217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NESHAP SOURCE

PERMITTEE

Komatsu America Corp.
Attn: Richard C. Dawson
2300 N.E. Adams Street
Peoria, Illinois 61639

Application No.: 95120081 I.D. No.: 143065API
Applicant's Designation: Date Received: November 1, 2007
Subject: Manufacturing of Off Road Construction Machinery
Date Issued: Expiration Date:
Location: 2300 N.E. Adams Street, Peoria, Peoria County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a coating operation (comprised of paint booth-plant #1, paint booth-building EE, paint booth-building AA), two (2) diesel engine test cells, 4,000 gallon gasoline storage tank, three (3) natural gas-fired boilers (each 4.8 mmBtu/hour or less), space heaters and heat treat ovens, and three (3) Shot Blast Units 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 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.

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.

2. The 4,000 gallon gasoline storage tank is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities, 40 CFR 63, Subparts A and CCCCCC. The Illinois EPA is administrating the NESHAP on behalf of USEPA under a delegation agreement.

3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.

b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such

opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from

the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

d. Pursuant to 35 Ill. Adm. Code 212.321(a), 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, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

5a. Pursuant to 35 Ill. Adm. Code 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 215.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 215.121(b)(2).

b. Pursuant to 35 Ill. Adm. Code 215.204(k)(2), no owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to 35 Ill. Adm. Code Part 215, delivered to the coating applicator:

Heavy Off-Highway Vehicle Products	kg/l	lb/gal
In the remaining counties		
Extreme performance prime coat	0.42	(3.5)
Extreme performance top coat-air dried	0.52	(4.3)
Final repair coat - air dried	0.58	(4.8)

c. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.

6. This permit is issued based on the engine test cells not being subject to the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60 Subpart IIII. Pursuant to 40 CFR 60.4200(b), the provisions of 40 CFR 60

Subpart IIII are not applicable to stationary CI ICE being tested at a stationary CI ICE test cell/stand.

7a. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM. This is a result of the federally enforceable production and operating limitations, which were established in permit 06090083 to restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

b. This permit is issued based on the engine test cells not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subpart ZZZZ. Pursuant to 40 CFR 63.6585, you are subject to 40 CFR 63 Subpart ZZZZ if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

c. This permit is issued based on the engine test cells not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants for Engine Test Cells/Stands, 40 CFR 63 Subpart PPPPP because this source is not a major source of Hazardous Air Pollutant (HAP) emissions.

d. 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 Paint Stripping And Miscellaneous Surface Coating Operations At Area Sources, 40 CFR 63 Subpart HHHHHH. Pursuant to 40 CFR 63.11170(a)(3), you are subject to 40 CFR 63 Subpart HHHHHH if you operate an area source of HAP as defined in 40 CFR 63.11170(b), including sources that are part of a tribal, local, State, or Federal facility and you perform spray application of coatings that contain the target HAP, as defined in 40 CFR 63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in 40 CFR 63.11180.

8a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

b. Pursuant to 35 Ill. Adm. Code 212.681(c), 35 Ill. Adm. Code 212.321 and 212.322 of this Part shall not apply to sandblasting or shotblasting, which shall be subject to 35 Ill. Adm. Code 212 Subpart K.

9a. Pursuant to 35 Ill. Adm. Code 215.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 215.122 shall only apply to the loading

of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).

b. Pursuant to 35 Ill. Adm. Code 215.206(b), the limitations of 35 Ill. Adm. Code 215 Subpart F shall not apply to touch-up and repair coatings used by a coating source described in 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j); provided that the source-wide volume of such coatings does not exceed 0.95 l (1 quart) per eight-hour period or exceed 209 l/year (55 gallons/year) for any rolling twelve-month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with 35 Ill. Adm. Code 215.206(c).

c. Pursuant to 35 Ill. Adm. Code 215.206(d), "touch-up and repair coatings" means, for purposes of 35 Ill. Adm. Code 215.206, any coating used to cover minor scratches and nicks that occur during manufacturing and assembly processes.

d. Pursuant to 35 Ill. Adm. Code 215.209, no coating line subject to the limitations of 35 Ill. Adm. Code 215.204 is required to meet 35 Ill. Adm. Code 215.301 or 215.302 after the date by which the coating line is required to meet 35 Ill. Adm. Code 215.204.

10. This permit is issued based on the engine test cells not being subject to 35 Ill. Adm. Code 217 Subpart Q, Stationary Reciprocating Internal Combustion Engines and Turbines. Pursuant to 35 Ill. Adm. Code 217.386(b)(2), an affected unit is not subject to the requirements of this Subpart Q if the engine or turbine is or has been used for research or for the purposes of performance verification or testing.

11a. Pursuant to 40 CFR 63.6(e)(1)(i), at all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in 40 CFR 63.6(e)(3)), review of operation and maintenance records, and inspection of the source.

b. Pursuant to 40 CFR 63.6(e)(1)(ii), malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a startup, shutdown, or malfunction, an owner or operator must comply by minimizing emissions during such a

startup, shutdown, and malfunction event consistent with safety and good air pollution control practices.

12a. Pursuant to 40 CFR 63.11116(a), the Permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

i. Minimize gasoline spills;

ii. Clean up spills as expeditiously as practicable;

iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasket seal when not in use; and

iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

b. Pursuant to 40 CFR 63.11116(c), you must comply with the requirements of 40 CFR 63 Subpart CCCCCC by the applicable dates specified in 40 CFR 63.11113.

13a. 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 paved areas 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.

14a. Pursuant to 35 Ill. Adm. Code 215.583(a), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless:

i. The tank is equipped with a submerged loading pipe; and

ii. The vapors displaced from the storage tank during filling are processed by a vapor control system that includes one or more of the following:

A. A vapor collection system that meets the requirements of 35 Ill. Adm. Code 215.583(d)(4); or

B. A refrigeration-condensation system or any other system approved by the Illinois EPA that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled; and

C. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 Ill. Adm. Code 215.584(b) or (d).

b. Pursuant to 35 Ill. Adm. Code 215.583(c), each owner of a gasoline dispensing facility shall:

i. Install all control systems and make all process modifications required by 35 Ill. Adm. Code 215.583(a);

ii. Provide instructions to the operator of the gasoline dispensing facility describing necessary maintenance operations and procedures for prompt notification of the owner in the case of any malfunction of a vapor control system; and

iii. Repair, replace or modify any worn out or malfunctioning component or element of design.

c. Pursuant to 35 Ill. Adm. Code 215.583(d), subject to 35 Ill. Adm. Code 215.583(b), each operator of a gasoline dispensing facility and each delivery vessel operator shall:

i. Maintain and operate each vapor control system in accordance with the owner's instructions;

ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system;

iii. Maintain gauges, meters or other specified testing devices in proper working order;

iv. Operate the vapor collection system and delivery vessel unloading points in a manner that prevents:

A. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B, and

B. Avoidable leaks of liquid during the filling of storage tanks.

15a. 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. Gasoline shall be the only material stored in the 4,000 gallon storage tank. The storage of any other material in the tank may require that the Permittee first obtain a construction permit from the Illinois EPA and then verify compliance with all applicable requirements.

c. The boilers and heat treat ovens shall only be operated with natural gas as the fuel. The use of any other fuel in the boilers or heat treat ovens requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

d. The engine test cells s shall only be operated with distillate fuel oil as the fuel. The use of any other fuel in the engine test cells 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.

e. The Permittee shall not keep, store or use distillate fuel oil (Grades No. 1 and 2) at this source with a sulfur content greater than the larger of the following two values:

i. 0.28 weight percent, or

ii. The Wt percent given by the formula: Maximum Wt percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).

f. Organic liquid by-products or waste materials shall not be used in any emission unit at this source without written approval from the Illinois EPA.

g. The Illinois EPA shall be allowed to sample all fuels stored at the above location.

16a. Emissions and operation of the coating operations shall not exceed the following limits:

Material	VOM Usage (Ton/Mo)	VOM Usage (Ton/Yr)	VOM Emissions (Ton/Mo)	VOM Emissions (Ton/Yr)
Coatings & Solvents	5.0	50.0	5.0	50.0

These limits are based on the maximum material usage and material balance. VOM and HAP emissions shall be determined from the use of the following equation:

$$E = \Sigma \ (R_i \times d_i \times C_i)$$

Where:

E = VOM or HAP emissions (lbs);

R_i = Coating material usage including coatings, inks and solvents (gallons);

d_i = Density of coating materials (lb/gallon); and

C_i = VOM or HAP content of the coating materials (lbs/gallon).

b. Operation and emissions of the natural gas-fired combustion units shall not exceed

i. Natural gas usage: 33 mmscf/month and 264 mmscf/year

ii. Emissions from the combustion of natural gas:

Pollutant	Emission Factor (lbs/mmscf)	Emissions (Tons/Month)	Emissions (Tons/Year)
Carbon Monoxide (CO)	84.0	1.39	11.09
Nitrogen Oxides (NO_x)	100.0	1.65	13.20
Particulate Matter (PM)	7.6	0.13	1.00
Sulfur Dioxide (SO_2)	0.6	0.01	0.08
Volatile Organic Material (VOM)	5.5	0.10	0.73

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

c. Total usage of distillate fuel oil for large engines in the engine test cells (generators and other engines with a capacity greater than 600 horsepower each) shall not exceed 6,800 gallons per month and 68,000 gallons per year and emissions shall not exceed the following limits:

Pollutant	Emission Rate (lb/mmBtu)	Emissions (Tons/Month)	Emissions (Tons/Year)
CO	0.85	0.41	4.05
NO_x	3.20	1.53	15.23

PM	0.0697	0.04	0.33
SO_2	0.2828	0.14	1.35
VOM	0.09	0.05	0.43

These limits are based on standard emission factors (Table 3.4-1, AP-42, Volume I, Fifth Edition, Supplement B, October 1996) for large stationary diesel engines, a conversion factor of 140,000 Btu/gallon of distillate oil, and the maximum monthly and annual distillate fuel oil usage for the engines.

d. Total usage of distillate fuel oil for the small engines in the engine test cells (with a capacity of 600 horsepower each or smaller) shall not exceed 6,800 gallons per month and 68,000 gallons per year and emissions shall not exceed the following limits:

	Emission Rate	Emissions	
Pollutant	(lb/mmBtu)	(Tons/Month)	(Tons/Year)
CO	0.95	0.46	4.52
NO_x	4.41	2.10	20.99
PM	0.31	0.15	1.48
SO_2	0.29	1.40	1.38
VOM	0.36	0.18	1.71

These limits are based on standard emission factors (Table 3.3-1, AP-42, Volume I, Fifth Edition, Supplement B, October 1996) for Diesel Industrial Engines, a conversion factor of 140,000 Btu/gallon of distillate oil, and the maximum monthly and annual distillate fuel oil usage for the engines.

e. The throughput of gasoline through the gasoline storage tank shall not exceed 19,125 gallons/month and 153,000 gallons/year and VOM emissions shall not exceed the following limits:

	VOM Emissions	
(lb/1,000 Gallon)	(lb/Month)	(Ton/Year)
13.0	249	1.00

These limits are based on the maximum gasoline throughput of the storage tank and gasoline dispensing operation and standard emission factors (Table 5.2-7, AP-42, Volume I, Fifth Edition, December 1995. The overall emission factor of 13.0 lbs VOM/1,000 gallon of gasoline throughput is the sum of the emission factors for balanced submerged filling of underground tank (Stage I) (0.3 lbs/1,000 gallon), underground tank breathing and emptying (1.0 lbs/1,000 gallon), vehicle filling displacement losses (uncontrolled) (1.1 lbs/1,000 gallon), and vehicle filling spillage (0.7 lbs/1,000 gallon).

f. This permit is issued based on negligible emissions of PM from the 3 shot blast units. For this purpose, emissions from each unit shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.

g. This permit is issued based on the source not being a major source of HAP emissions for purposes of 40 CFR 63 Subpart MMMM, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, as a result of the emission limitations and operating restrictions first established in permit 06090083. Accordingly, the control requirements of this NESHAP

for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM, would not apply to the surface coating operations at the source.

i. The total volume of organic HAPs contained in HAP containing materials used in coating operations at the source shall not exceed 2.0 tons per month and 20 tons per year.

ii. The total volume of any individual organic HAP contained in HAP containing materials used in coating operations at the source shall not exceed 0.8 tons per month and 8 tons per year.

iii. Emissions of HAPs from the affected coating lines shall not exceed 0.8 tons and 2.0 tons per month and 8.0 tons and 20.0 tons per year, for each individual HAP and total HAPs, respectively.

iv. Emissions of HAPs from other emission units at the source (e.g., natural gas space heaters, gasoline storage tank, etc.) shall not exceed 0.50 tons/year for any single HAP and for the combination of any such HAPs, from all other emission units combined.

v. As a result of the above limits, this permit is also issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

h. 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).

17a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding,

but excluding instruments and sensing devices, as may be necessary.

b. Testing required by Conditions 17 and 18 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

18 Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.

19a. Pursuant to 35 Ill. Adm. Code 215.208(a), the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A. Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative.

b. Pursuant to 35 Ill. Adm. Code 215.208(b), transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA.

c. Pursuant to 35 Ill. Adm. Code 215.583(d)(5), within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of 35 Ill. Adm. Code 215.583(d)(4)(A).

20a. Pursuant to 40 CFR 63.7(g)(3), for a minimum of 5 years after a performance test is conducted, the owner or operator shall retain and make available, upon request, for inspection by the Illinois EPA or USEPA the records or results of such performance test and other data needed to determine emissions from an affected source.

b. Pursuant to 40 CFR 63.10(b)(1), the owner or operator of an affected source subject to the provisions of 40 CFR Part 63 shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement,

maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

c. Pursuant to 40 CFR 63.10(b)(2), the owner or operator of an affected source subject to the provisions of 40 CFR Part 63 shall maintain relevant records for such source of:

   i. The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards;

   ii. The occurrence and duration of each malfunction of operation (i.e., process equipment) or the required air pollution control and monitoring equipment;

   iii. All required maintenance performed on the air pollution control and monitoring equipment;

   iv. All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.

d. 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.

21. Pursuant to 40 CFR 63.11116(b), you are not required to submit notifications or reports, but you must have records available within 24

hours of a request by the Illinois EPA or USEPA to document your gasoline throughput.

22. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

23a. Pursuant to 35 Ill. Adm. Code 215.206(c), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall:

i. Collect and record the name, identification number, and volume of each touch-up and repair coating, as applied on each coating line, per eight-hour period and per month;

ii. Perform calculations on a daily basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for each eight-hour period;

iii. Perform calculations on a monthly basis, and maintain at the source, records of such calculations of the combined volume of touch-up and repair coatings used source-wide for the month and the rolling twelve-month period;

iv. Prepare and maintain at the source an annual summary of the information required to be compiled pursuant to 35 Ill. Adm. Code 215.206(b) on or before January 31 of the following year;

v. Maintain at the source for a minimum of three years all records required to be kept under this subsection (c) and make such records available to the Illinois EPA upon request.

24a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit:

i. Coating usage (gallons/month and gallons/year);

ii. Solvent usage (gallons/month and gallons/year);

iii. The name and identification number of each coating;

iv. VOM and HAP contents of coating materials used (percent by weight);

v. The densities of coating materials used (lbs/gallon);

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

vii. Monthly and annual VOM emissions from the coating booths with supporting calculations (tons/month and tons/year);

viii. Distillate fuel oil usage in the engine test cells for engines 600 horsepower each or smaller (gallons/month and gallons/year);

ix. Distillate fuel oil usage in the engine test cells for engines greater than 600 horsepower (gallons/month and gallons/year);

x. The sulfur content of the distillate fuel oil used in the engine test cells (% by wt), this shall be recorded for each shipment of oil delivered to the source;

xi. The throughput of the gasoline storage tank (gallons/month and gallons/year)

xii. Monthly and annual emissions of CO, NO_x, PM, SO_2, VOM and HAPs from the source with supporting calculations (tons/month and tons/year).

b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

24a. Pursuant to 40 CFR 63.7(b)(1), the owner or operator of an affected source must notify the Illinois EPA or USEPA in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow the Illinois EPA or USEPA, upon request, to review and approve the site-specific test plan required under 40 CFR 63.7(c) and to have an observer present during the test.

b. Pursuant to 40 CFR 63.7(b)(2), in the event the owner or operator is unable to conduct the performance test on the date specified in the notification requirement specified in 40 CFR 63.7(b)(1) due to unforeseeable circumstances beyond his or her control, the owner or operator must notify the Illinois EPA or USEPA as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the owner or operator of legal responsibility for compliance with any other applicable provisions of 40 CFR Part 63 or with any other applicable Federal, State, or local requirement, nor will it prevent the Illinois EPA or USEPA from implementing or enforcing 40 CFR Part 63 or taking any other action under the Clean Air Act.

c. Pursuant to 40 CFR 63.10(d)(1), notwithstanding the requirements in this paragraph or 40 CFR 63.10(e), and except as provided in 40 CFR 63.16, the owner or operator of an affected source subject to reporting requirements under 40 CFR Part 63 shall submit reports to the Illinois EPA or USEPA in accordance with the reporting requirements in the relevant standard(s).

25. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the

Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

26. Pursuant to 35 Ill. Adm. Code 215.206(c), the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of 35 Ill. Adm. Code 215.204(b), (d), (f), (g), (i), and (j) because of the provisions of 35 Ill. Adm. Code 215.206(b) shall Notify the Illinois EPA in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 l (1 quart) per eight-hour period or exceeds 209 l/year (55 gallons/year) for any rolling twelve-month period within 30 days after any such exceedence. Such notification shall include a copy of any records of such exceedence.

27a. 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
5415 North University
Peoria, Illinois 61614

It should be noted the oil storage tanks and 1,000 gallon organic liquid storage tank are exempt from a permit pursuant to 35 Ill. Adm. Code 201.146(n)

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

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

ECB:DWH:jws

cc: Illinois EPA, FOS Region 2
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Off Road Construction Machinery Manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAP) 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.

	E M I S S I O N S (Tons/Year)						
Emission Unit	CO	NO_x	PM	SO_2	VOM	Single HAP	Total HAPs
Coating Operations					50.00	8.0	20.0
Natural Gas-Fired Combustion Equipment	11.09	13.20	1.00	0.08	0.73		
Engine Test Cells (greater than 600HP)	4.05	15.23	0.33	1.35	0.43		
Engine Test Cells (small engines)	4.52	20.99	1.48	1.38	1.71		
Gasoline Storage Tank					1.00		
3 Shot Blast Units			1.32				
HAPs from "Other" Emission Units Combined	--	--	--	--	--	0.5	0.5
Totals	19.66	49.42	4.13	2.81	53.87	8.5	20.5