

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

S & C Electric Company
Attn: Robert Sullivan
6601 North Ridge Boulevard
Chicago, Illinois 60626-3904

<u>Application No.:</u> 95110005	<u>I.D. No.:</u> 031600CGP
<u>Applicant's Designation:</u>	<u>Date Received:</u> November 3, 1995
<u>Operation of:</u> Manufacturer of Switchgear and Switchboard Apparatus	
<u>Date Issued:</u> March 3, 2000	<u>Expiration Date²:</u> March 3, 2005
<u>Source Location:</u> 6601 North Ridge Boulevard, Chicago, Cook County, 60626	
<u>Responsible Official:</u> Robert Sullivan, Director, Safety and Environment	

This permit is hereby granted to the above-designated Permittee to OPERATE a facility that manufactures switchgear and switchboard apparatus, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: December 5, 2000
Revision Date Issued:
Purpose of Revision: Minor Modification

This minor modification addresses revisions to the ERMS baseline by incorporate units that have completed seasonal allotment periods.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued March 3, 2000 is incorporated therein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

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

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

DES:JRC:psj

cc: Illinois EPA, FOS, Region 1

USEPA

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

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

S & C Electric Company
6601 North Ridge Boulevard
Chicago, Illinois 60626-3904
773/338-1000

I.D. No.: 031600CGP
Standard Industrial Classification: 3613, Switchgear and
switchboard apparatus

1.2 Owner/Parent Company

S & C Electric Company
6601 North Ridge Boulevard
Chicago, Illinois 60626-3904

1.3 Operator

S & C Electric Company
6601 North Ridge Boulevard
Chicago, Illinois 60626-3904

Contact Person: Robert Sullivan
773/338-1000

1.4 General Source Description

S & C Electric Company is located at 6601 North Ridge Boulevard, Chicago. The source manufactures switchgear and switchboard apparatus. In addition, the primary pollutant at this source is VOM which is produced from many of the multiple manufacturing processes.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

- Wave Solder Machine (OT-0046)
- Metal Flame Spray Cabinet (P-0019)
- Fuse Filling (P-9020)
- Boilers (FC-0027a, FC-0027b, FC-0007, FC-0008, FC-0016, FC-0024, FC-0034, FC-0040C, FC-0040D, FC-0044E, FC-0044F FC-0035, FC-0073)
- Insert Cementing (P-0022)
- Grinding Booths (P-0018, P-0017)
- Chucking Machine (P-0060)
- Grinding Machine (V-0002)
- Silver Brazing/Soldering (OT-0049)
- Welding Operations (V-0001)
- Zinc/Nickel Plating (P-0033)
- Zinc Galvanizing (P-0028)
- Cleaning Line (P-0031)
- Silver and Tin Plating (P-0032)
- Silver Spot Plating (P-0032b)
- Chemical Storage and Destruction (P-0030)
- Parts Finishing (P-0055)
- Sulfur Hexafluoride Venting (V-0004)

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

- Shot-Blaster (P-0051)
- Disk Grinder and Polisher (P-0061)
- Laser Cutter (P-0039)
- New Britain Rod Cutter (V-0006)
- Welder (V-0001)
- Boilers (FC-9401, FC-0010, FC-0036, FC-0037)
- Fuse Tinning (P-0054)
- Metal Deburring (V-0005, P-9501)
- Miscellaneous Grinding (V-0003)
- Panel Pretreatment (P-9041)
- Enclosure Pretreatment (P-9402)
- Epoxy Fuse Filling (V-0008)
- 2-Gallon Mineral Spirits Cold Degreasers (COLD-DGR)
- Silica Storage Silo (V-0009)

Alumina Storage Silo (V-0010)
RC Machine (V-0011)
Hardener Storage Silo (V-0013)
Resin Storage Silo (V-0014)

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

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

Furnaces used for melting metals, other than beryllium, with a brim full capacity of less than 450 cubic inches by volume [35 IAC 201.210(a)(6)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

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

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In

particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
FC-0009	9.8 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None
FC-0011	23.6 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None
FC-0013	23.6 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None
FC-0071	14.3 mmBtu natural gas fired boiler	1997	None
FC-0072	14.3 mmBtu natural gas fired boiler	1997	None
FC-0074	29 mmBtu natural gas fired boiler	1999	None
FC-0075	29 mmBtu natural gas fired boiler	1999	None
PFS	Panel Finishing System	1972	Air Filter Units
EFS	Enclosure Finishing System	1972	Air Filter Unit, Water Wash, and Catalytic Incinerator
P-0020	Abrasive Cleaning Cabinet	1973	Baghouse
P-0038	Tablet Machines	1991	Dust Collector
P-0050	Rotoblaster	1992	Baghouse
P-9011 & P-9012	Fuse Coating and Marking Operation	1992	Filter
P-0021	Resin Mixing, Molding, and Extruding Process	1990	Dripak Filter
P-0052	Adhesive Application	1992	Afterburner

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

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

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source 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 [35 IAC 212.306].

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the

owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

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

5.3 Non-Applicability of Regulations of Concern

Addressed in Section 7 Where applicable

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	92.48
Sulfur Dioxide (SO ₂)	17.12
Particulate Matter (PM)	14.83
Nitrogen Oxides (NO _x)	63.16
HAP, Not Included in VOM or PM	---
TOTAL	187.59

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for

Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

Condition 9.11 does not apply to the temporary removal of emission units and control equipment for such activities as repairs and maintenance.

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 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 CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, 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 during initial issuance of the sources' CAAPP 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 IAC 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 IAC 205.500 and 35 IAC 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 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, 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 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC 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 in Section 7.0 of this permit.

6.4 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 IAC 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 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 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 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, 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 IAC 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.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 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 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 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 IAC 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.

6.7 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 IAC 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 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 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 IAC 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 IAC 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 IAC 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 November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 220 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 23.03 tons.
 - 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 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 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 6.3(a) 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

Not applicable.

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 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

- 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 IAC 205.405(a) and (c)]:

The fuel combustion units listed in Condition 3.1, 4.0, 7.1, 7.2, and 7.3

- 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 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 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 IAC 205.405(b) and (c)]:

Enclosure Finishing System (EFS)
Panel Finishing System (PFS)

7.0 UNIT SPECIFIC CONDITIONS

7.1 Boilers 3, 6B, 6A

7.1.1 Description

The boiler's firing rates are 9.8 mmBtu/hr (FC-0009), 23.6 mmBtu/hr (FC-0011), and 23.6 mmBtu/hr (FC-0013). The boilers are natural gas fired with distillate fuel oil backup used primarily to provide space heat and to provide hot water and steam to processing needs.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
FC-0009	9.8 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None
FC-0011	23.6 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None
FC-0013	23.6 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit-specific conditions, is a fuel combustion emission unit as described in Conditions 7.1.1 and 7.1.2.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 10 mmBtu/hr to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- c. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lb/mmBtu) [35 IAC 212.206].
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any existing fuel combustion emission source, burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when

distillate fuel oil is burned (0.30 lb/mmBtu) [35 IAC 214.161(b)].

- e. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to the requirements of the NSPS for Small Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because construction, modification, or reconstruction was commenced before June 9, 1989.
- b. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 218.303].
- c. The control requirements of 35 IAC 218 Subpart TT shall not apply to fuel combustion units [35 IAC 218.980(f)].

7.1.5 Operational and Production Limits and Work Practices

- a. Natural gas and distillate fuel oil shall be the only fuels fired in the affected boilers.
- b. The sulfur content of the distillate fuel oil used by the affected boilers shall not exceed 0.28 wt.%.

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source-wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with

Conditions 5.5.1 and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas fuel usage for the affected boilers, scf/yr.
- b. Distillate fuel usage for the affected boilers, gal/yr.
- c. Sulfur content of the distillate fuel oil, wt.%.
- d. Emissions of all criteria pollutants from the affected boilers, ton/yr.

7.1.10 Reporting Requirements

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

- a. Sulfur content of the distillate fuel oil in excess of the limit specified in Condition 7.1.5(b).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with Conditions 7.1.3(b) and (c) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected boilers.
- b. Compliance with Condition 7.1.3(d) is considered to be assured by the use of distillate fuel oil that meets the sulfur content limit of Condition 7.1.5(b) and by the recordkeeping requirement of Condition 7.1.9(c).
- c. Compliance with the emission limits in Conditions 5.5 are determined by the following emission factors and emission formulas listed below:
 - i. A. Emission factors for the affected boilers when fired by natural gas:

Emission Factor

<u>Pollutant</u>	<u>(lb/mmscf)</u>
PM	7.6
SO ₂	0.6
VOM	5.5
CO	84.0
NO _x	100.0

These are emission factors determined for the affected boilers using standard AP-42 emission factors for natural gas.

- B. Emission formula for the affected boilers when fired by natural gas:

Appropriate Emissions (ton) = Natural Gas Consumed (mmscf) * The Appropriate Emission Factor (lb/mmscf) ÷ 2,000 lb/ton

- ii. A. Emission factors for the affected boilers when fired by distillate fuel oil:

<u>Pollutant</u>	<u>Emission Factor (lb/1000 gal)</u>
PM	2.0
SO ₂	142(S)
VOM	0.2
CO	5.0
NO _x	20.0

Where (S) is the Sulfur content of the distillate fuel oil (wt.%)

These are emission factors determined for the affected boilers using standard AP-42 emission factors for distillate fuel oil.

- B. Emission formula for the affected boilers when fired by distillate fuel oil:

Appropriate Emissions (ton) = Distillate Fuel Oil Consumed (1000 gal) * The Appropriate Emission Factor (lb/1000 gal) ÷ 2,000 lb/ton

7.2 Boilers 15A-1, 15A-2, 2A-1, and 2A-2

7.2.1 Description

The boiler's firing rates are 14.3 mmBtu/hr (FC-0071), 14.3 mmBtu/hr (FC-0072), 29 mmBtu/hr (FC-0074), and 29 mmBtu/hr (FC-0075). The boilers are natural gas fired used primarily to provide space heat and to provide hot water and steam to processing needs.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
FC-0071	14.3 mmBtu natural gas fired boiler	1997	None
FC-0072	14.3 mmBtu natural gas fired boiler	1997	None
FC-0074	29 mmBtu natural gas fired boiler	1999	None
FC-0075	29 mmBtu natural gas fired boiler	1999	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit-specific conditions, is a fuel combustion emission unit as described in Conditions 7.2.1 and 7.2.2.
- b. The affected boilers are subject to the NSPS for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because the construction, modification, or reconstruction is commenced after June 9, 1989 and has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA. The Permittee must comply with 40 CFR 60.48c(g), which is addressed in Condition 7.2.9(a).
- c. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 10 mmBtu/hr to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

- d. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.

7.2.4 Non-Applicability of Regulations of Concern

- a. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 218.303].
- b. The control requirements of 35 IAC 218 Subpart TT shall not apply to fuel combustion units [35 IAC 218.980(f)].

7.2.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel fired in the affected boilers.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boilers are subject to the following:

- a. Combined emissions from the affected boilers shall not exceed the following limits when natural gas is being used to fire the affected boilers:

PM		SO ₂		VOM	
<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
0.3	2.9	0.1	0.3	0.2	2.1
CO		NO _x			
<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>		
2.7	31.9	3.2	38.0		

These limits are based on maximum firing rates, maximum hours of operation, and emission factors and formulas in Condition 7.2.12(b). [T1R]

- b. The above limitations contain revisions to previously issued Permits 97030138 and 99030046. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC

Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits were combined. [T1R]

- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1, 7.2.3(b), and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas fuel usage for the affected boilers, scf/day, scf/mo, and scf/yr.
- b. Emissions of all criteria pollutants from the affected boilers, ton/mo and ton/yr.

7.2.10 Reporting Requirements

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

None

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3 (c) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected boilers.
- b. Compliance with the emission limits in Conditions 5.5 and the limits in Condition 7.2.6 are determined by the following emission factors and emission formulas listed below:
 - i. Emission factors for the affected boilers when fired by natural gas:

<u>Pollutant</u>	<u>Emission Factor (lb/mmscf)</u>
PM	7.6
SO ₂	0.6
VOM	5.5
CO	84.0
NO _x	100.0

These are emission factors determined for the affected boilers using standard AP-42 emission factors for natural gas.

- ii. Emission formula for the affected boilers when fired by natural gas:

Appropriate Emissions (ton) = Natural Gas Consumed (mmscf) * The Appropriate Emission Factor (lb/mmscf) ÷ 2,000 lb/ton

7.3 Unit 03 - Panel and Enclosure Finishing Systems

7.3.1 Description

The Panel Finishing System (PFS) and the Enclosure Finishing System (EFS) consists of several steps involving powder coating with bake ovens and spray coating with top coat oven. After completion, the products are sent to an assembly area for assembly.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
PFS	Panel Finishing System	1972	Air Filter Units
EFS	Enclosure Finishing System	1972	Air Filter Unit, Water Wash, and Catalytic Incinerator

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected finishing system" for the purpose of these unit-specific conditions, is each finishing system described in Conditions 7.3.1 and 7.3.2.
- b. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm [35 IAC 214.301].
- c. Each affected finishing system at the source is subject to 35 IAC 218.204(j)(2)(B), Miscellaneous Metal Parts and Products Coating, which provides that:

No owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds 0.40 kg/liter (3.3 lb/gallon). The emission limitation is 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. 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.

- d. Each affected finishing system is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- e. Each affected finishing system is subject to the emission limits identified in Condition 5.2.2.
- f. Emissions from solvent cleaning at each coating line are required to meet the limitation of 35 IAC 218.301, Use of Organic Material, which states:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) or organic material into the atmosphere from any emission unit, except as provided in Condition 7.1.3(c)(iii) and the following exception: If no odor nuisance exists the limitations of this Condition shall apply only to photochemically reactive material [35 IAC 218.301].

7.3.4 Non-Applicability of Regulations of Concern

- a. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209] except as specified in Condition 7.3.3(f).
- b. Solvent cleaning at a coating line is not subject to 35 IAC 218 Subpart TT due to the exemption for clean-up solvent operations pursuant to 35 IAC 218.980(b)(1) and (2).

7.3.5 Operational and Production Limits and Work Practices

- a. Any owner or operator of a coating line subject to the limitations set forth in Condition 7.3.3(c) (see also 35 IAC 218.204), and with coating lines in operation prior to January 1, 1991 ("pre-existing coating lines"), may, for pre-existing coating lines

only, elect to comply with the requirements of Condition 7.3.5(a) through (c) (see also 35 IAC 218.212), rather than complying with the applicable emission limitations set forth in Condition 7.3.3(c) (see also 35 IAC 218.204), if an operational change of the type described below has been made after January 1, 1991, to one or more pre-existing coating lines at the source. An operational change occurs when a pre-existing coating line is replaced with a line using lower VOM coating for the same purpose as the replaced line ("replacement line"). A source electing to rely on Condition 7.3.5(a) through (c) (see also 35 IAC 218.212) to demonstrate compliance with the requirements of 35 IAC 218 Subpart F shall operate pursuant to federally enforceable permit conditions approved by the Illinois EPA and USEPA [35 IAC 218.212(a)].

- b. Pursuant to 35 IAC 218.212(b), an owner or operator of pre-existing coating lines subject to a VOM content limitation in Condition 7.3.3(c) (see also 35 IAC 218.204) and electing to rely on Condition 7.3.5(a) through (c) (see also 35 IAC 218.212) to demonstrate compliance with this 35 IAC Part 218 must establish, by use of the equations in Condition 7.3.12(a), that the calculated actual daily VOM emissions from all participating coating lines, as defined below, are less than the calculated daily allowable VOM emissions from the same group of coating lines. For any pre-existing coating line to be aggregated for the purposes of Conditions 7.3.5, 7.3.9, or 7.3.10 (see also 35 IAC 218.212, 218.213, and 218.214) ("participating coating lines"), the source must establish that:
 - i. All coatings applied on the participating coating line shall, at all times, have a VOM content less than or equal to the applicable VOM content limitation for such coating listed in Appendix H of 35 IAC Part 218 (see also Attachment 3) [35 IAC 218.212(b)(1)]; and
 - ii. On the date the source elects to rely on Condition 7.3.5(a) through (c) (see also 35 IAC 218.212) to demonstrate compliance with 35 IAC 218 Subpart F, all coatings applied on the participating coating line are not already in compliance with the VOM content limitation for such coating effective on or after March 15, 1996; or the participating coating line is a replacement line, as defined in Condition

7.3.5(a) (see also 35 IAC 218.212(a)) with an operational change occurring on or after January 1, 1991 [35 IAC 218.212(b)(2)].

- c. Pursuant to 35 IAC 218.212(c), notwithstanding Condition 7.3.5(a) (see also 35 IAC 218.212(a)), any owner or operator of a coating line subject to the limitations set forth in 35 IAC 218.204 and electing to rely on Condition 7.3.5(a) through (c) (see also 35 IAC 218.212) to demonstrate compliance with 35 IAC 218 Subpart F, may also include as a participating coating line, until December 31, 1999, only, any replacement line that satisfies all of the following conditions:
 - i. The replacement line is operated as a powder coating line [35 IAC 218.212(c)(1)];
 - ii. The replacement line was added after July 1, 1988 [35 IAC 218.212(c)(2)]; and
 - iii. The owner or operator also includes as a participating coating line one or more coating lines that satisfy the criteria of a replacement line, as described in Condition 7.3.5(a) (see also 35 IAC 218.212(a)) [35 IAC 218.212(c)(3)].
- d. Upon changing the method of compliance with 35 IAC 218 Subpart F from 35 IAC 218.212 to 35 IAC 218.204, the owner or operator of a source shall comply with the requirements of Condition 7.3.9(b) (see also 35 IAC 218.211(c)) [35 IAC 218.214(b)].
- e. Drying Ovens on the affected finishing systems that combust fuel shall only be operated with natural gas as the fuel.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected finishing systems are subject to the following:

- a. Emissions from the affected finishing systems shall not exceed the following limits:

	PFS VOM Emissions	
	<u>(Ton/Mo)</u>	<u>(Ton/Year)</u>
Paint	5.00	30.0
Clean-up	2.55	15.3

	EFS VOM Emissions	
	<u>(Ton/Mo)</u>	<u>(Ton/Year)</u>
Paint	4.00	24.0
Clean-up	0.42	2.5

The above limitations contain revisions to previously issued Permit 95080043. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the increase in emissions of VOM is 13.64 tons/yr. [T1R].

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.3.7 Testing Requirements

- a. Pursuant to 35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act, testing for VOM content of coatings and other materials shall be performed as follows:

Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected finishing systems shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) [35 IAC 218.105(a) and Section 39.5(7)(b) of the Act].

- i. The VOM content of representative coatings "as applied" on the affected finishing systems shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
- ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.3.9(c) directly reflect the application of such material and separately account for any additions of solvent.

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected finishing systems to demonstrate compliance with Conditions 5.5.1, 7.3.3, and 7.3.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 35 IAC 212.108(f), 212.110(e) and Section 39.5(7)(e) of the Act, the owner or operator of an emission unit subject 35 IAC Part 212 shall retain records of all tests which are performed. These records shall be retained for at least five (5) years after the date a test is performed and shall include the following:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.

- b. Pursuant to Section 39.5(7)(e) of the Act, records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.3.7(a), which include the following:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.

- c. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected finishing systems 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 the affected finishing systems; and
 - 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 the affected finishing systems.

- d. Pursuant to 35 IAC 218.213(b), the Permittee shall collect and record all of the following information each day for the affected finishing systems 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 participating coating line;
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on each participating coating line on a daily basis; and
 - iii. The daily weighted average VOM content of all coatings as applied on each coating line as defined at 35 IAC 211.1670 (see also Attachment 4).

- e. Records of the solvent usage for the affected finishing systems, gal/day and gal/yr;
- f. Records of the fuel usage for the Drying Ovens, scf/mo and scf/yr;
- g. The total monthly and annual VOM emissions from the coating lines based on the coating and solvent usage, with supporting calculations; and
- h. Records of monthly and annual aggregate NOx, PM, SO2, and VOM emissions from the Drying Ovens shall be maintained, based on fuel usage and the applicable emission factors, with supporting calculations.

7.3.10 Reporting Requirements

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

- a. A person planning to conduct testing for PM₁₀ or condensible PM₁₀ 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 initiation of the test unless a shorter pre-notification is agreed to by the Illinois EPA. Such notification shall state the specific test methods from Condition 7.3.7(a)(i) (see also 35 IAC 212.108(a)) that will be used [35 IAC 212.108(e)].
- b. 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 Condition 7.3.7(b) (see also 35 IAC 212.110) that will be used [35 IAC 212.110(d)].
- c. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.3.3(c) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.

- d. Pursuant to 35 IAC 218.213(a), upon changing the method of compliance for a pre-existing coating line from the requirements of 35 IAC 218.204 to the requirements of Condition 7.3.5 (see also 35 IAC 218.212), the owner or operator of the source shall certify to the Illinois EPA that each participating coating line, as determined in accordance with Condition 7.3.5 (see also 35 IAC 218.212), will be in compliance with Condition 7.3.5 (see also 35 IAC 218.212) on and after the initial start-up date of such participating coating lines. Such certification shall also include:
- i. The name and identification number of each participating coating line [35 IAC 218.213(a)(1)];
 - ii. The name and identification number of each coating as applied on each participating coating line [35 IAC 218.213(a)(2)];
 - iii. The weight of VOM per volume of each coating and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each participating coating line [35 IAC 218.213(a)(3)];
 - iv. The instrument or method by which the owner or operator will accurately measure or calculate the volume of each coating as applied each day on each participating coating line [35 IAC 218.213(a)(4)];
 - v. The method by which the owner or operator will create and maintain records each day as required in Condition 7.3.9(c) (see also 35 IAC 218.213(b)) [35 IAC 218.213(a)(5)];
 - vi. An example of the format in which the records required in Condition 7.3.9(c) (see also 35 IAC 218.213(b)) will be kept [35 IAC 218.213(a)(6)];
 - vii. A statement that all coatings used on participating coating lines have a VOM content less than or equal to the applicable VOM limitation for such coating set forth within Appendix H of 35 IAC Part 218 (see also Attachment 3), and that all lines either:

- A. Underwent a change in operations incorporating a lower VOM coating on each applicable participating coating line after the date of January 1, 1991 [35 IAC 218.213(a)(7)(A)]; or
 - B. Are not in compliance and continued compliance with the coating limitations in Condition 7.3.3(c) (see also 35 IAC 218.204), compliance with which is required on or after March 15, 1996 [35 IAC 218.213(a)(7)(B)].
- viii. The method by which the owner or operator has calculated K, for the equation contained in Condition 7.3.12(a)(ii)(B) (see also 35 IAC 218.212(d)(2)(B)), if applicable [35 IAC 218.213(a)(8)].
- ix. This certification was submitted on August 1, 1995.
- e. Pursuant to 35 IAC 218.213(c), the owner or operator of participating coating lines shall:
 - i. Notify the Illinois EPA within 30 days following an occurrence of a violation of Condition 7.3.5 (see also 35 IAC 218.212) [35 IAC 218.213(c)(1)]; and
 - ii. Send to the Illinois EPA any record showing a violation of Condition 7.3.5 (see also 35 IAC 218.212) within 30 days following the occurrence of a violation [35 IAC 218.213(c)(2)].
- f. Pursuant to 35 IAC 218.211(c)(1) and 218.214(a) and (c), at least 30 calendar days before changing the method of compliance with 35 IAC 218 Subpart F from 35 IAC 218.212 to 35 IAC 218.204, the owner or operator of a source relying on Condition 7.3.5 (see also 35 IAC 218.212) to demonstrate compliance with 35 IAC 218 Subpart F for one or more pre-existing coating lines shall comply with the following:
 - i. The owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with Section 218.204, on and after the initial start-up date. Such certification shall include:

- A. The name and identification number of each coating as applied on each coating line [35 IAC 218.211(c)(1)(A)]; and
 - B. 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 [35 IAC 218.211(c)(1)(B)].
- ii. The owner or operator shall certify that all remaining participating coating lines, if any, comply and continue to comply with the requirements of Condition 7.3.5 (see also 35 IAC 218.212) [35 IAC 218.214(c)].

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. To demonstrate compliance with Condition 7.3.5(a) through (c) (see also 35 IAC 218.212), a source shall establish the following [35 IAC 218.212(d)]:
 - i. An alternative daily emission limitation shall be determined for all participating coating lines at the source according to Condition 7.3.12(d)(ii) (see also 35 IAC 218.212(d)(2)). All participating coating lines shall be factored in each day to demonstrate compliance. Provided compliance is established pursuant to the requirements in this subsection, nothing in this Section requires daily operation of each participating line. Actual daily emissions from all participating coating lines (E_d) shall never exceed the alternative daily emission limitation (A_d) and shall be calculated by use of the following equation [35 IAC 218.212(d)(1)]:

$$E_d = \sum_{i=1}^n V_i C_i$$

Where:

E_d = Actual daily VOM emissions from participating coating lines in units of kg/day (lb/day);

i = Subscript denoting a specific coating applied;

n = Total number of coatings applied by all participating coating lines at the source;

V_i = Volume of each coating applied for the day in units of l/day (gal/day) of coating (minus water and any compounds which are specifically exempted from the definition of VOM); and

C_i = The VOM content of each coating as applied in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM).

- ii. The alternative daily emission limitation (A_d) shall be determined for all participating coating lines at the source on a daily basis as follows [35 IAC 218.212(d)(2)]:

$$A_d = A_i + A_p$$

Where:

A_i and A_p are defined in Conditions 7.3.12(a)(ii)(A) and (a)(ii)(B) (see also 35 IAC 218.212(2)(A) and (2)(B)).

- A. The portion of the alternative daily emissions limitation for coating operations at a source using non-powder coating (A_i) shall be determined for all such participating non-powder coating lines on a daily basis as follow [35 IAC 218.212(d)(2)(A)]:

$$A_i = \sum_{i=1}^n V_i L_i \frac{(D_i - C_i)}{(D_i - L_i)}$$

Where:

A_i = The VOM emissions allowed for the day in units of kg/day (lb/day);

i = Subscript denoting a specific coating applied;

n = Total number of coatings applied in the participating coating lines;

C_i = The VOM content of each coating as applied in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM);

D_i = The density of VOM in each coating applied. For the purposes of calculating A_i , the density is 0.882 kg VOM/l VOM (7.36 lb VOM/gal VOM);

V_i = Volume of each coating applied for the day in units of l (gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM); and

L_i = The VOM emission limitation for each coating applied, as specified in Condition 7.3.3(c) (see also 35 IAC 218.204), in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM).

- B. The portion of the alternative daily emission limitation for coating operations at a source using powdered coating (A_p) shall be determined for all such participating powder coating lines at the source on a daily basis as follows [35 IAC 218.212(d)(2)(B)]:

$$A_p = \sum_{h=1}^m \sum_{j=1}^n \frac{V_j L_j D_j K_h}{(D_j - L_j)}$$

Where:

- A_p = The VOM emissions allowed for the day in units of kg/day (lb/day);
- h = Subscript denoting a specific powder coating line;
- j = Subscript denoting a specific powder coating applied;
- m = Total number of participating powder coating lines;
- n = Total number of powder coatings applied in the participating coating lines;
- D_j = The assumed density of VOM in liquid coating, 0.882 kg VOM/l VOM (7.36 lb VOM/gal VOM);
- V_j = Volume of each powder coating consumed for the day in units of l (gal) of coating;
- L_j = The VOM emission limitation for each coating applied, as specified in Condition 7.3.3(c) (see also 218.204), in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM); and
- K = A constant for each individual coating line representing the ratio of the volume of coating solids consumed on the liquid coating system which has been replaced to the volume of powder coating consumed on the replacement line to accomplish the same coating job. This value shall be determined by the source based on tests conducted and records maintained pursuant to the requirements of Condition 7.3.10

(see also 35 IAC 218.213)
 demonstrating the amount of coating solids consumed as both liquid and powder. Test methods and recordkeeping requirements shall be approved by the Illinois EPA and USEPA and shall be contained in the source's operating permit as federally enforceable permit conditions, subject to the following restrictions:

1. K cannot exceed 0.9 for non-recycled powder coating systems; or
2. K cannot exceed 2.0 for recycled powder coating systems.

b. Compliance with Conditions 7.3.3(b) is assumed to be achieved by the work practices inherent in operation of natural gas-fired drying ovens. Compliance with Condition 7.3.3(b) is assumed based on the use of raw materials which do not contain sulfur in measurable amounts.

c. To determine compliance with Condition 5.5.1, VOM emissions from the affected finishing systems shall be calculated based on the following:

$$\text{VOM (lb)} = (\text{Coating Usage, gal}) \times (\text{VOM Content of Coating, lb/gal}) + (\text{Solvent Usage, gal}) \times (\text{Density, lb/gal})$$

d. To determine compliance with Condition 5.5, fuel combustion emissions from the drying ovens on the affected finishing systems are determined by the following emission factors and emission formulas listed below:

i. Emission factors for the drying ovens when fired by natural gas:

<u>Pollutant</u>	<u>Emission Factor (lb/mm scf)</u>
PM	7.6
SO ₂	0.6
VOM	5.5
CO	84.0
NO _x	100.0

These are emission factors determined for the drying ovens using standard AP-42 emission factors for natural gas.

- ii. Emission formula for the drying ovens when fired by natural gas:

Appropriate Emissions (ton) = Natural Gas Consumed (mmscf) * The Appropriate Emission Factor (lb/mmscf) ÷ 2,000 lb/ton

7.4 Abrasive Cleaning Cabinet, Tablet Machines, and Rotoblaster

7.4.1 Description

The abrasive cleaning cabinet process (P-0020) consists of an enclosed cleaning cabinet where metal parts are inserted and cleaned with the emission controlled by a dust collector (P-0020-2). The tablet machines (P-0038) use a process of compressing boric acid into cylindrical cakes with the emissions controlled by a dust collector (P-0038). The rotoblaster (P-0050) is rough finishing and polishing process using steel shot with the emissions controlled by a baghouse (P-0050-2).

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
P-0020	Abrasive Cleaning Cabinet	1973	Baghouse
P-0038	Tablet Machines	1991	Dust Collector
P-0050	Rotoblaster	1992	Baghouse

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected process unit" for the purpose of these unit-specific conditions, are emission units described in Conditions 7.4.1 and 7.4.2.
- b. Each affected process unit is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- c. Each affected process unit is subject to the emission limits identified in Condition 5.2.2.

7.4.4 Non-Applicability of Regulations of Concern

N/A

7.4.5 Operational and Production Limits and Work Practices

- a. The Permittee shall operate, maintain, and replace the filters of each affected process unit in a manner that assures compliance with the conditions of this section.
- b. An adequate inventory of spare filters shall be maintained.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected process units are subject to the following:

N/A

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected process units to demonstrate compliance with Conditions 5.5.1 and 7.4.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Results of filter inspections and dates of replacements.

7.4.10 Reporting Requirements

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

- a. Emissions of PM from an affected process unit in excess of the limits specified in Condition 7.1.3(b) within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3(b) is demonstrated by proper operating conditions of the affected process units. This includes operational and production limits and work practices in Conditions 7.4.5(a) and (b) and the record requirements in Condition 7.4.9(a).
- b. Compliance with the emission limits in Conditions 5.5 is determined by each affected process unit, with control, having potential emissions of PM of 0.1 lb/hr (0.44 ton/yr).

7.5 Fuse Coating and Marking Operation; and Resin Mixing, Molding, and Extruding Process

7.5.1 Description

The fuse coating and marking operation is a process where plastic fuse tubes are coated in a small paint booth with paint and cured in a small electric oven. The resin molding operation is the process whereby a two-part cypoxy resin molding is used to manufacture cypoxy molded parts used in the switchgear.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
P-9011 & P-9012	Fuse Coating and Marking Operation	1992	Filter
P-0021	Resin Mixing, Molding, and Extruding Process	1990	Dripak Filter

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected process unit" for the purpose of these unit-specific conditions, are emission units described in Conditions 7.5.1 and 7.5.2.
- b. The affected process units are subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Sections 218.302, 218.303, 218.304 of this Part and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

- d. The affected process units are subject to the emission limits identified in Condition 5.2.2.

7.5.4 Non-Applicability of Regulations of Concern

The affected process units are not subject to 35 IAC Subpart PP or TT because the affected process units together do not have maximum theoretical emissions of 100 tons per year or have a potential to emit of 25 tons per year, pursuant to 35 IAC 218.980(a) and (b). The fuses also meet the plastic parts exception pursuant to 35 IAC 218.980(b)(2)(B).

7.5.5 Operational and Production Limits and Work Practices

- a. The Permittee shall operate, maintain, and replace filters of the affected process units in a manner that assures compliance with the conditions of this section.
- b. An adequate inventory of spare filters shall be maintained.

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected process units are subject to the following:

- a. Emissions from the Fuse Coating and Marking Operation shall not exceed the following limits:

VOM Emissions	
<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
8.0	2.09

These limits are based on the material used by the Fuse Coating Operation.

The above limitations were established in Permit 92080016. These limits ensure that the fuse coating and marking operation does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- b. Emissions from the Resin Mixing, Molding, and Extruding Process shall not exceed the following limits:

	VOM Emissions	
	<u>(lb/Mo)</u>	<u>(Ton/Year)</u>
VOM	2,300	13.5
Perc	175	1.05

These limits are based on the material used by the Resin Mixing, Molding, and Extruding Process with a yearly contemporaneous VOM emission increase of 0.65 tons per year. (Note: Perc = Perchloroethylene)

The above limitations contain revisions to previously issued Permit 96050074. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the increase in emissions of VOM is 5.07 tons/yr. [T1R].

- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected process units to demonstrate compliance with Conditions 5.5.1 and 7.5.3, pursuant to Section 39.5(7)(b) of the Act:

- a. The material used in the affected process units, lb/month and lb/year.
- b. The VOM content of each material used in the affected process units, wt.%.
- c. The VOM emissions from each affected process units, ton/month and ton/year.
- d. Results of filter inspections and dates of replacements.

7.5.10 Reporting Requirements

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

- a. Emissions of PM from an affected process unit in excess of the limits specified in Condition 7.5.3(b) within 30 days of such an occurrence.
- b. Emissions of VOM from an affected process unit in excess of the limits specified in Condition 7.5.3(c) and 7.5.6 within 30 days of such an occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance with Condition 7.5.3(b) and (c) is demonstrated by proper operating conditions of the affected process units. This includes operational and production limits and work practices in Conditions 7.5.5(a) and (b) and the record requirements in Condition 7.5.9.

- b. Compliance with the emission limits in Conditions 5.5 and 7.5.6 shall be based on the recordkeeping requirements in Condition 7.5.9 and the formulas listed below:

$$\text{VOM Emissions (ton)} = \Sigma [(\text{Material Usage, lb}) \times (\text{VOM Content of the Material, wt.\%})] \div 2000 \text{ lb/ton}$$

Where Σ = is the summation of all Materials

7.6 Adhesive Application

7.6.1 Description

The adhesive application is a process that involves hand dipping of steel parts into cans of adhesive.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
P-0052	Adhesive Application	1992	Afterburner

7.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected adhesive application" for the purpose of these unit-specific conditions, is an adhesive application described in Conditions 7.6.1 and 7.6.2.
- b. The affected adhesive application is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

- c. Each affected adhesive application shall comply with one of the following options pursuant to 35 IAC 218.207(b):
 - i. The affected adhesive application is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the affected adhesive application and the control device has a 90 percent efficiency, or
 - ii. The system used to control VOM from the affected adhesive application is demonstrated to have an overall efficiency sufficient to limit VOM emissions to no more than what is allowed under 35 IAC 218.204. Such overall

efficiency shall be determined as follows, pursuant to [35 IAC 218.207]:

- A. Obtain the emission limitation from the appropriate subsection in 35 IAC 218.204.
- B. Calculate "S" according to the following equation:

$$S = \frac{C}{1 - (C/D)}$$

Where:

S = The limitation on VOM emissions in terms of kg VOM/1 (lbs VOM/gal) of solids

C = The limitation of VOM emissions in terms of kg/1 (lbs/gal) of coating (minus water and any compounds which are specifically excluded from the definition of VOM) specified in Section 218.204 of this Part

D = The density of VOM in the coating. For the purposes of calculating S, the density is 0.882 kg VOM/1 VOM (7.36 lbs VOM/gal VOM)

- C. Calculate the overall efficiency required according to the following equation:

$$E = ([VOMa - VOM1]/VOMa) \times 100$$

Where:

E = Equivalent overall efficiency of the capture system and control device as a percentage

VOMa = Actual VOM content of a coating, or the daily-weighted average VOM content of two or more coatings (if more than one coating is used), as applied to the subject coating line as determined by the applicable test methods and procedures specified in subsection (a) of this Section in units of kg

VOM/l (lb VOM/gal) of coating solids as applied

VOM1 = The VOM emission limit specified in 35 IAC 218.204 or 218.205 in units of kg VOM/l (lb VOM/gal) of coating solids as applied

- c. The subject capture systems and control devices must be operated at all times when the affected coating lines are in operation [35 IAC 218.207(a)].
- d. Each affected adhesive application is subject to the emission limits identified in Condition 5.2.2.

7.6.4 Non-Applicability of Regulations of Concern

No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209.

7.6.5 Operational and Production Limits and Work Practices

- a. The afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 650°F, before the coating process is begun, and this temperature shall be maintained during operation of the affected coating line.
- b. The Permittee shall follow good operating practices for the afterburner, including periodic inspection, routine maintenance and prompt repair of defects.

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected adhesive application is subject to the following:

- a. Emissions from the affected adhesive application shall not exceed the following limits:

VOM Emissions	
<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
0.46	2.0

These limits are based on the material used by the affected adhesive application.

The above limitations contain revisions to previously issued Permit 92080016. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the increase in emissions of VOM is 1.72 tons/yr. [T1R].

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.6.7 Testing Requirements

Testing for VOM content of coatings and other materials and the efficiency of each capture system and control device shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected adhesive application shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) [35 IAC 218.105(a) and Section 39.5(7)(b) of the Act].

- a. The VOM content of representative coatings "as applied" on the affected adhesive application shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
- b. This testing may be performed by the supplier of a material provided that the supplier provides

appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.6.9(c) directly reflect the application of such material and separately account for any additions of solvent.

7.6.8 Monitoring Requirements

An owner or operator that uses an afterburner to comply with any Section of 35 IAC 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 afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which has a catalyst bed, commonly known as a catalytic afterburner, the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust [35 IAC 218.105(d)(2)(A)(ii)].

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected adhesive application to demonstrate compliance with Conditions 5.5.1 and 7.6.3, pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each coating as applied.
- b. The usage of each coating, gallons/mo and gallons/yr.
- c. The VOM content per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each affected paint line for each coating.
- d. Temperature of the continuous monitoring equipment.

7.6.10 Reporting Requirements

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

- a. Emissions of PM from an affected adhesive application in excess of the limits specified in Condition 7.6.3(b) within 30 days of such an occurrence.
- b. Emissions of VOM from an affected adhesive application in excess of the limits specified in Condition 7.6.3(c) within 30 days of such an occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

- a. Compliance with Condition 7.6.3(b) is demonstrated by proper operating conditions of the affected adhesive application. This includes operational and production limits and work practices in Conditions 7.6.5.
- b. Compliance with the emission limits in Conditions 5.5 shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

- i. Emissions from the affected adhesive application from the use of coating shall be calculated based on the following formula:

$$\text{VOM Emissions (lb)} = \Sigma (\text{Percent VOM in the Coating, \%}) * (\text{Overall Coating Density, lb/gal}) * (\text{Coating Usage, gal/yr}) * (1 - \text{Control Efficiency of the Afterburner, \%})$$

Where:

The summation Σ is the summation of all coating used.

- c. Compliance with Conditions 7.6.3(c) is demonstrated by proper operating conditions of the affected process units and the control equipment. This includes operational and production limits and work practices in Condition 7.6.5(a) and (b) and the recordkeeping requirements in Condition 7.6.9.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after December 29, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA,

emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be

submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

iii. Illinois EPA - Air Permit Section (MC 11)

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee

shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

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

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

P = Process weight rate; and
E = Allowable emission rate; and,

- i. Up to process weight rates of 408 Mg/hr (450 T/hr):

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

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

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

c. Limits for Process Emission Units For Which
Construction or Modification Commenced On or After
April 19, 1972 [35 IAC 212.321(c)]:

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

10.2 Attachment 2 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 Baseline VOM Content Limitations for 35 IAC 218.212
Cross-Line Averaging

This Attachment contains limitations for purposes of determining compliance with the requirements in Condition 7.3.5 (see also 35 IAC 218.212). A source must establish that, at very least, each participating coating line used for purposes of cross-line averaging meets the Federal Implementation Plan level of VOM content, as listed below. The emission limitations for participating coating lines that must not be exceeded are as follows:

	kg/l	lb/gal
Miscellaneous metal parts and products, extreme performance coating	0.42	3.5

10.4 Attachment 4 Daily-Weighted Average VOM Content

"Daily-weighted average VOM content" means the average VOM content of two or more coatings as applied on a coating line during any day, taking into account the fraction of total coating volume that each coating represents, as calculated with the following equation [35 IAC 211.1670]:

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

Where:

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

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

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

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

V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

JRC:psj

10.5 Attachment 5 Baseline Emissions Summary

Seasonal VOM emissions from excluded units, in tons/season (TPS):

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>	<u>Notes</u>
Enclosure Finishing System	9.57	9.22	a
Panel Finishing System	4.83	4.83	a
Various Fuel Combustion	<u>0.04</u>	<u>0.04</u>	
Total:	14.44	14.09	

Seasonal VOM emissions from units subject to further reduction, in TPS:

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination*</u>	<u>Notes</u>
Resin Molding (includes contingent unit)	1.86	1.86	
Bldg. 1 Vapor Degreaser	2.03	2.03	
Bldg. 2 Vapor Degreaser	0.30	0.30	
Bldg. 5 Vapor Degreaser	2.55	2.55	
Bldg. 7 Vapor Degreaser	0.65	0.65	
Adhesive Application	0.86	0.86	b
Condursal Coating	0.15	0.15	
Fuse Coating	0.42	0.42	
Fuse Connector Marking	0.03	0.03	
Metal Pouring	<u>0.09</u>	<u>0.09</u>	
Total:	8.74	8.74	

- Notes:
- a. For the enclosure finishing system (EFS) and panel finishing system (PFS) the Illinois EPA has combined emissions from booths and ovens. The ERMS application had them separated. Total should be the same.
 - b. Insufficient supporting information was given to justify BAT.

The source shall maintain records of actual seasonal VOM emissions for all emission units not considered insignificant activities in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit starting with the 1998 seasonal allotment period of May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by November 30 of each year, pursuant to 35 IAC 205.300.

TOTAL SOURCE ALLOTMENT = 14.09 + (0.88 x 8.94) = 21.96 TPS

OR 220 ATU

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATU's equals 1 ton.

Please note that claims of over compliance, under compliance and/or BAT may have been modified to reflect the requirements of the ERMS Program at 35 IAC 205.405(b).

The Illinois EPA has determined that the emission units listed below do NOT meet the criteria necessary to qualify for over compliance, under-compliance and/or BAT, for the reasons explained in the notes.

Adhesive Application

JRC:jar

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

S & C Electric Company is located at 6601 North Ridge Boulevard, Chicago. The source manufactures switchgear and switchboard apparatus. In addition, the primary pollutant at this source is VOM which is produced from many of the multiple manufacturing processes.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
FC-0009	9.8 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None
FC-0011	23.6 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None
FC-0013	23.6 mmBtu natural gas fired boiler with distillate fuel oil backup	1962	None
FC-0071	14.3 mmBtu natural gas fired boiler	1997	None
FC-0072	14.3 mmBtu natural gas fired boiler	1997	None
FC-0074	29 mmBtu natural gas fired boiler	1999	None
FC-0075	29 mmBtu natural gas fired boiler	1999	None
PFS	Panel Finishing System	1972	Air Filter Units
EFS	Enclosure Finishing System	1972	Air Filter Unit, Water Wash, and Catalytic Incinerator
P-0020	Abrasive Cleaning Cabinet	1973	Baghouse
P-0038	Tablet Machines	1991	Dust Collector
P-0050	Rotoblaster	1992	Baghouse
P-9012	Fuse Coating and Marking Operation	1992	Filter
P-0021	Resin Mixing, Molding, and Extruding Process	1990	Dripak Filter
P-0052	Adhesive Application	1992	Afterburner

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	92.48
Sulfur Dioxide (SO ₂)	17.12
Particulate Matter (PM)	18.63
Nitrogen Oxides (NO _x)	72.88
HAP, not included in VOM or PM	---
TOTAL	201.11

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

JRC:psj