic spray;
 - B. High volume low pressure (HVLP) spray;
 - C. Flow coating. For the purposes of 35 Ill. Adm. Code 218.219(b)(6)(C), flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
 - D. Roll coating;
 - E. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 218.219(b)(6)(E), electrodeposition means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
 - F. Airless spray;
 - G. Air-assisted airless spray; or
 - H. Another coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.

- b. Pursuant to 35 Ill. Adm. Code 218.219(c)(2), notwithstanding 35 Ill. Adm. Code 218.219(b), the application method limitations in 35 Ill. Adm. Code 218.219(b)(6) shall not apply to for metal parts and products coating operations: touch-up coatings, repair coatings, textured finishes, stencil coatings, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating;
- 12a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The regenerative thermal oxidizer shall be in operation at all times when the associated coating lines are in operation and emitting air contaminants.
 - c. The regenerative thermal oxidizer combustion chamber shall be preheated to the temperature at which compliance was demonstrated during the most recent performance test or to at least the manufacturer's recommended temperature of 1,400°F in the absence of a compliance test. This temperature shall be maintained during operation of the associated coating lines.
 - d. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the regenerative thermal oxidizer and the paint spray booth filters such that the regenerative thermal oxidizer and the paint spray booth filters are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
 - e. The regenerative thermal oxidizer shall only be operated with natural gas as the fuel. The use of any other fuel in the regenerative thermal oxidizer requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- 13a. Emissions of volatile organic material (VOM) and operation of the listed equipment shall not exceed the following limits:
- i. Units Constructed prior to June 15, 2005:

<u>Equipment</u>	<u>Material</u>	<u>Material Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
		<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Content</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
				<u>(% Wt.)</u>		
Hydro-Soluble Paint Spray Booth Line #1 Controlled by RTO	Coating	35.9	359.0	6.0	0.73	7.22

<u>Equipment</u>	<u>Material</u>	Material Usage		VOM	VOM Emissions	
		<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Content</u> <u>(% Wt.)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Cataphoresis Painting Dip Tanks line #1	Coating	7.0	70.0	2.0	0.14	1.40
	Paste	4.9	49.0	14.0	0.69	6.86
Hydro-Soluble Degreasing Sprinkler	Solvent	0.84	8.34	10.0	0.09	0.84
Cataphoresis Degreasing Dip Tank	Solvent	0.84	8.34	10.0	0.09	0.84
Hand Cleaning Line #1	Solvent	0.45	4.50	100.0	0.45	4.50
Totals:					2.19	21.66

ii. Units Constructed after June 15, 2005:

<u>Equipment</u>	<u>Material</u>	Material Usage		VOM	VOM Emissions	
		<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Content</u> <u>(% Wt.)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Hydro-Soluble Paint Line #2	Coating	54.0	540.0	6.0	3.24	32.40
Cataphoresis Painting Dip Tanks Line #2	Coating	12.3	123.0	2.0	0.25	2.46
	Paste	12.2	122	14.0	1.71	17.08
Hand Cleaning Line #2	Solvent	0.49	4.90	100.0	0.49	4.90
Totals:					5.69	56.84

iii. These limits define the actual emissions of VOM and are based on maximum material usage and maximum VOM content. Hydro-Soluble Paint Spray Booth Line #1 limit is further based on Capture efficiency of 70%, control efficiency of RTO of 95% for overall efficiency of 66.5%.

iv. The above limitations contain revisions to previously issued Permits 00120006, 02080044, 05020029 and 08020044. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these aforementioned permits. The source has requested these revisions and has addressed the applicability and compliance of Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in these permits 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. Specifically, the material usage limits have been increased, while the control efficiency of the RTO assures that the permitted VOM emissions of the emission units constructed prior to June 15, 2005 will be increased from a total of 21.6 tons/year to 21.66 tons/year.

- b. Emissions and operation of all the fuel combustion sources (including the RTO) shall not exceed the following limits:

Material	(mmscf/Mo)	(mmscf/Yr)	Pollutant	Emission	Emissions	
				Factor (Lb/mmscf)	(Ton/Mo)	(Ton/Yr)
Natural Gas	25	248	CO	84	1.05	10.42
			NO _x	100	1.25	12.40
			PM	7.6	0.10	0.94
			SO ₂	0.6	0.01	0.01
			VOM	5.5	0.07	0.68

These are the emission factors for uncontrolled natural gas combustion in small boilers with less than 100 mmBtu/hour of heat input, (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, March 1998).

- c. This permit is issued based on negligible emissions of volatile organic material from the hydro-soluble pasivator/demineralization sprinkler, metal bending, and welding. For this purpose emissions from each emission source shall not exceed nominal emission rates of 0.25 lb/hour and 0.44 tons/year.
- d. Emissions of particulate matter from hydro-soluble pasivator demineralization sprinkler and hydro-soluble paint spray booths from each emission source shall not exceed 0.55 lb/hour and 0.5 tons/year. This limit is based on the allowable emission rate from 35 Ill. Adm. Code 212.321.
- e. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm.
- f. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 14a. Pursuant to 35 Ill. Adm. Code 212.282, every emission source or air pollution control equipment shall be subject to the following testing

requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
 - b. Testing required by Condition 15 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
15. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
- 16a. Pursuant to 40 CFR 63.11517(a), visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.
- b. Pursuant to 40 CFR 63.11517(b), visual determinations of fugitive emissions must be performed in accordance with 40 CFR 63.11517(a) and according to the schedule in 40 CFR 63.11517(b)(1) through (4).

- i. Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
 - ii. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with 40 CFR 63.11517(b)(1) for 10 days of work day operation of the process, you may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with 40 CFR 63.11517(b)(1).
 - iii. If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with 40 CFR 63.11517(b)(2), you may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly EPA Method 22 in accordance with 40 CFR 63.11517(b)(2).
 - iv. If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with 40 CFR 63.11517(b)(3), you may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly EPA Method 22 in accordance with 40 CFR 63.11517(b)(3).
- c. Pursuant to 40 CFR 63.11517(c), visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR Part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.
- d. Pursuant to 40 CFR 63.11517(d), you must perform visual determination of emissions opacity in accordance with Pursuant to 40 CFR 63.11517(c) and according to the schedule in 40 CFR 63.11517(d)(1) through (5).
- i. Perform visual determination of emissions opacity once per day during each day that the process is in operation.
 - ii. If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with 40 CFR 63.11517(d)(1) does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of 40 CFR 63.11517(d)(1).

- iii. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with 40 CFR 63.11517(d)(2) does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of 40 CFR 63.11517(d)(2).
 - iv. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with 40 CFR 63.11517(d)(3) does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of 40 CFR 63.11517(d)(3).
 - v. If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with 40 CFR 63.11517(d)(3) does not exceed 20 percent, you may resume EPA Method 22 testing as in 40 CFR 63.11517(b)(3) and (4). In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with 40 CFR 63.11517(d)(3) and (4).
- 17a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
- b. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or $\pm 0.5^{\circ}\text{C}$, whichever is greater.
18. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not

subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 19a. Pursuant to 40 CFR 63.11519(c), you must collect and keep records of the data and information specified in 40 CFR 63.11519(c)(1) through (13), according to the requirements in 40 CFR 63.11519(c)(14).
 - i. Maintain information specified in 40 CFR 63.11519(c)(1)(i) through (ii) for each affected source.
 - A. Each notification and report that you submitted to comply with 40 CFR 63 Subpart XXXXXX, and the documentation supporting each notification and report.
 - B. Records of the applicability determinations as in 40 CFR 63.11514(b)(1) through (5), "Am I subject to this subpart", listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.
 - ii. Maintain a record of the information specified in 40 CFR 63.11519(c)(2)(i) through (iii) for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a), "Monitoring requirements".
 - A. The date and results of every visual determination of fugitive emissions;
 - B. A description of any corrective action taken subsequent to the test; and

- C. The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- iii. Maintain a record of the information specified in 40 CFR 63.11519(c)(3)(i) through (iii) for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c), "Monitoring requirements".
 - A. The date of every visual determination of emissions opacity; and
 - B. The average of the six-minute opacities measured by the test; and
 - C. A description of any corrective action taken subsequent to the test.
- iv. You must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with 40 CFR 63.11516(f)(7)(iii), "Requirements for opacities exceeding 20 percent".
- v. If you have been required to prepare a plan in accordance with 40 CFR 63.11516(f)(7)(iii), "Site-Specific Welding Emissions Management Plan," you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.
- vi. If you comply with 40 CFR 63 Subpart XXXXXX by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review.
- vii. If you operate a new or existing welding affected source which is not required to comply with the requirements of 40 CFR 63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), you must maintain records demonstrating your welding rod usage on a rolling 12-month basis.
- viii. Your records must be maintained according to the requirements in 40 CFR 63.11519(c)(14)(i) through (iii).
 - A. Your records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1), "General Provisions." Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

- B. As specified in 40 CFR 63.10(b)(1), "General Provisions", you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
 - C. You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to 40 CFR 63.10(b)(1), "General Provisions". You may keep the records off-site for the remaining 3 years
- 20a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187, because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2):
- i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;
 - ii. The VOM content of each cleaning solution as applied in each cleaning operation;
 - iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and
 - iv. The total monthly VOM emissions from cleaning operations at the source.
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by this 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- c. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating as applied on each coating line;
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;

- iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line, and certified product data sheets for each coating.
- d. Pursuant to 35 Ill. Adm. Code 218.211(e)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (l), (m), or (n) shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
 - i. Control device monitoring data.
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line.
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- e. Pursuant to 35 Ill. Adm. Code 218.211(h)(2), on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.219 shall comply with the following: Maintain at the source all records required by 35 Ill. Adm. Code 218.211(h) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- 21a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit:
 - i. Records addressing use of good operating practices for the regenerative thermal oxidizer and the paint spray booth filters:
 - A. Records for periodic inspection of the regenerative thermal oxidizer and the paint spray booth filters with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

- ii. Amount of each coating, paste and cleaning solvent used (tons/month and tons/year);
 - iii. VOM and HAP content of each coating, paste, and cleaning solvent used (% weight);
 - iv. VOM and HAP content (minus water and any other compounds which are specifically exempted from the definition of VOM) of each coating used (lbs/gallon) as applied each day on each coating line and certified product data for each coating;
 - v. Natural gas consumption (mmscf/month and mmscf/year);
 - vi. Monthly and annual VOM and HAP emissions for units constructed prior to June 15, 2005 with supporting calculations (tons/month and tons/year); and
 - vii. Monthly and annual CO, NO_x, PM, SO₂, VOM and HAP emissions from the source with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 22a. Pursuant to 40 CFR 63.11519(b)(1), you must prepare and submit annual certification and compliance reports for each affected source according to the requirements of 40 CFR 63.11519(b)(2) through (7). The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in 40 CFR 63.11519(b)(3).
- b. Pursuant to 40 CFR 63.11519(b)(2), unless the Illinois EPA or USEPA has approved or agreed to a different schedule for submission of reports under 40 CFR 63.10(a), "General Provisions", you must prepare and submit each annual certification and compliance report according to the dates specified in 40 CFR 63.11519(b)(2)(i) through (iii). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- i. The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.

- ii. Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.
 - iii. Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.
- c. Pursuant to 40 CFR 63.11519(b)(4), the annual certification and compliance report must contain the information specified in 40 CFR 63.11519(b)(4)(i) through (iii), and the information specified in 40 CFR 63.11519(b)(5) through (7) that is applicable to each affected source.
- i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
 - iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- d. Pursuant to 40 CFR 63.11519(b)(5), the annual certification and compliance report must contain the information specified in 40 CFR 63.11519(b)(5)(i) through (iii) for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a), "Monitoring requirements".
- i. The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
 - ii. A description of the corrective actions taken subsequent to the test; and
 - iii. The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
- e. Pursuant to 40 CFR 63.11519(b)(6), the annual certification and compliance report must contain the information specified in 40 CFR 63.11519(b)(6)(i) through (iii) for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c), "Monitoring requirements".
- i. The date of every visual determination of emissions opacity;
 - ii. The average of the six-minute opacities measured by the test; and

- iii. A description of any corrective action taken subsequent to the test.
- f. Pursuant to 40 CFR 63.11519(b)(8), as required by 40 CFR 63.11516(f)(7)(i), "Requirements for opacities exceeding 20 percent", you must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in 40 CFR 63.11519(b)(1), and must contain the information in 40 CFR 63.11519(b)(8)(iii)(A) and (B).
 - i. The date on which the exceedence occurred; and
 - ii. The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- g. Pursuant to 40 CFR 63.11519(b)(9), you must submit a copy of the records of daily visual determinations of emissions recorded in accordance with 40 CFR 63.11516(f)(7)(iv), "Tier 3 requirements for opacities exceeding 20 percent", and a copy of your Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to 40 CFR 63.11516(f)(8), "Site-specific Welding Emission Management Plan", along with your annual certification and compliance report, according to the requirements in 40 CFR 63.11519(b)(1).
- 22a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.211(c), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. 218.204 shall comply with the following:
 - i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from 35 Ill. Adm. Code 218.205, 35 Ill. Adm. Code 218.207, 35 Ill. Adm. Code 218.215, or 35 Ill. Adm. Code 218.216 to 35 Ill. Adm. Code 218.204; the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 218.204 on and after a date

consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date. The certification shall include:

- A. The name and identification number of each coating as applied on each coating line;
 - B. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;
 - C. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line.
- ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
- A. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - B. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), as applicable.
- c. Pursuant to 35 Ill. Adm. Code 218.211(e), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (l), (m), or (n) shall comply with the following:
- i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance for an existing coating line from 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205 to 35 Ill. Adm. Code 218.207, the owner or operator of the subject coating line shall perform all tests and submit to the Illinois EPA the results of all tests and calculations necessary to demonstrate that the subject coating line will be in compliance with 35 Ill. Adm. Code 218.207 on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date.

- ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 Ill. Adm. Code 218.207 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code Part 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code Part 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(c) or (d), respectively.
 - d. Pursuant to 35 Ill. Adm. Code 218.211(h)(2), on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.219 shall comply with the following: Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.219 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation.
 - e. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 23a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:
 - Illinois Environmental Protection Agency
 - Division of Air Pollution Control
 - Compliance Section (#40)
 - P.O. Box 19276
 - Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

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

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

Date Signed: _____

REP:DWH:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the fabricated metal products manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons per year for any combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	<u>E M I S S I O N S (Tons/Year)</u>						
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>	<u>Single HAP</u>	<u>Combined HAPs</u>
Hydro-Soluble Paint Spray Booth Line #1			0.50		7.22		
Cataphoresis Painting Dip Tanks Line #1					8.26		
Hydro-Soluble Degreasing Sprinkler					0.84		
Cataphoresis Degreasing Dip Tank					0.84		
Hand cleaning line #1					4.50		
Hydro-Soluble Paint Line #2			0.50		32.40		
Cataphoresis Painting Dip Tanks Line #2					19.54		
Hand Cleaning Line #2					4.90		
Hydro-Soluble Pasivator/ Demineralization Sprinkler			0.50		0.44		
Metal Bending					0.44		
Welding					0.44		
Combustion of Natural Gas	10.42	12.40	0.94	0.01	0.68	----	----
Totals:	10.42	12.40	2.44	0.01	80.50	7.9	19.9

Attachment B - Emissions Reduction Market System (ERMS)

1. Description of ERMS

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

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

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

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

2. Applicability

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

3. Obligation to Hold Allotment Trading Units (ATUs)

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

4. Market Transactions

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

5. Emissions Excursion Compensation

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

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

be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6. Quantification of Seasonal VOM Emissions

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

No exceptions

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

7. Annual Account Reporting

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

- v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 Ill. Adm. Code 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 Ill. Adm. Code 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 Ill. Adm. Code 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.
8. Allotment of ATUs to the Source
- a.
 - i. The allotment of ATUs to this source is 0 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 0 tons per season.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 Ill. Adm. Code 205.405, including units complying with MACT or using BAT, as identified in Condition 10 of this Attachment of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 3(a) of this Attachment becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
 - b. Contingent Allotments for New or Modified Emission Units
- None

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

9. Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as recorded and as required by Condition 21(a)(vii) of this permit and Condition 6(a) of this Attachment; and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

10. Exclusions from Further Reductions

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

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because

they meet the criteria as indicated above [35 Ill. Adm. Code 205.405(a) and (c)]:

Fuel Combustion Emission Units

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

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

None

Attachment C - Table 2 to Subpart XXXXXX of Part 63-Applicability of General Provisions to Metal Fabrication or Finishing Area Sources

Instructions for Table 2-As required in 40 CFR 63.11523, "General Provisions Requirements", you must meet each requirement in the following table that applies to you

Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.5	Construction/reconstruction.
63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), (g), (i), (j)	Compliance with standards and maintenance requirements.
63.9(a)-(d)	Notification requirements.
63.10(a), (b) except for (b)(2), (d)(1), (d)(4)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.
63.16	Performance track provisions.

¹ §63.11514(g), "Am I subject to this subpart?" exempts affected sources from the obligation to obtain title V operating permits.