217/782-2113

RENEWAL
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Eakas Corporation
Attn: Jeff Wagner, Plant Manager
31st Road and U.S. Route 251
Peru, Illinois 61354

I.D. No.: 099085ABL
Application No.: 97060012

Date Received: April 17, 2007
Date Issued: September 6, 2011
Expiration Date[1]: September 6, 2016

Operation of: Automotive Plastic Parts Coating
Source Location: 6251 Route 251, Peru, LaSalle County, 61354
Responsible Official: Tom Mori, President

This permit is hereby granted to the above-designated Permittee to OPERATE a automotive plastic parts coating facility, 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 Kaushal Desai at 217/782-2113.

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

ECB:KKD:psj

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

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

Eakas Corporation
6251 Route 251
Peru, Illinois 61354
815/223-8811

I.D. No.: 099085ABL
Standard Industrial Classification: 3714, Motor Vehicle Parts and Accessories

1.2 Owner/Parent Company

Sakae Riken Kogyo Co., Ltd.
Japan

1.3 Operator

Eakas Corporation
31st Road and U.S. Route 251
Peru, Illinois 61354

Jeff Wagner, Plant Manager
815/223-8811

1.4 General Source Description

The Eakas Corporation is located at 6251 Route 251 in Peru, Illinois. The source manufactures plastic automotive parts. The plastic automotive parts will be coated with a coating to provide a decorative or protective finish.

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/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
GHG	Green House Gases
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
MACT	Maximum Achievable Control Technology
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Glue Machines

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

Injection Molding Machines

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

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

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

3.2 Compliance with Applicable Requirements

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

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

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit’s process

weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

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

3.3 Addition of Insignificant Activities

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

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

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
L Coating Line	Coating Line	June 1990	Waterwash Chamber, Regenerative Thermal Oxidizer
RW Coating Line	Coating Line	June 1990	Waterwash Chamber
HG Coating Line	Coating Line	November 2000	Waterwash Chamber, Catalytic Oxidizer
Compact Line	Coating Line with Oven	March 2005	Waterwash Chamber, Concentrator/Catalytic Oxidizer
Compact Line C-2	Coating Line with Oven	2007	Waterwash chamber; concentrator and catalytic oxidizer

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

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 Applicable Regulations

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

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

5.3.3 Fugitive Particulate Matter Operating Program

a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with the fugitive particulate matter operating program, submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph b below.

b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements

set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.3.4 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.

5.3.5 Risk Management Plan

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

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

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

5.3.6 Future Emission Standards

a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by

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

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

5.3.7 Episode Action Plan

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

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

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

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

i. Illinois EPA, Compliance Section; and

5.4 Non-Applicability of Regulations of Concern

None

5.5 Source-Wide Operational and Production Limits and Work Practices

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

None

5.6 Source-Wide 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 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	370.60
Sulfur Dioxide (SO_2)	0.13
Particulate Matter (PM)	2.21
Nitrogen Oxides (NO_x)	21.43
HAP, not included in VOM or PM	20.00
Total	414.40

5.6.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 8.0 tons/year for each individual HAP and 20 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). The above limitation was established in Permit 07040029 [T1]. This condition is being imposed so that the source is not a major source of HAP emissions and the requirements of 40 CFR Part 63 Subpart PPPP do not apply to the source. The Permittee shall fulfill the applicable testing and recordkeeping, requirements of Conditions 5.7.25.7 and 5.8.2.

5.6.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 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. Testing requirements are also set forth in Condition 7.1.7

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 7.2 tons of a single HAP or 18 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 limits in 5.7.2(a) were exceeded shall be based on records and procedures in Conditions 5.8.3 and 7.1.9 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 General Recordkeeping Requirements

5.8.1 Emission Records

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

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

5.8.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

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

5.8.3 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 5.8.3(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 7.1.9. 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 General Reporting Requirements

5.9.1 General Source-Wide Reporting Requirements

a. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:

i. Requirements in Condition 5.3.2 and 5.3.3

ii. Requirements in Condition 5.6

b. All such deviations shall be summarized and reported as part of the semiannual monitoring report required by Condition 8.6.1.

c. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the semiannual monitoring reports required by in Condition 8.6.1.

d. All required deviation reports described in Condition 5.9.1 above shall contain the following information:

i. Date and time of the deviation;

ii. Emission units(s)/operation involved;

iii. The duration of the event;

iv. Probable cause of the deviation;

v. Any corrective actions or preventative measures taken;

5.9.2 Annual Emissions Report

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

5.10 General Operational Flexibility/Anticipated Operating Scenarios

None

5.11 General Compliance Procedures

5.11.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.6 shall be based on the recordkeeping and reporting

requirements of Conditions 5.7 and 5.8, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Coating Lines L, RW, Compact, and HG
Control: Waterwash Chamber, Concentrator/Catalytic Oxidizer

7.1.1 Description

Unfinished plastic automotive fittings and parts are painted (primed, base coated, and clear coated) with a variety of coatings. Coating is principally applied in the paint booths via spray robots. Coated parts are conveyed to an electric curing oven to be heat dried.

The compact line and HG line have the option to use a zeolite rotary concentrator and catalytic oxidizer for the control of volatile organic material (VOM) emissions from the drying process. The L line has the option to use a regenerative thermal oxidizer for the control of VOM emissions from the drying process. On each line, particulate matter generated during coating application are exhausted through a water wash chamber.

L-Line

Coating material is principally applied on to the substrates in the paint booths via spray robots. Coated substrates are conveyed to a curing oven to be heat dried. VOM emissions from the drying process are destroyed in a regenerative thermal oxidizer. Particulate matter generated during curing operations are exhausted through a waterwash chamber.

HG-Line

Plastic substrates are cleaned, treated to remove static charge, and coated with primer using a spray booth. Primed parts enter a curing oven which is controlled by a zeolite rotary concentrator and catalytic oxidizer. A hydro graphics film is sprayed with a thinner which promotes adhesion and a protective coating, is applied in a dip tank with exhaust vented to the zeolite rotary concentrator and catalytic oxidizer. Dipped parts proceed to a high-pressure washer area to remove excess film prior to curing. Following curing, parts are touched up, clear coated, and cured in a drying oven. The oven exhaust and VOM from the thinner applied is exhausted to the zeolite rotary concentrator and catalytic oxidizer.

RW Line

Plastic automotive substrates are coated on the RW-Line. The applied coating material remaining on the substrate is heat dried in the curing oven and exhausted to atmosphere.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Compact Line	Coating Line with Oven	Waterwash Chamber, Concentrator/Catalytic Oxidizer
L Line	Coating Line with Oven	Waterwash Chamber, Catalytic Oxidizer
RW Line	Coating Line with Oven	Waterwash Chamber
HG Line	Coating Line with Ovens	Waterwash Chamber, Concentrator/Catalytic Oxidizer
Compact Line C-2	Coating line with Oven	Waterwash chamber; concentrator & catalytic oxidizer

7.1.3 Applicability Provisions and Applicable Regulations

a. The "affected coating line" for the purpose of these unit-specific conditions, is a coating line as described in Conditions 7.1.1 and 7.1.2.

b. Reserved for future use

c. The individual emission sources in the affected lines (spray booth and oven) shall comply with the organic material standards of 35 IAC Part 215, Subpart K: Use of organic material, as further set forth below:

   i. Option 1: No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided by the following exception: If no odor nuisance exists this limitation shall apply only to photochemically reactive material; or

   ii. Option 2: Emissions shall be controlled by a combustion type control device so as to convert 85 percent of the hydrocarbons to carbon dioxide and water.

d. The affected coating lines are subject to 35 IAC 212.321(b)(1), which provides that the Permittee shall not 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 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)].

e. 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 the affected coating lines other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

f. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected coating lines not being subject to 35 IAC 215.204, because the plastic parts are exempt.

b. The affected coating lines are not subject to 40 CFR Part 63, Subpart PPPP, because the affected source has enforceable limits in Condition 5.6.2 that limit HAP emissions to below major source threshold.

7.1.5 Control Requirements and Work Practices

a. If the Permittee elects to operate an oxidizer on the affected lines to comply with 35 IAC Part 215, Subpart K Option 2 (Condition 7.1.3(c)(ii)):

i. A. The rotary concentrator and catalytic oxidizer system shall be operated to achieve at least 85% overall control (combination of capture and control) of the VOM.

B. The regenerative thermal oxidizer shall be operated to achieve at least 85% overall control (combination of capture and control) of the VOM.

b. i. The regenerative thermal oxidizer and catalytic oxidizer (“oxidizers”) combustion chambers shall be preheated to at least the manufacturer’s recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, before the affected coating lines are begun. This temperature shall be maintained during operation of the affected coating lines.

ii. A. The catalytic oxidizer shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the inlet temperature and the temperature rise across each catalytic oxidizer bed.

B. The regenerative thermal oxidizer shall be equipped with a continuous temperature indicator and strip chart recorder or disk

storage for the oxidizer's combustion chamber temperature.

c. For the L-Line, no more than 30% of the VOM emissions shall be sent to the waterwash chamber (i.e., at least 70% of the VOM emission from the L-Line will be controlled by the regenerative thermal oxidizer).

7.1.6 Production and Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.6, the affected coating lines are subject to the following:

a. Emissions from the L Line and RW Line shall not exceed the following limits:

VOM Emissions (Tons/Month)	VOM Emissions (Tons/Year)
24.9	249.0

b. Emissions from the HG Line shall not exceed the following limits:

VOM Emissions (Tons/Month)	VOM Emissions (Tons/Year)
4.9	49.0

c. Emissions from the Compact Line shall not exceed the following limits:

VOM Emissions (Tons/Month)	VOM Emissions (Tons/Year)
3.9	39.0

d. This permit is issued based on minimal emissions of particulate matter from the affected lines. For this purpose, emissions from each such unit shall not exceed the nominal emission rate of 1.0 tons per year.

e. The affected coating lines shall not exceed the following limits:

i. The volatile organic material content of coatings used on the affected lines, as applied, shall not exceed 5.75 lb/gallon (weighted monthly average).

ii. The usage of coating, as applied, on the L Line and RW Line shall not exceed 8,661 gallons per month and 86,608 gallons per year, total.

iii. The volatile organic material content of thinner used for purging and cleaning, i.e., flushing thinner, shall not exceed 6.88 lb/gallon (weighted monthly average).

iv. The usage of coating, as applied, on the HG Line shall not exceed 1,704 gallons per month and 17,043 gallons per year.

v. The usage of coating, as applied, on the Compact Line shall not exceed 1,357 gallons per month and 13,565 gallons per year.

vi. The usage of flushing thinner on the L-Line and RW-Line for purging and cleaning shall not exceed 11,000 gallons per month and 116,613 gallons per year.

vii. The Permittee shall recycle all of the flushing thinner in the process. As a consequence, there shall be no VOM emissions associated with the flushing thinner.

f. The above limitations were established in Permit 04090058, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

g. Emissions from the Compact Line 2 shall not exceed the following limits:

VOM Emissions (Tons/Month)	VOM Emissions (Tons/Year)
3.2	32.0

h. i. The VOM content of coatings used on Compact Line 2 as applied, shall not exceed 4.90 lbs/gallon (weighted monthly average).

ii. The usage of coating, as applied, on Compact Line 2 shall not exceed 1,310 gallons per month and 13,060 gallons per year.

i. Emissions of HAPs from the affected lines shall not exceed 8.0 tons per year of individual HAPs and 20.0 tons per year for total HAPs.

j. The above limitations for Compact Line 2 were established in Permit 07040029, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that

the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

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

7.1.7 Testing Requirements

a. The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A. For gaseous nonmethane organic emissions as carbon, the volatile organic content shall be determined by Method 25, 40 CFR Part 60, Appendix A.

Any alternate test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].

b. Transfer efficiency shall be determined by a method, procedure or standard approved by the USEPA, under the applicable new source performance standard or until such time as USEPA has approved and published such a method, procedure or standard, by any appropriate method, procedure or standard approved by the Illinois EPA [35 IAC 215.208(b)].

c. Upon a written request from the Illinois EPA, the Permittee shall conduct tests in accordance with the procedures of 35 IAC 215.102 to measure the overall control and performance of the oxidizers controlling the affected coating lines. 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 [Section 39.5(7)(b) of the Act].

7.1.8 Monitoring Requirements

a. Compliance Assurance Monitoring (CAM) Requirements

The affected coating lines are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3, Tables 3.1-3.4 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application.

b. The Permittee shall install, calibrate, maintain, and operate continuous monitoring equipment which will monitor the VOM concentration of the zeolite concentrator exhaust, according to vendor specifications at all times the zeolite concentrator is in use, pursuant to Section 39.5(7)(a) of the Act.

c. The Permittee shall inspect and maintain the waterwash chamber on a monthly basis pursuant to Section 39.5(7)(a) of the Act.

d. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform semi-annual inspections of the paint spray booth ovens to ensure that the ovens and associated equipment is functioning properly in accordance with manufacturer's specifications or procedures established by the Permittee.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.7, the Permittee shall maintain records of the following items for the affected coating lines to demonstrate compliance with Conditions 5.5.1, 7.1.5, 7.1.6, and 7.1.7, pursuant to Section 39.5(7)(b) of the Act:

a. The following records for the emission sources in the affected lines related to compliance with 35 IAC Part 215, Subpart K:

i. When complying with 35 IAC Part 215, Subpart K using Option 1 (see Condition 7.1.3(c)(i)), the Permittee shall maintain:

A. A file containing calculations for the maximum organic material emissions that could be emitted in any continuous one hour period for each emission source (See also Condition 7.1.3(d)).

B. If the Permittee chooses to use the exception for emissions of organic material that are not

photochemically reactive, as defined in 35 IAC 211.4690, in 35 IAC Part 215.301 and Condition 7.1.3(c)(i), the Permittee shall maintain a file which identifies which coatings whose organic material emissions are not photochemically reactive, with supporting documentation.

ii. When complying with 35 IAC Part 215, Subpart K using Option 2 (see Condition 7.1.3(c)(ii)), the Permittee shall collect and record all of the following information each day for the oxidizer:

A. Monitoring data for inlet temperature and temperature rise across the catalyst bed for the catalytic oxidizer;

B. Monitoring data for the regenerative thermal oxidizer combustion chamber;

C. A log of the operating time for the capture systems, oxidizer, monitoring device and the associated coating line;

D. A maintenance log for the capture system, oxidizer and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages;

b. The following operational records for the affected lines:

i. Usage of each material used on each coating line (gallons/month and gallons/year);

ii. VOM and HAP content of each material used (lb/gallon, less water);

iii. VOM emissions from each affected line (tons/month and tons/year); and

iv. HAP emissions from the affected lines (tons/month and tons/year).

c. The Permittee shall maintain the following records to demonstrate good operating practices and procedures for the waterwash chamber and curing ovens:

i. Records for monthly inspections of the waterwash chamber with date and the nature of the inspection.

ii. Records for semi-annual inspections of the curing ovens with date and nature of the inspection.

iii. The Permittee shall also keep on file a document from the gas company certifying the sulfur content in the supplied natural gas does not exceed 2000 ppm.

7.1.10 Reporting Requirements

a. i. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations by the affected coating lines from applicable requirements, as follows:

A. Requirements in Condition 7.1.3(c) through (f)

B. Requirements in Condition 7.1.5

C. Requirements in Condition 7.1.6

ii. All such deviations shall be summarized and reported as part of the semiannual monitoring report required by Condition 8.6.1.

iii. The Permittee shall notify the Illinois EPA of all other deviations as part of the semiannual monitoring reports required by Condition 8.6.1.

iv. All deviation reports required by Condition 7.1.10(a) above shall contain the following:

A. Date, time and duration of the deviation;

B. Description of the deviation;

C. Probable cause of the deviation; and

D. Any corrective action or preventive measures taken.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

a. Compliance with Condition 7.1.3(c) (35 IAC 215 Subpart K) shall be demonstrated by meeting the operating requirements in Condition 7.1.5 and the recordkeeping requirements in Condition 7.1.9.

b. Compliance with Condition 7.1.3(d) shall be demonstrated by meeting the operating requirements in Condition 7.1.6 and the recordkeeping requirements in Condition 7.1.9.

c. Compliance with Condition 7.1.3(e) shall be demonstrated by meeting the monitoring requirements in Condition 7.1.8(c) and the recordkeeping requirements in Condition 7.1.9.

d. Compliance with the production and emission limits established in Condition 7.1.6 shall be based on the operating practices of Condition 7.1.5, the recordkeeping requirements in Condition 7.1.9 and formulas listed below:

e. Controlled Operations:

$$E = U \times C \times (1-K)$$

Where:

E = Emissions of VOM or HAP (pounds)

U = Material usage (gallons)

C = VOM or HAP content of the material used (lbs/gallon)

K = Overall control device efficiency (percent), if used appropriately

f. Uncontrolled Operations:

$$E = U \times C$$

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 September 6, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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].

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes 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. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required

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

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

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

8.6.2 Test Notifications

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

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

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

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

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

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

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

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

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The

test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

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

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

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

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

e. Obtain and remove samples of any discharge or emission of pollutants 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. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining

the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit

application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - 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

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

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

ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

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

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

B. FOR PROCESS WEIGHT RATE GREATER THAN OR EQUAL TO 408 MG/HR (450 T/HR):

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

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

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

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

i. 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 [35 IAC 212.322(a)].

ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

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

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

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

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

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

iii. 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	0.2	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	18.15	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

Table 3.1 PSEU Designation:	Compact Line
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators:	#1: Inlet Temperature and Temperature Change

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Measure inlet temperature and temperature change
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Establish minimum/maximum temperatures: Minimum catalyst inlet temperature: 65°F* Temperature change * Measured before pre-heater.
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	5% of operating days out of range

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Thermocouples located before and after catalyst bed
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Thermocouple and recorder checked on an annual basis
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Checking monitoring data daily and monitor performance annually
THE MONITORING FREQUENCY:	Continuous
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Temperatures recorded on strip chart recorder
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	One hour

Table 3.2 PSEU Designation:	HG Line
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators:	#1: Inlet Temperature and Temperature Change

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Measure inlet temperature and temperature change
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Establish minimum/maximum temperatures: Minimum catalyst inlet temperature: 65°F* Temperature change * Measured before pre-heater
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	5% of operating days out of range

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Thermocouples located before and after catalyst bed
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Thermocouple and recorder checked on an annual basis
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Checking monitoring data daily and monitor performance annually
THE MONITORING FREQUENCY:	Continuous
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Temperatures recorded on strip chart recorder
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	One hour

Table 3.3 PSEU Designation:	L Line
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators:	#1: Inlet Temperature and Temperature Change

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Measure inlet temperature and temperature change
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Establish minimum/maximum temperatures: Minimum catalyst inlet temperature: 65°F* Temperature change * Measured before pre-heater
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	5% of operating days out of range

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Thermocouples located before and after catalyst bed
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Thermocouple and recorder checked on an annual basis
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Checking monitoring data daily and monitor performance annually
THE MONITORING FREQUENCY:	Continuous
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Temperatures recorded on strip chart recorder
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	One hour

Table 3.4 PSEU Designation:	Compact Line #2
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators:	#1: Inlet Temperature and Temperature Change

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Measure inlet temperature and temperature change
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Establish minimum/maximum temperatures: Minimum catalyst inlet temperature: 65°F* Temperature change * Measured before pre-heater
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	5% of operating days out of range

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Thermocouples located before and after catalyst bed
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Thermocouple and recorder checked on an annual basis
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Checking monitoring data daily and monitor performance annually
THE MONITORING FREQUENCY:	Continuous
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Temperatures recorded on strip chart recorder
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	One hour

Table 3.5 PSEU Designation:	RW Line
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators:	#1: Inlet Temperature and Temperature Change

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Measure inlet temperature and temperature change
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Establish minimum/maximum temperatures: Minimum catalyst inlet temperature: 65°F* Temperature change * Measured before pre-heater
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	5% of operating days out of range

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Thermocouples located before and after catalyst bed
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Thermocouple and recorder checked on an annual basis
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Checking monitoring data daily and monitor performance annually
THE MONITORING FREQUENCY:	Continuous
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Temperatures recorded on strip chart recorder
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	One hour

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

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