

217/782-2113

"REVISED"  
Title V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
And  
Title I Permit<sup>1</sup>

PERMITTEE

Icon Identity Solutions  
Attn: John Callan, Vice President - Operations  
2480 Greenleaf Avenue  
Elk Grove Village, Illinois 60007

<u>Application No.:</u> 98080019	<u>I.D. No.:</u> 031440AKK
<u>Applicant's Designation:</u>	<u>Date Received:</u> August 7, 1998
<u>Operation of:</u> Metal and Plastic Parts Coating Source	
<u>Date Issued:</u> August 9, 1999	<u>Expiration Date<sup>2</sup>:</u> August 9, 2004
<u>Source Location:</u> 2480 Greenleaf Avenue, Elk Grove Village	
<u>Responsible Official:</u> John Callan, Vice President of Operations	

This permit is hereby granted to the above-designated Permittee to operate a metal and plastic parts coating source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: June 20, 2002  
Revision Date Issued: July 15, 2002  
Purpose of Revision: Administrative Amendment

This administrative amendment is being issued due to a name change. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this administrative amendment. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued August 9, 1999 is incorporated herein by reference.

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

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

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

DES:REP:psj

cc: Illinois EPA, FOS, Region #1  
USEPA

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

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Icon Identity Solutions  
2480 Greenleaf Avenue  
Elk Grove Village, Illinois 60007  
Phone #(847) 364-2250

I.D. No.: 031440AKK  
Standard Industrial Classification: 3993, Signs and advertising specialties

1.2 Owner/Parent Company

Icon Identity Solutions  
2480 Greenleaf Avenue  
Elk Grove Village, Illinois 60007

1.3 Operator

Icon Identity Solutions  
2480 Greenleaf Avenue  
Elk Grove Village, Illinois 60007

John Callan, Vice President of Operations  
Phone #(847) 364-2250

1.4 General Source Description

Icon Identity Solutions is located at 2480 Greenleaf Avenue in Elk Grove Village. The source fabricates and paints metal and plastic signs, monument signs, wall signs, channel letters and ATM buildings.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	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
ATUs	Allotment Trading Unit
Btu	British thermal unit
C	Amount of coating used (gal/month)
C <sub>3</sub>	VOM Containing Waste Collected (T/mo)
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
D	Overall coating density (lb/gal)
d <sub>i</sub>	Overall density of exempt compound i, in lb/gal
E	Emissions per Pollutant
E <sub>t</sub>	Total VOM Emissions (T/mo)
E <sub>1</sub>	Coating VOM Emissions (T/mo)
E <sub>2</sub>	Cleanup Solvent VOM Emissions (T.mo)
E <sub>3</sub>	VOM Containing Waste Credit
ERMS	Emissions Reduction Market System
F	Pollutant Emission Factor (lbs/mmft <sup>3</sup> )
Gal	Gallons
HAP	Hazardous Air Pollutant
Hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
Kg	kilograms
Lb	pound
Mig	Micro Inert Gas
Mg	Megagram
mmBtu	Million British thermal units
mmft <sup>3</sup>	Million cubic feet
mmtherms	Million therms
Mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter

PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T	Tons
TPY	Tons Per Year
T1	Title I - identifies Title I conditions that have been carried over from an existing construction 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 construction permit and subsequently revised in this permit
U	Natural Gas Usage (mmtherms/mo)
U <sub>1</sub>	Coating Usage (gal/mo)
U <sub>2</sub>	Cleanup Solvent Usage (T/mo)
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
V <sub>1</sub>	Coating VOM Content (Lbs VOM/gal)
V <sub>2</sub>	Cleanup Solvent VOM Content (wt.%)
V <sub>3</sub>	VOM Containing Waste VOM Content (wt.%)
wt.	Weight
yr	Year

### 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:

None

- 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:

6 mig/oxygen welders

- 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).

None

#### 3.2 Addition of Insignificant Activities

- 3.2.1 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).

- 3.2.2 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.

3.2.3 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
01 5 Paint Spray Booths	booth m-3	1970	Filter
	Booth G-1 with Drier	2/98	Filter
	Booth G-2 with Drier	2/98	Filter
	Booth G-3 with Drier	2/98	Filter
	Booth G-4 with Drier	2/98	Filter

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

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

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

b. i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

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

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

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

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

5.3 Non-Applicability of Regulations of Concern

N/A

5.4 Source-Wide Operational and Production Limits and Work Practices

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

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	35.1
Sulfur Dioxide (SO <sub>2</sub> )	0.02
Particulate Matter (PM)	1.59
Nitrogen Oxides (NO <sub>x</sub> )	2.67
HAP, not included in VOM or PM	-
TOTAL	39.38

#### 5.5.2 Emissions of Hazardous Air Pollutants

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

#### 5.5.3 Other Source-Wide Emission Limitations

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

### 5.6 General Recordkeeping Requirements

#### 5.6.1 Emission Records

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

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

#### 5.6.2 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 record keeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in

response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM and HAP Emissions

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

5.10 Special Permit Shield

N/A

## 6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permit. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

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

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

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

## 6.2 Applicability

- a. This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and source's baseline emissions also being less than 10 tons.

## 6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM during the seasonal allotment period:
  - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate to determine actual VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions in tons during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit;
  - iii. Total VOM emissions from the source in tons during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Paint Booths  
Control 01 - Fabric Filters

7.1.1 Description

Five paint booths are utilized in the application of air dried coatings to Metal signs. Heated forced air is used to expedite the drying process. Emissions of VOM and HAP's result from the use of coating related materials such as paints, thinners, and cleaning solvents. Fuel emissions result from the use of natural gas in the four dryers.

Four of the five paint booths, G-1 through G-4, were constructed in February of 1998, the fifth paint booth, m<sup>-3</sup>, was originally constructed in 1970 and modified after April 14, 1972. All paint booths are equipped with a fabric filter rated at 96% efficient. The four new paint booths originally replaced 2 of the existing 4 booths, since that time a third existing booth has been retired bringing the total number of booths to five.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01 5 Paint Spray Booths	Booth m <sup>-3</sup>	Filter
	Booth G-1 with Drier	Filter
	Booth G-2 with Drier	Filter
	Booth G-3 with Drier	Filter
	Booth G-4 with Drier	Filter

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected spray booth" for the purpose of these unit-specific conditions, is each paint spray booth with fabric filter and respective air dryer, as applicable.
- b. Each affected spray booth at the source is subject to 35 IAC 212.321(a), which requires that:
  - 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, 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)].

- c. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected paint booth shall not exceed the allowable emission rates specified in the following equation

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

Where:

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

- i. For process weight rates up to 408 MG/hr (450 T/hr):

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

- ii. For process weight rates in excess of 408 MG/hr (450 T/hr):

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

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.[35 IAC 212.321]

- d. Each affected paint booth at the source is subject to 35 IAC 218.204(j)(1) &(2)A for extreme performance coatings and clear coats which provides that:

- i. No owner or operator of an affected paint booth shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which

are specifically exempted from the definition of VOM) as applied at each coating applicator:

	<u>kg/liter</u>	<u>lbs/gallon</u>
Extreme Performance Coat	3.5	0.42
Clear Coat	4.3	0.52

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

7.1.4 Non-Applicable Regulations of Regulations of Concern

Each affected spray booth is not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material which excludes affected paint booths from this requirement.

7.1.5 Operational and Production Limits and Work Practices

- a. Each affected paint booth shall only be operated with natural gas as the fuel in the forced air drier.
- b. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- c. An adequate inventory of spare filters shall be maintained.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide limitations in Condition 5.5, the affected paint booth is subject to the following:

- a. Usage of coating and cleanup solvent, VOM content of coatings, or density of cleanup solvent, and VOM emissions from the 5 booths combined shall not exceed the following:

<u>Material</u> (Lb/Mo)(Ton/Yr)	<u>Usage<sup>c</sup></u>		<u>VOM</u> <u>Content<sup>c</sup></u> (Lb/Gal)	<u>VOM Emissions</u>	
	(Gal/Mo)	(Gal/yr)		(Lb/Mo)	(Ton/Yr)
Coatings	1,600	15,200	3.5	5,600	26.6
Clear Coat	100	977	4.3	430	2.1
Cleanup					
Solvents	250 <sup>a</sup>	2,200 <sup>a</sup>	5.72 <sup>b</sup>	1,430 <sup>a</sup>	
	<u>6.3<sup>a</sup></u>				
				Total =	
					35.0

<sup>a</sup> Net figure after credit for return of contaminated material.

<sup>b</sup> for calculation purposes. Higher density solvent may be used provided that the VOM emission limit is met.

<sup>c</sup> The material usage limitation is expressed in gallons minus water and any compounds which are specifically exempted from the definition of VOM.

In addition to the aggregate emissions total of 35.0 ton/yr from all booths, none of the individual new booths shall have emissions exceeding 19.6 ton/yr.

Compliance with annual limits shall be determined from a running total of 12 months of data, provided that for the first 12 months following the initial effectiveness of the limits, the limits shall be prorated. For example, the limits after 2 months, shall be 2/12 of the annual limits.

- b. Usage of coating and cleanup solvent, VOM content of coatings, or density of cleanup solvent, and VOM emissions from the booths, G1-G4 combined shall not exceed the following:

<u>Material</u> (Ton/Yr)	<u>Usage<sup>c</sup></u>		<u>VOM</u> <u>Content<sup>c</sup></u> (Lb/Gal)	<u>VOM Emissions</u>	
	(Gal/Mo)	(Gal/yr)		(Lb/Mo)	(Ton/Yr)
Coatings	1,137	10,800	3.5	3,981	18.9
Clear Coat	71	693	4.3	306	1.49
Cleanup					
Solvents	178 <sup>a</sup>	1,566 <sup>a</sup>	5.72 <sup>b</sup>	1,016.7 <sup>a</sup>	
	<u>4.48<sup>a</sup></u>				
				Total =	
					24.87

<sup>a</sup> Net figure after credit for return of contaminated material.

- b. For calculation purposes. Higher density solvent may be used provided that the VOM emission limit is met.
- c. The material usage limitation is expressed in gallons minus water and any compounds which are specifically exempted from the definition of VOM.
- c. Allowable PM emissions pursuant to 35 IAC 212.321 are 0.55 lb/hr per booth, but the Permittee has agreed to a negligible emitter of PM(0.1 Lb/hr) which is achieved by operating the filters in accordance with the manufacturer's instruction.
- d. Emissions of VOM from the fuel combustion units, forced air dryers, shall not exceed 0.1 TPY. This is based on a maximum natural gas usage of 35 mmft<sup>3</sup>/yr.
- e. The above limitations were established in Construction Permit 97120020, pursuant to 35 IAC Part 203. These limits ensure that the construction addressed in the aforementioned Construction permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

#### 7.1.7 Testing Requirements

Testing for VOM content of coatings and cleanup solvents shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]

- a. The VOM content of representative coatings "as applied" on the affected paint booths shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a)
- b. Upon reasonable request by the Illinois EPA, the VOM content of specific cleaning solvents used on each affected paint booth shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208, and 218.211(a).
- c. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent. [35 IAC 218.105(a), 218.208, and 218.211(a)].

- d. The percent concentration of solvent in the VOM containing waste from the affected coating lines shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

#### 7.1.8 Monitoring Requirements

The Permittee shall visually inspect the filters on a regular basis in order to ensure proper operation of the filters and the need for replacement.

#### 7.1.9 Record keeping Requirements

The Permittee shall maintain records of the following items for each affected paint booth to demonstrate compliance with Conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

- a.
  - i. The name and identification number of each coating and cleanup solvent as applied on each of the affected spray booths.
  - ii. The usage of each coating and cleanup solvent, in units of gallons/month and gallons/year minus water and any compounds specifically exempt for the definition of VOM as applied on each of the affected spray booths.
  - iii. The VOM content pounds per gallon of each coating and cleanup solvent (minus water and any compounds which are specifically exempt from the definition of VOM) as applied each day on each of the affected spray booths.
  - iv. The weight of HAPs per volume of each coating (minus water and any compounds which are specifically exempt) and cleanup solvent as applied each day on each of the affected spray booths.
- b. Test records of VOM and HAP content (Lb VOM/gallon) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.

- c. Total amount of any VOM collected (e.g., cleanup solvent) and either recycled back into the process or shipped off-site and hence not emitted.
- d. Emissions of VOM and HAPs (lb/month and tons/yr) as calculated by condition 7.1.12.
- e. Fuel combustion emissions:
  - i. Natural gas usage (mmtherms/mo and mmtherms/yr)
  - ii. Fuel combustion emissions calculated in accordance with the procedures given in condition 7.1.12 (T/mo and T/yr).
- f. Results of filter inspections and dates of replacements made.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- i. Annual emissions from the source in excess of the emission limits specified in condition 5.5.1, within 30 days of such an occurrence.
- ii. Any record showing violation of the VOM limits as defined in section 7.1.6 of this permit shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
- iii. Any record showing violation of Section 218.204 of this part shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211 (c)(3)(a)].
- iv. At least 30 calendar days before changing the method of compliance with the Lb/gallon VOM limit the owner or operator shall certify to the Illinois EPA that the coating line will be in compliance with all applicable rules [218.211(c)(3)].

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected paint booth without prior notification to the Illinois EPA or

revision of this permit. 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:

Usage of coatings or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected paint booth remains in compliance.

#### 7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of an affected paint booth.
- b. To determine compliance with Condition 5.5.1 and 7.1.6, VOM emissions from the affected coating lines shall be calculated based on the following:

$$E_T = E_1 + E_2 - E_3$$

Where:

$E_T$  = Total VOM Emissions (T/mo)

$$E_1 = U_1 \times V_1$$

Where:

$E_1$  = Coating VOM Emissions (T/mo)

$U_1$  = Coating Usage (gal/mo)\*

$V_1$  = Coating VOM Content (lbs VOM/gal)\*

\* Minus water and exempt compounds.

$$E_2 = U_2 \times V_2$$

Where:

$E_2$  = Cleanup Solvent VOM Emissions (T/mo)

$U_2$  = Cleanup Solvent Usage (T/mo)

$V_2$  = Cleanup Solvent VOM Content (wt. %)

$$E_3 = C_3 \times V_3$$

Where:

$E_3$  = VOM Containing Waste Credit (T/mo)

C<sub>3</sub> = VOM Containing Waste Collected (T/mo)  
V<sub>3</sub> = VOM Containing Waste VOM Content (wt. %)\*

\* As measured in accordance with Condition 7.1.7(d).

- c. To determine compliance with Condition 5.5.1, fuel combustion emissions from the affected coating line shall be calculated based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lbs/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	100
PM	5.7
SO <sub>2</sub>	0.6
VOM	5.5

These are the emission factors for NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOM for uncontrolled natural gas combustion in commercial boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2 AP-42, Volume I, Supplement F, February, 1998. VOM emission factor based on TOC factor corrected for 34% methane contribution.

$$E = U \times F \times (0.05)*$$

Where:

E = Emissions per Pollutant (T/mo)  
U = Natural Gas Usage (mmtherms/mo)  
F = Pollutant Emission Factor (lbs/mmft<sup>3</sup>)

\* Based upon the following conversion factors:

2000 lbs/T  
1000 Btu/ft<sup>3</sup>  
1 Therm/100,000 Btu

## 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 March 4, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

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

operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

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

#### 8.5 Testing Procedures

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

#### 8.6 Reporting Requirements

##### 8.6.1 Monitoring Reports

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

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

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

#### 8.6.2 Test Notifications

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

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

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

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

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Eisenhower Tower  
1701 South First Avenue  
Maywood, Illinois 60153

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

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

Notwithstanding the expiration date listed on the first page of this permit, the Permittee's obligation to comply with the Title I requirements, identified in this permit by T1, T1R, T1N, and associated compliance procedures remains in effect in accordance with 35 IAC Part 203 or 40 CFR 52.21.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

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

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

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

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

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

#### 9.4 Obligation to Comply With Other Requirements

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

#### 9.5 Liability

##### 9.5.1 Title

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

##### 9.5.2 Liability of Permittee

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

##### 9.5.3 Structural Stability

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

##### 9.5.4 Illinois EPA Liability

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

#### 9.5.5 Property Rights

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

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

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

#### 9.6.2 Records of Changes in Operation

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

#### 9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- 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)(1), (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:

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Name:

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Official Title:

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Telephone No.:

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Date Signed:

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KLS:psj