DRAFT/PROPOSED CAAPP PERMIT
October 26, 2009

217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Titan Tire Corporation of Freeport
Attn: Ken Thompson
3769 Route 20 East
Freeport, Illinois 61032

I.D. No.: 177813AAA
Application No.: 95120073

Date Received: March 26, 2007
Date Issued: TO BE DETERMINED
Expiration Date: TO BE DETERMINED

Operation of: Rubber Tires Manufacturing Plant
Source Location: 3769 Route 20 East, Freeport, Stephenson County, 61032
Responsible Official: Steve Strauss, Operations Manager

This permit is hereby granted to the above-designated Permittee to OPERATE Rubber Tires Manufacturing Plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

ECB:AB:psj

cc: Illinois EPA, FOS, Region 2
CES
Lotus Notes

[1] Except as provided in Conditions 1.5 and 8.7 of this permit.

TABLE OF CONTENTS

1.0 SOURCE IDENTIFICATION

1.1 Source

Titan Tire Corporation of Freeport
3769 Route 20 East
Freeport, Illinois 61032
815/235-7643

I.D. No.: 177813AAA
County: Stephenson
Standard Industrial Classification: 3011, Rubber Products

1.2 Owner/Parent Company

Titan Tire Corporation
2701 Spruce Street
Quincy, Illinois 62301

1.3 Operator

Titan Tire Corporation of Freeport
3769 Route 20 East
Freeport, Illinois 61032

Ken Thompson
815/235-7643

1.4 Source Description

Titan Tire Corporation of Freeport is located at 3769 Route 20 East in Freeport and manufacturers rubber tires primarily for agricultural and farm equipment, and some light industrial.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

a. This permit contains “Title I conditions” that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as “T1.”

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
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
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
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 CONDITIONS FOR 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:

Marking Applicators
Hand Rubber Stamps
Hydrochloric Acid Storage Tank
Hydrocarbon Solvent “K” Plant-Wide Usage

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

None

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

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

b. Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

c. 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)].

d. 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)].

e. Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

f. Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

g. Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

h. Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

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 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 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 (see Attachment 2) and 35 IAC Part 266. 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.

3.2.2 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, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify

as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

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

Description	Date Constructed	Emission Control Equipment	Subsection of this Permit
Carbon Black Handling Units	1963	Baghouses	7.1
Blending and Mixing Units	1963; 1968; 1970; 1974; 1988; 2002 (Modification)	Dust Collectors	7.2
Extrusion/Calendaring Areas	1963; 1970; 1996	None	7.3
Bead Preparation Areas	1979	None	7.4
Green Tire Spray Booths	1972-2000	None	7.5
Curing Presses	1963-2001;2008; 2002 (Modification)	None	7.6
Boilers	1979	None	7.7
Turbines	1996	None	7.8

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

5.2 Area Designation

5.2.1 This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (CO, lead, NO_2, ozone, $PM_{2.5}$, PM_{10}, SO_2).

5.3 Source-Wide Applicable Provisions and Regulations

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

5.3.2 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.

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

5.3.3 Ozone Depleting Substances

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.

5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 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 RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B 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 Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

b. This permit and the terms and conditions herein do not affect the Permittee’s past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.3.6 Episode Action Plan

a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, 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 and is incorporated by reference into this permit.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.

c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.3.7 Rubber Tire Manufacturing (40 CFR Part 60, Subpart BBB)

The following tire manufacturing operations involved into manufacturing of rubber tires with a bead diameter less than or equal to 0.5 meter (19.7 inches) and a cross section dimension less than or equal to 0.325 m (12.8 inches) and constructed, modified, or reconstructed after January 20, 1983 are subject to requirements of 40 CFR Part 60, Subpart BBB: each under tread cementing operation; each sidewall cementing operation; each tread end cementing operation; each bead cementing operation; and each green tire spraying operation. Specific requirements of 40 CFR Part 60, Subpart BBB are discussed further in Section 7.

5.4 Source-Wide Non-Applicability of Regulations of Concern

a. Manufacturing of rubber tires with dimensions exceeding those mentioned in Condition 5.2.7 and/or constructed prior to January 20, 1983 are exempt from requirements of 40 CFR Part 60, Subpart BBB.

b. This source is not subject to 40 CFR Part 63, Subpart XXXX “National Emissions Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing” because this source is not a major source of hazardous air pollutant (HAP) emissions. If the source exceeds major source threshold levels for HAP emissions, as established in 40 CFR 63.5981(a)(2), then the source has to demonstrate compliance with Subpart XXXX and apply for revision of this permit.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	639.47
Sulfur Dioxide (SO_2)	0.23
Particulate Matter (PM)	74.59
Nitrogen Oxides (NO_x)	96.71
HAP, not included in VOM or PM	22.19
Total	833.19

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. 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). This condition is being imposed so that the source is not a major source of HAP emissions and requirements of 40 CFR Part 63, Subpart XXXX do not apply to the source. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.2 and 5.10.2.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA. However, there are unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All

such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:

Test the top five coatings that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.

b. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Recordkeeping requirement for applicability determination

For non-major HAP (area) sources under 40 CFR Part 63, the Permittee should follow the requirements established by 40 CFR 63.10(b)(3) to support exempt status from 40 CFR Part 63 Subpart XXXX:

If an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112 (d) or (f), and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under this part) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the Administrator to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of this part for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under Section 112, if any. The requirements to determine applicability of a standard under 63.1(b)(3) and to record the results of that determination under paragraph (b)(3) of this section shall not by themselves create an obligation for the owner or operator to obtain a title V permit [40 CFR 63.10(b)(3)].

5.9.3 Records for HAP Emissions

a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.

c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each coating, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 – 3%) then the highest value shall be used.

5.9.4 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.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 The Permittee shall notify the Illinois EPA, Air Compliance Unit, of the excedances of HAP emission limits specified in Condition 5.6.2 based on the annual HAP records required by Condition 7.9.2 within 30 days of discovery such violation.

5.10.3 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

5.12 Source-Wide Compliance Procedures

5.12.1 General Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be based on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

Not applicable to this source

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Carbon Black Handling Units

7.1.1 Description

Carbon black is used as an additive in the production of rubber compounds. The material is stored in silos and transferred to mixers by sealed conveyors.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Carbon Black Handling Units	Carbon Black Silos #1 and #2	Baghouses
	Carbon Black Unloading/Conveying Lines #1 and #2	Baghouses

7.1.3 Applicable Provisions and Regulations

a. An affected "carbon black handling unit" is an emission unit, which transfers or stores raw materials prior to further mixing and processing, as described in Conditions 7.1.1 and 7.1.2 above.

b. An affected carbon black handling unit is subject to 35 IAC 212.322(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 process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (see also Attachment 2) [35 IAC 212.322(a)].

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 35 IAC 212.122 [35 IAC 212.123(a)].

7.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected carbon black handling unit not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected blending and mixing unit does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.1.5 Control Requirements and Work Practices

The Permittee shall follow good operating and maintenance practices, including replacement of the fabric filters in a manner that assures compliance with the conditions of this Section. This condition is established pursuant to section 39.5(7)(a) of the Act.

7.1.6 Production and Emission Limitations

Production and emission limitations are not set for the affected carbon black handling units.

7.1.7 Testing Requirements

a. Measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109, so as to demonstrate compliance with the emission limits in Condition 7.1.3(c).

b. Opacity from the affected carbon black handling units and associated baghouses shall be tested once in five years prior the expiration date of this permit and be submitted to the Illinois EPA with the renewal of this permit. Testing shall be done in accordance with Conditions 7.1.7(a), 8.5 and 8.6 of this permit.

c. Conditions 7.1.7(a) and (b) are established pursuant to section 39.5(7)(c) of the Act.

7.1.8 Monitoring Requirements

The Permittee shall perform detailed inspections of the baghouses for the affected carbon black handling units at least every 6 months while the processes are out of service, with an initial inspection performed before any maintenance and repair activities are conducted during the period the process is out of service and a follow-up inspection performed after any such activities are completed [Sections 39.5(7)(a) and (d) of the Act].

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected carbon black handling units to demonstrate compliance

with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Amount of carbon black processed in lb/hr and ton/yr.

b. Emissions calculated based in accordance with procedures established in Condition 7.1.12.

c. Inspection, maintenance and repair logs of baghouses.

d. Records of opacity measurements conducted in accordance with requirements of Condition 7.1.7.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected carbon black handling units with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

If there is an exceedance of the emission limitations of Condition 7.1.3, as determined by the records or tests required by this permit, the Permittee shall submit a report to the Illinois EPA in Springfield, Illinois, within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected carbon black handling units.

7.1.12 Compliance Procedures

a. Compliance with emission limits of Condition 7.1.3(c) shall be based on the appropriate testing, recordkeeping and reporting requirements as established in Conditions, 7.1.7, 7.1.9 and 7.1.10 respectively.

b. Compliance with emission limits of Condition 7.1.3(b) shall be based on the proper operation and maintenance required by Condition 7.1.5, inspection, recordkeeping and reporting requirements established in Conditions 7.1.8, 7.1.9 and 7.1.10, respectively.

c. Compliance with control requirements and work practices of Condition 7.1.5 shall be based on inspection requirements of Condition 7.1.8.

d. Emissions shall be calculated based on the following equation:

   PM/PM_{10} Emissions = (Air flow, cfm) x (Estimated Dust Loading, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [100 – (Efficiency, %)/100]

e. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.2 Blending and Mixing Units

7.2.1 Description

A variety of pigments are processed (mixed and weighed) prior to being added to the mixers. Mixers are the primary components for producing the rubber compounds that are used for tires. Operated in a batch mode, the mixers blend the raw materials together to form feedstock for the remaining processes.

Note: This narrative description is for informational purposes only and is not enforceable.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Blending and Mixing Units	Banbury Mixers #1 – #7	Dust Collectors
	Mixer Rubber Handling Systems #2, #3, and #6	Dust Collectors
	Pigment Blending	Dust Collectors

7.2.3 Applicable Provisions and Regulations

a. The “affected blending and mixing units” for the purpose of these unit-specific conditions, are the units described in Conditions 7.2.1 and 7.2.2 above.

b. Each Banbury Mixer #1-#7 is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. All affected blending and mixing units (except those indentified in Condition 7.2.3(b) above) are subject to 35 IAC 212.322(b)(1) and (b)(2), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any

existing process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

d. Each affected blending and mixing unit identified in Condition 7.2.2 is subject to the following:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

e. Each affected blending and mixing unit identified in Condition 7.2.2 is subject to the following:

No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122 [35 IAC 212.123(a)].

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected blending and mixing unit not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected blending and mixing unit does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

b. This permit is issued based on the affected blending and mixing unit not being subject to 35 IAC Part 215, Subpart S “Rubber and Miscellaneous Plastic Products”, because such unit/operation is not identified in 35 IAC 215.461 and 215.462.

7.2.5 Control Requirements and Work Practices

The Permittee shall follow good operating and maintenance practices, including replacement of the fabric filters in a manner that assures compliance with the conditions of this Section. This condition is established pursuant to section 39.5(7)(a) of the Act.

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6.1, the affected blending and mixing units are subject to the following:

a. i. Usage of silane coupler in the affected Banbury mixers ##1-7, determined as the amount of silane coupler material, including carrier material provided by the supplier, shall not exceed the following limits:

Silane Coupler Usage	
(Tons/Month)	(Tons/Year)
180.4	1,443.3

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

b. Emissions of VOM from the combined operation of the affected Banbury mixers ##1-7 and all curing presses identified in Condition 7.6.2 shall not exceed 0.194 lbs per pound of silane coupler used at the affected mixers and presses. Compliance with this limit shall be determined as a monthly average, in accordance with Condition 7.2.12. This limitation represents Best Available Control Technology (BACT) for these operations.

c. Emissions of VOM attributable to use of organo-silane coupling agents in the affected Banbury mixers and affected curing presses shall not exceed the following limits:

VOM Emissions	
(Tons/Month)	(Tons/Year)
30.0	280.0

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).

d. The above limitations in Conditions 7.2.6(a),(b) and (c) were established in the PSD Permit 01040070, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1].

7.2.7 Testing Requirements

a. i. Measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109, so as to demonstrate compliance with the emission limits in Condition 7.2.3(e).

ii. Opacity from the affected blending and mixing units and associated dust collectors shall be tested once in five years prior the expiration date of this permit and be submitted to the Illinois EPA with the renewal of this permit. Testing shall be done in accordance with Conditions 7.2.7(a)(i), 8.5 and 8.6 of this permit.

iii. Conditions 7.2.7(a) and (b) are established pursuant to section 39.5(7)(c) of the Act.

b. i. If the Permitee decides to rely on a loss factor for generation of VOM from use of organo-silane coupling agents that is lower than 0.194 lbs per pound as specified in Condition 7.2.6(b), the Permittee shall conduct testing of VOM emissions from the affected Banbury mixers and affected curing presses while using organo-silane coupling agents measured at the Permittee’s expense by an approved testing service, to confirm that such lower factor is representative for this source. This condition is established pursuant to section 39.5(7)(c) of the Act.

ii. The following methods and procedures shall be used for testing of emissions, as approved by the Illinois EPA. Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Volatile Organic Material	USEPA Method 18, 25 or 25A, as appropriate

iii. The Permittee shall submit a written test plan to the Illinois EPA for its approval for the initial testing for VOM and if a significant change in the procedures for this testing is planned from the procedures followed in the previous test. This plan shall be submitted at least 90 days prior to the actual date of testing and include the following information as a minimum:

A. A description of the planned test procedures.

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.

D. The methodology that will be used to determine the operating rate during the period of testing, e.g., the rate of coupling introduced to the process.

iv. The Permittee shall notify the Illinois EPA prior to conducting these measurements to enable the Illinois EPA to observe testing. Notification for the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may accept shorter advance notice if it does not interfere with the Illinois EPA's ability to observe testing.

v. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 30 days after the test results are compiled and finalized.

vi. The Final Report from testing shall include as a minimum:

A. A summary of results.

B. General Information.

C. A detailed description of methodology for determination of the rate of VOM introduced into processes during the period of testing, with supporting information.

D. Detailed description of operating conditions of the emission unit(s) being tested, including:

1. Process information, e.g. type and amount of rubber processed and organo-silane content; and

2. All other relevant control equipment information, i.e., equipment condition and operating parameters during testing.

E. Data and calculations.

F. Conclusions.

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected blending and mixing units.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected blending and mixing units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Banbury Mixers #1 – #7

i. Changes in the compounding process or the type of silane coupler used that may increase the evolution of VOM, with description, the effect on evolution of VOM-emissions, and supporting data and calculations.

ii. Total silane coupler throughput on a monthly and annual basis through the affected Banbury mixers (ton/mo and ton/yr).

iii. VOM emissions from the affected emission units expressed as lb VOM per lb of silane coupler processed, with supporting calculations.

iv. Total monthly and annual VOM emissions for the affected Banbury mixers, as calculated based on the procedures established in Condition 7.2.12.

b. All affected blending and mixing units

i. Total rubber throughput on the monthly and annual basis (ton/mo and ton/yr).

ii. Total blending throughput on the monthly and annual basis (ton/mo and ton/yr).

iii. Total monthly and annual VOM emissions calculated based on the procedures established in Condition 7.2.12.

c. Inspection, maintenance and repair logs of baghouses.

d. Records of opacity measurements and VOM testing conducted in accordance with requirements of Condition 7.2.7.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected blending and mixing units with the permit requirements, 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:

Reporting of Deviations

a. Emissions of regulated air pollutants from the affected blending and mixing units in excess of the limits specified in Condition 7.2.3 within 30 days of such occurrence.

b. Operation of the affected blending and mixing units in excess of production and emission limits specified in Condition 7.2.6 within 30 days of such occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected blending and mixing units.

7.2.12 Compliance Procedures

a. Compliance with Conditions 7.2.3(b), (c) and 7.2.3(e) is addressed by the normal work practices and maintenance activities required in Condition 7.2.5 and the records and reports required in Conditions 7.2.9 and 7.2.10.

b. Compliance with the emission limits in Conditions 5.6.1 and 7.2.6(a),(b) and (c) is addressed by the records and reports required in Conditions 7.2.9 and 7.2.10 and the emission factor listed below (this factor shall represent maximum theoretical generation of VOM from the reaction of the most volatilizing organo-silane coupler with the rubber matrix):

For the proposed coupling agents, this yields a factor of:

E_{BMCE} = 0.194 lbs x lbs of silane coupler used

Where the emission factor of 0.194 lb/VOM for each lb of silane coupler developed in conjunction with studies performed by the Rubber Manufacturing Association.

c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.3 Extrusion/Calendaring Areas

7.3.1 Description

Extruder #2 produces tire components by combining a variety of rubber compounds and extruding them into the desired shapes of either tread or sidewall. Some treads receive an application of tread end cement at the Extruder #2. The calendar lines combine fabric and rubber compounds to produce the materials used in the construction of tires.

Note: This narrative description is for informational purposes only and is not enforceable.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Construction Dates
Extrusion/Calendaring Areas	3 Roll Calendar Line	None	1963
	2 Roll Calendar Line	None	1975
	4 Roll Calendar Lines #1 and #2	None	1963
	Extruder #2	None	1965

7.3.3 Applicable Provisions and Regulations

a. The “affected Extrusion/Calendaring Areas” for the purpose of these unit-specific conditions, are the operations described in Conditions 7.3.1 and 7.3.2 above.

b. Each affected Extrusion/Calendaring Areas (constructed or modified after April 14, 1972) is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Each affected Extrusion/Calendaring Area (constructed or modified prior to April 14, 1972) is subject to 35 IAC 212.322(b)(1) and (b)(2), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

d. Each affected Extrusion/Calendaring Area identified in Condition 7.3.2 is subject to the following:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301]. This emission limitation is applied to any operation other than tread end and bead cementing.

e. Extruder #2 is subject to the following requirements of 40 CFR Part 60, Subpart BBB and 35 IAC 215.463:

Each tread end cementing operation performed on the Extrusion/Calendaring Areass is limited to 10 grams of VOM emissions or less per tire, pursuant to 35 IAC 215.463 and 40 CFR 60.542(a)(3).

7.3.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected Extrusion/Calendaring Areas not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected Extrusion/Calendaring Areas does not use an add-on control device to achieve compliance with an emission limitation or standard.

b. The calendar lines are not subject to 40 CFR Part 60 Subpart BBB “Standards of Performance for Rubber Tire Manufacturing Industry” because these lines are not involved into applicable operations defined in 40 CFR 60.540(a).

7.3.5 Control Requirements and Work Practices

For Extruder #2, at all times, the Permittee shall to the extent practicable, maintain and operate the automatic tread end cementing operation in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to

40 CFR 60.11(d). This condition is established pursuant to requirement of permit 02080008.

7.3.6 Production and Emission Limitations

For Extruder #2, VOM emissions from the automatic tread end cementing operations shall not exceed 0.44 tons/month and 4.4 tons/year.

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).

The above limitations were established in construction permit 02080008, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1].

7.3.7 Testing Requirements

a. For Extruder #2, monthly performance tests shall be conducted as follows pursuant to 40 CFR 60.543(d):

   For each tread end cementing operation where water-based cements containing 1.0 percent, by weight, of VOC or more are used (inside and/or outside) that do not use a VOC emission reduction system, the owner or operator shall use the following procedure to determine compliance with the g/tire limit specified under 40 CFR 60.542(a)(3):

   i. Determine the density and weight fraction VOC of each cement from its formulation or by analysis of the cement using Method 24 as specified under 40 CFR 60.543(c)(1).

   ii. Calculate the total mass of VOC used at the affected facility for the month (M_o) as specified under 40 CFR 60.543(c)(2).

   iii. Determine the total number of tires cemented or sprayed at the affected facility for the month (T_o) by the following procedure:

      For a trend end cementing operation, T_o equals the number of treads cemented for the month.

   iv. Calculate the mass of VOC used per tread cemented at the affected facility for the month (G):

$$G = \frac{M_o}{T_o}$$

b. In determining compliance for each tread end cementing operation, the owner or operator shall include only those

tires defined under 40 CFR 60.541(a) when determining T_o [40 CFR 60.543(m)]

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected Extrusion/Calendaring Areas.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected Extrusion/Calendaring Areass to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Total rubber throughput on the monthly and annual basis (ton/mo and ton/yr).

b. Total cement usage, gallons/pounds per month and gallons/pounds per year.

c. Cement usage on Extruder #2, gallons/pounds per month and gallons/pounds per year.

d. Weight fraction of VOM in each cement used for the tread end cementing operation, wt. %.

e. VOM emissions from each type of the cementing operations performed subject to 40 CFR 60.542(a) and calculated based on the procedures established in Condition 7.3.12.

f. Total emissions of VOM calculated based on the procedures established in Condition 7.3.12.

g. Results of the monthly performance tests as specified under 40 CFR 60.543(b)(1) and required by 40 CFR 60.545(e).

e. Pursuant to 40 CFR 60.545(f), the Permittee of operation of a tread end cementing operation using water-based cements containing less than 1.0 percent by weight of VOC, as specified under 40 CFR 60.543(b)(4), shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected Extrusion/Calendaring Areass with the permit requirements, 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. Reporting of Deviations

Emissions of regulated air pollutants from the affected Extrusion/Calendaring Areass in excess of the limits specified in Condition 7.3.3 within 30 days of such occurrence.

b. The Permittee shall follow the following reporting requirements established in 40 CFR 60.546 (c) and (f):

i. Each owner or operator subject to the provisions of Subpart BBB shall report the results of all initial performance tests, as required under 40 CFR 60.8(a), and the results of the performance tests required under 40 CFR 60.543(b)(2) and (b)(3). The following data shall be included in the report for each of the above performance tests:

For each affected facility that elects to comply with the alternate limit specified under 40 CFR 60.542(a): The mass of VOC used (M_O), the number of tires processed (T_O), and the mass of VOC emitted per tire processed (N).

ii. Once every 6 months each owner or operator subject to the provisions of 40 CFR 60.545 shall report, as applicable:

Each monthly average VOC emission rate that exceeds the VOC emission limit per tire or per bead specified under §60.542(a), as applicable for the affected facility.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

a. i. The Permittee may use rubber or cement compounds other than those identified in Condition 7.3.12(b). If this is a case, the Permittee shall start using other appropriate emission factors associated with application of new compounds and adopted by the Rubber Manufacturing Association and/or USEPA as a part of AP-42 with a prior written notification to the Illinois EPA as required by 39.5(12)(a) of the ACT.

ii. The Permittee may make such changes without a permit revision, if the changes are not modifications under any provision of Title I of the Clean Air Act. This condition does not affect the Permittee’s obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102.

iii. The permit shield described in Condition 8.1 and 39.5(7)(j) of the Act shall not apply to any change made in accordance with operational flexibility described above.

b. This condition is established pursuant to 39.5(12)(a) of the Act.

7.3.12 Compliance Procedures

a. Compliance with emission limits in Condition 7.3.3(e) for cementing operations shall be demonstrated through the testing, recordkeeping and reporting procedures established by Conditions 7.3.7, 7.3.9 and 7.3.10, respectively.

b. Compliance with VOM emission limit on Conditions 5.6.1, 7.3.3(d) and 7.3.6 shall be determined and calculated based on the following emission factors developed by the Rubber Manufacturing Association and the records of material throughput as identified in condition 7.3.9:

Emission Units	Rubber Compound	VOM Emission Factor, lb/lb Rubber Processed
Mill Line/Extruder #2	#6 #4	5.64 E-05 8.37 E-05
Mill Line/3-Roll Calendar: Mills Calendars	 #2 #2	 1.10 E-04 5.59 E-05
Mill Line/2-Roll Calendar: Mills Calendars	 #2 #2	 1.10 E-04 5.59 E-05
Mill Line/4-Roll Calendar: Mills Calendars	 #1 #1	 8.99 E-05 5.33 E-05

Emission Units	VOM Content, wt.%
Extruder #2: End Cementing Marking/Stripping	 83 77

c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.4 Bead Preparation Areas

7.4.1 Description

The bead units combine wire and rubber compounds to produce tire beads, which are utilized in the construction of tires. Rubber extruders and winders process the materials to form the tire beads. The operation is conducted in a batch mode as each bead is formed separately. The bead unit operation is divided into farm and passenger tires. Farm tires require the use of a solvent-based cement in bead manufacture. Passenger tire beads are made without cement.

Note: This narrative description is for informational purposes only and is not enforceable.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Bead Preparation Areas	Bead Preparation Machines #4 - #6	None

7.4.3 Applicable Provisions and Regulations

a. An “affected bead preparation machine” for the purpose of these unit-specific conditions, is an emission unit described in Conditions 7.4.1 and 7.4.2 above.

b. Each affected bead preparation machine identified in Condition 7.4.2 is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Each affected bead preparation machine identified in Condition 7.4.2 is subject to the following:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.4.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected bead preparation machine not being subject to requirements of 35 IAC 215.461 based on the exemption criteria for tires with an inside bead diameter more than 19.7 inches.

b. This permit is issued based on the affected bead preparation machine not being subject to requirements of 40 CFR 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry" either based on the exemption criteria for tires with an inside bead diameter more than 19.7 inches or construction/modification had occurred prior to January 20, 1983.

c. This permit is issued based on the affected bead preparation machines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected bead preparation machines do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.4.5 Control Requirements and Work Practices

a. Bead cementing operations are allowed to perform for tires with an inside bead diameter exceeding 19.7 inches and a cross section dimension more than 12.8 inches. For smaller tires bead cementing shall not be applied.

b. Condition 7.4.5(a) is established for purposes of maintaining exempt status from 35 IAC 215.461 (see also Condition 7.4.4(a)).

7.4.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6.1, the affected bead preparation machines are subject to the following:

a. Total emissions and operation of all bead preparation machines shall not exceed the following limits:

VOM Containing Material Usage		VOM Emissions	
(lb/mo)	(ton/yr)	(lb/mo)	(ton/yr)
7,931	47.6	7,693	46.2

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

b. The above limitations were established in Permit 79010006, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1].

7.4.7 Testing Requirements

Testing requirements are not set for the affected bead preparation machines.

7.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected bead preparation machines.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected bead preparation machines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Cement/Solvents (lb/month and lb/year);

b. VOM content of each cement/solvent applied (wt. %) and total VOM containing material usage (tons/month and tons/year);

c. If photochemical reactive VOM materials are used, the Permittee shall identify such materials and keep usage records of these materials per each bed preparation machine (tons/month and tons/year);

d. Records of tires being processed with an inside bead diameter less than 19.7 inches; and

e. Total monthly and annual emissions of VOM calculated based on the procedures established in Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected bead preparation machines with the permit requirements, 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:

Reporting of Deviations

Emissions of regulated air pollutants from the affected bead preparation machines in excess of the limits specified in Conditions 7.4.3 and 7.4.6 within 30 days of such occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected bead preparation machines.

7.4.12 Compliance Procedures

a. Compliance with VOM emission limit on Conditions 5.6.1 and 7.4.6 shall be determined and calculated based on the formula listed below:

VOM emissions (ton) = Pounds of Solvent Used (lb) x VOM Content (wt. %) x (1 ton/2000 lb)

b. If the VOM photochemical reactive materials are applied, compliance with VOM emission limit in Condition 7.4.3(c) shall be determined based on the records required by Condition 7.4.9(c) and the formula listed below:

VOM emissions (lb/hr) = Pounds of VOM Materials Used (lb)/ Hours of Operation of individual unit

c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.5 Green Tire Spray Booths

7.5.1 Description

The assembled uncured (green) tires are sprayed with a water-base inside tire lining and an organic solvent-base precure. Assembled uncured (green) passenger tires are sprayed with a water-based inside tire lining and a water-based precure. Both of which aid in tire curing.

Note: This narrative description is for informational purposes only and is not enforceable.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Construction Dates
Green Tire Spray Booths	Farm Spray Booths #1 – #4 (#1 sprays all tire diameters,>/<20 inches; ##2,3,4 spray tires with diameters >20 inches)	None	#1 – 2000; #2 – 1972; #3 – 1972; #4 - 1974
	Passenger Spray Booths #1, #5, #6 (##1,5,6 spray tires with diameters <20 inches and use water-base spray only)	None	#1 – 1991; #5 – 1972; #6 - 1981

7.5.3 Applicable Provisions and Regulations

a. An “affected spray booth” for the purpose of these unit-specific conditions, is an emission unit described in Conditions 7.5.1 and 7.5.2 above.

b. Each affected spray booth is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Passenger Spray Booth #1 is subject to the following requirements of 40 CFR Part 60, Subpart BBB:

40 CFR 60.542(a)(5):

For each green tire spraying operation where only water-based sprays are used:

i. Discharge into the atmosphere no more than 1.2 grams of VOC per tire sprayed with an inside green tire spray for each month; and

ii. Discharge into the atmosphere no more than 9.3 grams of VOC per tire sprayed with an outside green tire spray for each month.

d. Farm Spray Booth #1 is subject to the following requirements of 40 CFR Part 60, Subpart BBB:

40 CFR 60.542(a)(7):

For each green tire spraying operation where both water-based and organic solvent-based sprays are used:

i. Water-based sprays:

A. Discharge into the atmosphere no more than 1.2 grams of VOC per tire sprayed with a water-based inside green tire spray for each month; and

B. Discharge into the atmosphere no more than 9.3 grams of VOC per tire sprayed with a water-based outside green tire spray for each month; and.

ii. Solvent-based sprays:

Maintain total (uncontrolled) VOC use less than or equal to the levels specified below, depending upon duration of the compliance period:

A. 3,220 kilograms of VOC per 28 days;

B. 3,340 kilograms of VOC per 29 days;

C. 3,450 kilograms of VOC per 30 days;

D. 3,570 kilograms of VOC per 31 days; or

E. 4,030 kilograms of VOC per 35 days.

e. i. In lieu of complying with 35 IAC 215.462, the owner or operator of an emission source may utilize an

alternative volatile organic emission reduction system, including an alternative production process, which is demonstrated to be equivalent to 35 IAC 215.462 on the basis of emissions of volatile organic matter [35 IAC 215.463].

ii. The Permittee complies with this requirement by application of water-based or solvent-based sprays with identical limitation as described in Conditions 7.5.3(c) and (d) above.

f. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hour (8 lb/hour) from any emission unit, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material [35 IAC 215.301].

7.5.4 Non-Applicability of Regulations of Concern

a. Each affected spray booth (other than Passenger Spray Booth #1 and Farm Spray Booth #1, as identified in Condition 7.5.3(c) or (d) above) involved into green tire spraying operation performed on the tires that have a bead diameter more than 0.5 meter (19.7 inches) or constructed/modified prior to January 20, 1983 is not subject to requirements and emission standards of 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry", pursuant to definition of "tire" in 40 CFR 60.541(a) and criteria of applicability in 40 CFR 60.540(a).

b. Each affected spray booth involved into green tire spraying operation performed on the tires that have a bead diameter exceeding 19.7 inches and cross section dimension exceeding 12.8 inches is not subject to the emission standards of 35 IAC 215.462 and alternative standards of 35 IAC 215.463, pursuant to definition of "pneumatic rubber tire manufacture" in 35 IAC 211.4790.

c. This permit is issued based on the affected spray booths not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected spray booths do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.5.5 Control Requirements and Work Practices

Pursuant to 39.5(7)(a) of the Act, the affected spray booths are subject to the following:

a. Farm spray booth #1 is allowed to process (spray) all dimensional types of tires.

b. Any change of the mode of operation of the farm spray booths #2, 3 and 4 (switch to spraying tires having a bead diameter less than 19.7 inches) is required approval from the Illinois EPA and a revision of this permit.

7.5.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected spray booths are subject to the following:

Farm Spray Booth #1:

a. Total tire production shall not exceed 21,900 tires per month and 219,000 tires per year.

b. Emissions shall not exceed the following limits:

VOM		PM	
(ton/mo)	(ton/yr)	(ton/mo)	(ton/yr)
3.83	30.65	0.28	3.3

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 months total) [T1].

c. The above limitations were established in the permit 00010072, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1].

7.5.7 Testing Requirements

a. Pursuant to 40 CFR 60.543(b)(1), the owner or operator, who applies solvent-based sprays and complies with monthly uncontrolled VOC use (kg/mo) limit, shall conduct a performance test each month according to the procedures established below in this Condition.

b. For each green tire spraying operation where organic solvent-based sprays are used where the owner or operator seeks to comply with the uncontrolled monthly VOC use limits, the owner or operator shall use the following procedure (established under 40 CFR 60.543(c)) to determine compliance with the applicable (depending upon duration of compliance period) uncontrolled monthly VOC use limit specified under 40 CFR 60.542(a)(6)(ii) and (a)(7)(iv):

i. Determine the density and weight fraction VOC (including dilution VOC) of each cement or green tire spray from its formulation or by analysis of the cement or green tire spray using Method 24. If a dispute arises, the Administrator may require an

owner or operator who used formulation data to analyze the cement or green tire spray using Method 24.

ii. Calculate the total mass of VOC used at the affected facility for the month (M_o) by the following procedure:

A. For each affected facility for which cement or green tire spray is delivered in batch or via a distribution system that serves only the affected facility:

$$M_o = \sum_{i-1}^{a} L_{C_i} D_{C_i} W_{O_i}$$

Where:

a = The number of different cements or green tire sprays used during the month that are delivered in batch or via a distribution system that serves only a single affected facility

B. For each affected facility for which cement or green tire spray is delivered via a common distribution system that also serves other affected or existing facilities:

1. Calculate the total mass of VOC used for all of the facilities served by the common distribution system for the month (M}:

$$M = \sum_{i=1}^{b} L_{C_i} D_{C_i} W_{O_i}$$

Where:

b - The number of different cements or green tire sprays used during the month that are delivered via a common distribution system that also serves other affected or existing facilities

2. Determine the fraction (F_o) of M used at the affected facility by comparing the production records and process specifications for the material cemented or sprayed at the affected facility for the month to the production records and process specifications for the material

cemented or sprayed at all other facilities served by the common distribution system for the month or by another procedure acceptable to the Administrator

3. Calculate the total monthly mass of VOC used at the affected facility for the month (M_o):

$$M_o = MF_o$$

iii. Determine the time duration of the monthly compliance period (T_d).

c. Monthly performance tests (for Passenger Spray Booth #1 and Farm Spray Booth #1) shall be conducted as follows pursuant to 40 CFR 60.543(d):

i. For each green tire spraying operation where water-based sprays containing 1.0 percent, by weight, of VOC or more are used (inside and/or outside) that do not use a VOC emission reduction system, the owner or operator shall use the following procedure to determine compliance with the g/tire limit specified under 40 CFR 60.542(a)(5)(i) and (a)(5)(ii).

A. Determine the density and weight fraction VOC as specified under 40 CFR 60.543(c)(1).

B. Calculate the total mass of VOC used at the affected facility for the month (M_o) as specified under 40 CFR 60.543(c)(2).

C. Determine the total number of tires sprayed at the affected facility for the month (T_o) by the following procedure:

1. For a green tire spraying operation that uses water-based inside green tire sprays, T_o equals the number of green tires that receive an application of water-based inside green tire spray for the month.

2. For a green tire spraying operation that uses water-based outside green tire sprays, T_o equals the number of green tires that receive an application of water-based outside green tire spray for the month.

D. Calculate the mass of VOC used per tire sprayed at the affected facility for the month (G):

$$G = \frac{M_o}{T_o}$$

E. Calculate the mass of VOC emitted per tire sprayed at the affected facility for the month (N):

$$N = G$$

d. The owner or operator of each green tire spraying operation using only water-based sprays (inside and/or outside) containing less than 1.0 percent, by weight, of VOC is not required to conduct a monthly performance test as described in 40 CFR 60.543(d). In lieu of conducting a monthly performance test, the owner or operator of each green tire spraying operation shall submit formulation data or the results of Method 24 analysis annually to verify the VOC content of each green tire spray material, provided the spraying formulation has not changed during the previous 12 months. If the spray material formulation changes, formulation data or Method 24 analysis of the new spray shall be conducted to determine the VOC content of the spray and reported within 30 days as required under 40 CFR 60.546(j) [40 CFR 60.543(b)(4)].

e. In determining compliance for each green tire spraying operation, the owner or operator shall include only those tires defined under 40 CFR 60.541(a) when determining B_o [40 CFR 60.543(m)].

f. Description of applicable test methods is given in 40 CFR 60.547.

7.5.8 Monitoring Requirements

Monitoring requirements are not set for the affected spray booths.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected spray booths to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Each owner or operator of a green tire spraying operation subject to 40 CFR 60, Subpart BBB and using water-based sprays containing less than 1.0 percent by weight of VOC, as specified under 40 CFR 60.543(b)(4), shall maintain records of formulation data or the results of Method 24 analysis conducted to verify the VOC content of the spray [40 CFR 60.545(f)];

b. Each owner or operator of a green tires spraying operation where organic solvent-based sprays are used who seeks to comply with a specified VOC monthly usage limit shall maintain records of monthly VOC use and the number of days in each compliance period [40 CFR 60.545(d)];

c. Separate solvent usage for NSPS and non-NSPS units (gal/month and gal/year);

d. VOM content of each solvent applied (lb/gal);

e. Density of each solvent (lb/gal);

f. If photochemical reactive VOM materials are used, the Permittee shall identify such materials and keep usage records of these materials per each spray booth (tons/month and tons/year);

g. Number of tires processed (separately for NSPS and non-NSPS units), tires/month and tires/year;

h. Monthly and annual emissions of VOM generated by emission units identified in Condition 7.5.6 and calculated based on the procedures established in Condition 7.5.12;

i. Total monthly and annual emissions of VOM from all affected spraying booths calculated based on the procedures established in Condition 7.5.12; and

j. All records of the monthly performance tests shall be maintained, as specified under 40 CFR 60.543(b)(1).

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected spray booths with the permit requirements, 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. Reporting of Deviations

i. Emissions of regulated air pollutants from the affected spray booths in excess of the limits specified in Conditions 7.5.3 and 7.5.6(b) within 30 days of such occurrence.

ii. Production limits from the affected spray booth in excess of the limits specified in Condition 7.5.6(a) within 30 days of such occurrence.

b. Once every 6 months each owner or operator subject to the provisions of 40 CFR 60.545 shall report each monthly

average VOC emission rate that exceeds the g/tire limit specified under 40 CFR 60.542(a)(5) [40 CFR 60.546(f)(1)].

c. Once every 6 months each owner or operator subject to the provisions of 40 CFR 60.545 shall report each monthly average VOC use rate that exceeds the kg/mo VOC use limit specified under 40 CFR 60.542(a)(6)(ii) [40 CFR 60.546(f)(2)].

d. The owner or operator of each green tire spraying operation (inside and/or outside) using water-based sprays containing less than 1.0 percent, by weight, of VOC shall furnish to the Illinois EPA, within 60 days initially and annually thereafter, formulation data or Method 24 results to verify the VOC content of the water-based sprays in use. If the spray formulation changes before the end of the 12-month period, formulation data or Method 24 results to verify the VOC content of the spray shall be reported within 30 days [40 CFR 60.546(j)].

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected spray booths.

7.5.12 Compliance Procedures

a. Compliance with emission limits in Condition 7.5.3(c) and (d) shall be demonstrated through the testing procedures, recordkeeping and reporting requirements established in Condition 7.5.7, 7.5.9 and 7.5.10, respectively.

b. Compliance with the emission limits in Conditions 5.6 and 7.5.6 is addressed by the recordkeeping requirements established in Conditions 7.5.9 and the following equation:

VOM (ton) = Gallons of Solvent Used (gal) x VOM Content (lb/gal) x (1 ton/2,000 lb)

c. If the VOM photochemical reactive materials are applied, compliance with VOM emission limit in Condition 7.5.3(f) shall be determined based on the records required by Condition 7.5.9(f) and the formula listed below:

VOM emissions (lb/hr) = Pounds of VOM Materials Used (lb)/ Hours of Operation of individual unit

d. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.6 Curing Presses

7.6.1 Description

The assembled green tires are cured in presses.

Note: This narrative description is for informational purposes only and is not enforceable.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Curing Presses	Curing Presses: *Passenger* A1-A5 C 61-90; D 91-120; E 149-150; H 207-234; J 235-244; J 245-260; K 263-272; K-283-K288 *Farm* A1, A3-A7, A8-A10; B 1-5; B 6-9; C 1-6; C 7-12; C13; D 1-6; D7-11; D12; E1-12; E13; F1-10; F11; G1; G2-12; G13; H1-4; H5-H10; H11; H12-H13	None None

7.6.3 Applicable Provisions and Regulations

a. The “affected curing presses” for the purpose of these unit-specific conditions, is an emission unit described in Conditions 7.6.1 and 7.6.2 above.

b. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hour (8 lb/hour) from the affected curing presses, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material [35 IAC 215.301].

7.6.4 Non-Applicability of Regulations of Concern

a. Each affected curing press is not subject to requirements and emission standards of 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry" because no cementing or green tire spraying operations performed by affected curing presses.

b. Each affected curing press is not subject to requirements and emission standards of 35 IAC 215.461 and 215.462 because no cementing or green tire spraying operations performed by affected curing presses.

c. This permit is issued based on the affected curing presses not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected curing presses do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.6.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected curing presses.

7.6.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected curing presses are subject to the following:

a. i. Usage of material (uncured rubber) for 12 new affected curing presses Passenger A1-A2, K283-K288 & Farm A3-A7 shall not exceed 12,000 tons/year.

ii. VOM emissions from each affected new press described above shall not exceed 0.44 tons/year.

iii. Compliance with these limitations shall be determined from a running total of 12 months of data [T1].

iv. The above limitations were established in the construction permit 08060019, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1].

b. Emissions of VOM attributable to use of organo-silane coupling agents in the affected Banbury mixers and affected curing presses shall not exceed the following limits:

VOM Emissions	
Tons/Month	Tons/Year
30.0	287.3

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) T1].

c. The above limitations were established in the PSD Permit 01040070, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1].

7.6.7 Testing Requirements

a. If the Permitee decides to rely on a loss factor for generation of VOM from use of organo-silane coupling agents that is lower than 0.194 lbs per pound as specified in Condition 7.2.6(b), the Permittee shall conduct testing of VOM emissions from the affected Banbury mixers and affected curing presses while using organo-silane coupling agents measured at the Permittee's expense by an approved testing service, to confirm that such lower factor is representative for this source. This condition is established pursuant to section 39.5(7)(c) of the Act.

b. The following methods and procedures shall be used for testing of emissions, as approved by the Illinois EPA. Refer to 40 CFR 60, Appendix A for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Flue Gas Weight	USEPA Method 3
Moisture	USEPA Method 4
Volatile Organic Material	USEPA Method 18, 25 or 25A, as appropriate

c. The Permittee shall submit a written test plan to the Illinois EPA for its approval for the initial testing for VOM and if a significant change in the procedures for this testing is planned from the procedures followed in the previous test. This plan shall be submitted at least 90 days prior to the actual date of testing and include the following information as a minimum:

i. A description of the planned test procedures.

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

iii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions.

iv. The methodology that will be used to determine the operating rate during the period of testing, e.g., the rate of coupling introduced to the process.

d. The Permittee shall notify the Illinois EPA prior to conducting these measurements to enable the Illinois EPA to observe testing. Notification for the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may accept shorter advance notice if it does not interfere with the Illinois EPA's ability to observe testing.

e. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 30 days after the test results are compiled and finalized.

f. The Final Report from testing shall include as a minimum:

i. A summary of results.

ii. General Information.

iii. A detailed description of methodology for determination of the rate of VOM introduced into processes during the period of testing, with supporting information.

iv. Detailed description of operating conditions of the emission unit(s) being tested, including:

A. Process information, e.g. type and amount of rubber processed and organo-silane content; and

B. All other relevant control equipment information, i.e., equipment condition and operating parameters during testing.

v. Data and calculations.

vi. Conclusions.

7.6.8 Monitoring Requirements

Monitoring requirements are not set for the affected curing presses.

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected curing presses to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. VOM emission factor for the combined operation of the affected Banbury mixers and affected curing presses expressed as lb VOM per lb of silane coupler processed, with supporting calculations.

b. Amount of uncured rubber used for the new affected curing presses

c. Total emissions of VOM for all affected Banbury mixers and curing presses, as calculated based on the procedures established in Condition 7.6.12.

d. Pursuant to construction permit 08060019, the Permittee shall maintain the following records related to applicability of PSD pursuant to 40 CFR 52.21(r)(6):

i. A copy of the permit application as it includes the following information and any revision to the following information:

A. A description of the project.

B. Identification of regulated PSD pollutants other than VOM for which emissions could be affected by the project.

C. A description of the applicability test used to determine that the project is not a major modification for VOM and any other regulated PSD pollutant that could be affected by the project including the baseline actual emissions, the projected actual emissions, and the amount of emissions excluded under 40 CFR 52.21(b)(41)(ii)(c) and an explanation for why such amount was excluded.

ii. For emissions of VOM (and any other regulated PSD pollutant that could increase as a result of the project) a record of the annual emissions of the source in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected curing presses with the permit requirements, 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. Pursuant to construction permit 08060019, the Permittee shall submit a report to the Illinois EPA and USEPA if the

annual emissions, in tons per year, from the project identified in 40 CFR 52.21(r)(6)(i) (See also Condition 7(a) of the permit 08060019), exceed the baseline actual emissions, as documented and maintained pursuant to 40 CFR 52.21(r)(6)(i)(c), by a significant amount as defined in 40 CFR 52.21(b)(23) for that regulated PSD pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to 40 CFR 52.21(r)(6)(i)(c). Such report shall be submitted to the Illinois EPA and USEPA within 60 days after the end of such year. The report shall contain the following [40 CFR 52.21(r)(6)(v)]:

i. The name, address and telephone number of the major stationary source.

ii. The annual emissions as calculated pursuant to 40 CFR 52.21(r)(6)(iii).

iii. Any other information that the Permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

Note: The above requirements are established to address applicability of 40 CFR 52.21, the federal rules for Prevention of Significant Deterioration of Air Quality (PSD).

b. Reporting of Deviations

i. Emissions of regulated air pollutants from the affected curing presses in excess of the limits specified in Condition 7.6.3 within 30 days of such occurrence.

ii. Operation of the affected curing presses in excess of production and emission limits specified in Condition 7.6.6 within 30 days of such occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected curing presses.

7.6.12 Compliance Procedures

a. Compliance with the emission limits in Conditions 5.6 and 7.5.6 is addressed by the recordkeeping and reporting established in Conditions 7.5.9 and 7.5.10 and the following emission factors listed below:

Compliance with the emission limits in Conditions 5.6.1 and 7.6.6(a) and (b) is addressed by the recordkeeping, testing

and reporting requirements required in Conditions 7.6.9. 7.6.7 and 7.6.10 and the emission factor listed below (this factor shall represent maximum theoretical generation of VOM from the reaction of the most volatilizing organo-silane coupler with the rubber matrix):

For the proposed coupling agents, this yields a factor of:

E_{BMCE} = 0.194 x lbs of silane coupler used

Where the emission factor of 0.194 lb/VOM for each lb of silane coupler developed in conjunction with studies performed by the Rubber Manufacturing Association.

b. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.7 Boilers

7.7.1 Description

Natural gas-fired boilers used to produce heat and steam for the source needs.

Note: This narrative description is for informational purposes only and is not enforceable.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Boilers	Two Boilers (##3 & 4) With a Maximum Heat Input Capacity Equal to 74.6 mmBtu/hr Each; One Boiler (#2) With a Maximum Heat Input Capacity Equal to 78.4 mmBtu/hr	None

7.7.3 Applicable Provisions and Regulations

a. The “affected boiler” for the purpose of these unit-specific conditions, is a boiler described in Conditions 7.7.1 and 7.7.2 above.

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 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected 50 percent excess air [35 IAC 216.121].

c. No person shall cause or allow the emissions of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

7.7.4 Non-Applicability of Regulations of Concern

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

b. Pursuant to 35 IAC 215.303, any fuel combustion emission unit is not subject to 35 IAC Part 215, Subpart G: Use of Organic Material.

c. This permit is issued based on the affected boilers not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.7.5 Control Requirements and Work Practices

a. Each affected boiler shall only be operated with natural gas as the fuel.

b. The affected boilers shall be operated in accordance with manufacturer's specifications and/or operating procedures developed by the source.

c. Conditions 7.7.5(a) and (b) above are established in accordance with requirements of 39.5(7)(a) of the Act.

7.7.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6.1, the affected boilers are subject to the following:

a. Total natural gas usage for all affected boilers shall not exceed 650 million scf/year.

b. Total emissions for all affected boilers shall not exceed the following limits:

Pollutant	Lbs/Hour	Tons/Year
NO_x	23.1	32.7
CO	19.5	27.5
VOM	1.2	1.8
PM/PM_{10}	1.8	2.5

Compliance with annual limits shall be determined from a running total of 12 months of data [T1].

These limits are based on the maximum operating rate and standard emission factors established in AP-42.

d. The above limitations were established in permit 95010051, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1].

7.7.7 Testing Requirements

Testing requirements are not set for the affected boilers.

7.7.8 Monitoring Requirements

Monitoring requirements are not set for the affected boilers.

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Natural gas consumption (scf/mo and scf/yr);

b. Emissions from the affected boilers calculated in accordance with compliance procedures of Condition 7.7.12.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected boilers with the permit requirements, 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:

Reporting of Deviations

a. Emissions of regulated air pollutants from the affected boilers in excess of the limits specified in Condition 7.7.3 within 30 days of such occurrence.

b. Operation of the affected boilers in excess of emission limits specified in Condition 7.7.6 within 30 days of such occurrence.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boilers.

7.7.12 Compliance Procedures

a. Compliance with Condition 7.7.3(b) and (c) shall be achieved by implementation of requirements specified in Condition 7.7.5.

b. Compliance with the emission limits in Conditions 5.6.1 and 7.7.6 is addressed by the recordkeeping and reporting established in Conditions 7.7.9 and 7.7.10 and the following emission factors:

Pollutant	Emission Factor ($lb/10^6 ft^3$)
PM	7.6

NO_x	100.0
SO_2	0.6
VOM	5.5
CO	84.0

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

Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.8 Turbines

7.8.1 Description

Three natural gas fired turbines are used as needed for electric power generation for facility needs. Turbines are equipped with a CoGen system that generates steam for facility use.

Note: This narrative description is for informational purposes only and is not enforceable.

7.8.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Turbines	Three Stationary Gas Turbines (Heat Input Capacity - 55.3 mmBtu/hr Each)	None

7.8.3 Applicable Provisions and Regulations

a. The “affected turbine” for the purpose of these unit-specific conditions, is an emission unit described in Conditions 7.8.1 and 7.8.2 above.

b. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hour (8 lb/hour) from an affected turbine, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall only apply to photochemically reactive material [35 IAC 215.301].

c. i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minutes period, provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such

person, and provided further that such emission unit shall be limited to 3 times in any 24 hours [35 IAC 212.123].

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm. [35 IAC 214.301]

e. The affected turbines are subject to the following emission standards for sulfur dioxide and nitrogen oxide established in 40 CFR Part 60, Subpart GG "Standards of Performance for Stationary Gas Turbines":

i. SO_2

No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis [40 CFR 60.333(a)].

ii. NO_x

Pursuant to 40 CFR 60.332(a)(2) and 60.332(c), no owner or operator of an affected gas turbine with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 million Btu/hour) but less than or equal to 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired shall cause to be discharged into the atmosphere from such gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.015\frac{(14.4)}{Y} + F$$

Where:

STD = Allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = Manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen calculated from the nitrogen content of the fuel as follows:

Fuel-Bound Nitrogen (Percent by Weight)	F (NO_x Percent by Volume)
$N \leq 0.015$	0
$0.015 < N \leq 0.1$	0.04 (N)
$0.1 < N \leq 0.25$	0.04 + 0.0067(N - 0.1)
$N > 0.25$	0.005

Where:

N = The nitrogen content of the fuel (percent by weight).

7.8.4 Non-Applicability of Regulations of Concern

a. The affected turbines are not subject to the requirements of 35 IAC 212.321 because they do not have a process weight rate as defined in 35 IAC 211.5250.

b. The affected turbines are not subject to 35 Ill. Adm. Code 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected turbines are not by definition fuel combustion emission units.

c. The affected turbines are not subject to 35 Ill. Adm. Code 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected turbines are not by definition fuel combustion emission units.

d. This permit is issued based on the affected turbines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected turbines do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.8.5 Control Requirements and Work Practices

a. The affected turbines shall only be operated with natural gas as the fuel.

b. The affected turbines shall be operated in accordance with manufaturer's specifications and/or site-specific operating manuals.

c. Conditions 7.8.5(a) and (b) above are established in accordance with requirements of 39.5(7)(a) of the Act.

7.8.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected turbines are subject to the following:

a. Total annual natural gas consumption for all affected turbines shall not exceed 1,480 million cubic feet.

b. Total emissions from all affected turbines shall not exceed the following limits:

EMISSIONS							
PM_{10}		CO		VOM		NO_x	
Lb/mmBtu	T/yr	Lb/mmBtu	T/yr	Lb/mmBtu	T/yr	Lb/mmBtu	T/yr
0.0236	17.45	0.121	89.48	0.024	17.75	0.099	73.21

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) [T1].

These limits are based on the maximum operating rate and considering continuous year round operations.

c. The above limitations were established in permit 95010051, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) [T1].

7.8.7 Testing Requirements

a. For gas turbines, the owner or operator shall determine compliance with the sulfur content standard in 40 CFR 60.333(b) by using ASTM D 1072-80,D 3031-81,D 4084-82, or D 3246-81, pursuant to 40 CFR 60.335(d).

b. To compute the nitrogen oxides emissions, the owner or operator shall use analytical methods and procedures that are accurate to within 5 percent and are approved by the Administrator to determine the nitrogen content of the fuel being fired

c. The owner or operator shall determine compliance with the nitrogen oxides and sulfur dioxide standards in 40 CFR 60.332 and 60.333(a) as follows:

The nitrogen oxides emission rate (NO_x) shall be computed for each run using the following equation:

$$NO_x = (NO_{xo})\ (P_r/P_o)^{0.5} e^{19(Ho-0.00633)}\ (288°K/T_a)^{1.53}$$

Where:

NO_x = Emission rate of NO_x at 15 percent O2 and ISO standard ambient conditions, ppm by volume

NO_{xo} = Observed NO_x concentration, ppm by volume at 15 percent O_2

P_r = Reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg

P_o = Observed combustor inlet absolute pressure at test, mm Hg

H_o = Observed humidity of ambient air, g H_2O/g air.

e = Transcendental constant, 2.718

T_a = Ambient temperature, °K

d. The tests described above shall be done once in five years prior the expiration date of this permit and be submitted to the Illinois EPA with the renewal of this permit. Testing shall be done in accordance with Conditions 7.8.7(a),(b),(c), 8.5 and 8.6 of this permit.

7.8.8 Monitoring Requirements

The owner or operator of any stationary gas turbine subject to the provisions of this subpart shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of determination of these values shall be as follows:

If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Illinois EPA before they can be used to comply with 40 CFR 60.334(b).

7.8.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the

affected turbines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. The operating parameters of the turbines, as related to conduction of the testing procedures described in Condition 7.8.7;

b. Natural gas consumption (scf/month and scf/yr);

c. Nitrogen content and sulfur content of the fuel based on the quarterly data and provisions described in Condition 7.8.8;

d. Monthly and annual emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.8.12; and

e. Manufacturer's specifications and/or operating manuals.

7.8.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected turbines with the permit requirements, 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:

Reporting of Deviations

a. Emissions of regulated air pollutants from the affected turbines in excess of the limits specified in Condition 7.8.3 within 30 days of such occurrence.

b. Operation of the affected turbines in excess of emission limits specified in Condition 7.8.6 within 30 days of such occurrence.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected turbines.

7.8.12 Compliance Procedures

a. Compliance with Condition 7.8.3 shall be determined by the testing, monitoring, recordkeeping and reporting established in Condition 7.8.7, 7.8.8, 7.8.9 and 7.8.10, respectively.

b. Compliance with the emission limits in Conditions 5.6 and 7.8.6 is addressed by the recordkeeping and reporting established in Conditions 7.8.9 and 7.8.10 and the following emission factors listed below:

Compliance with the emission limits shall be determined using representative emission factors developed from site-specific emission testing (PM-10, NO_x, CO) and USEPA emission factors (VOM). For this purpose, the following emission factors shall apply unless and until superseded by more recent data: 0.0022 lb/mmBtu for PM-10, 0.0223 lb/mmBtu for CO, 0.024 lb/mmBtu for VOM and 0.0723 lb/mmBtu for NO_x.

c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

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 (TO BE DETERMINED), 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 that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. 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. This notice shall:

i. Describe the physical or operational change;

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

iii. 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;

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

v. 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. 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 Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, pursuant to Condition 7.1.10(a)(iii):

Monitoring Period	Report Due Date
September 16 – March 15	Within 60 days after the reporting period
March 16 – September 15	Within 60 days after the reporting period

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 determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;

e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.

b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

iv. USEPA Region 5 - Air Branch

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

c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

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.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

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, pursuant to Section 39.5(7)(j) and (p) of the Act, 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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (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 applicable requirements; or

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

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; 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 authorized by this permit.

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. At 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 including any logs, plans, procedures, or instructions required to be kept 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, Air Quality Planning 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 Unit, 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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

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 [Section 39.5(7)(k)(iv) of the Act].

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, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, 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 that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

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

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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and 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

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 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: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

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

a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

b. 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)].

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

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

Where:

P = Process weight rate

E = Allowable emission rate

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

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

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

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

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

Metric		English	
P	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

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

a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

b. The emissions of particulate matter into the atmosphere in any one hour period from the affected

unit shall not exceed the allowable emission rates specified in the following equation:

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

Where:

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

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

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

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

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

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

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00

32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Attachment 3 - Compliance Assurance Monitoring (CAM) Plan

Not applicable to this source

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf
www.epa.state.il.us/air/permits/197-fee.pdf

AB:psj