



TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NOT APPLICABLE TO THIS PERMIT	17
6.1 Description of ERMS	
6.2 Applicability	
6.3 Recordkeeping and Reporting	
6.4 Federal Enforceability	
7.0 UNIT SPECIFIC CONDITIONS	19
7.1 Unit 01: Coating Line Control: Fabric Filters	
7.2 Unit 02: Weather Guard Powder Coating Line Control: None	
7.3 Unit 03: Waste Incinerator Control: None	
7.4 Unit 04: Air Make-Up Units Control: None	
7.5 Unit 05: Welding Station Control: None	

PAGE

7.6	Unit 06: Aerosol Touch Up Operation Control: None	
7.7	Unit 07: Touch-Up Coating Line Control: None	
8.0	GENERAL PERMIT CONDITIONS	48
8.1	Permit Shield	
8.2	Applicability of Title IV Requirements	
8.3	Emissions Trading Programs	
8.4	Operational Flexibility/Anticipated Operating Scenarios	
8.5	Testing Procedures	
8.6	Reporting Requirements	
8.7	Obligation to Comply with Title I Requirements	
9.0	STANDARD PERMIT CONDITIONS	53
9.1	Effect of Permit	
9.2	General Obligations of Permittee	
9.3	Obligation to Allow Illinois EPA Surveillance	
9.4	Obligation to Comply with Other Requirements	
9.5	Liability	
9.6	Recordkeeping	
9.7	Annual Emissions Report	
9.8	Requirements for Compliance Certification	
9.9	Certification	
9.10	Defense to Enforcement Actions	
9.11	Permanent Shutdown	
9.12	Reopening and Reissuing Permit for Cause	
9.13	Severability Clause	
9.14	Permit Expiration and Renewal	
10.0	ATTACHMENTS	
10.1	Attachment 1 - Emission of Particulate Matter from New Process Emission Units	1-1
10.2	Attachment 2 - Example Certification by a Responsible Official	2-1
10.3	Attachment 3 - Guidance on Revising This Permit	3-1
10.4	Attachment 4 - Form 199-CAAPP, Application For Construction Permit (For CAAPP Sources Only)	4-1
10.5	Attachment 5 - Guidance on Renewing This Permit	5-1

1.0 SOURCE IDENTIFICATION

1.1 Knaack Manufacturing Company

Knaack Manufacturing Company  
420 East Terra Cotta Avenue  
Crystal Lake, Illinois 60014  
815/459-6093, Ext. 234

I.D. No.: 111015ABO  
Standard Industrial Classification: 3499, Fabricated Metal  
Products

1.2 Owner/Parent Company

Emerson Electric  
8000 West Florissant Avenue  
P.O. Box 4100  
St. Louis, Missouri 63136

1.3 Operator

Knaack Manufacturing Company  
420 East Terra Cotta Avenue  
Crystal Lake, Illinois 60014

Atul Saigal, Engineering Manager  
815/459-6093, Ext. 305

1.4 General Source Description

Knaack Manufacturing Company is located at 420 East Terra Cotta Avenue, Crystal Lake. This source is primarily engaged in the transforming uncoated steel into coated, weather proofed toolboxes utilized for storing tools, etc. From a storage/holding area uncoated steel is moved through one of three coil processing machines. After appropriate processing, the steel is spot or MIG welded together. The boxes then travel (via a conveyor) through the Knaack line paint/curing area or the weather guard area where parts are coated with electrostatic spray equipment and water-base coating or powder coated (if traveling through weather guard area). When parts arrive at Knaack assembly area they are touched-up with aerosol paint if needed. Final assembly, if necessary, is then performed before the product is cartoned and moved to finished goods inventory.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
°C	Celsius
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
CO	Carbon monoxide
ERMS	Emissions Reduction Market System
°F	Fahrenheit
ft <sup>3</sup>	Cubic feet
gal	gallons
gr	gram
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
Kg	kilogram
kW	kilowatts
l	Liter
lb	Pound
MACT	Maximum Achievable Control Technology
Mft <sup>3</sup>	Million cubic feet
mmBtu	Million British thermal units
mg	Megagram
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
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
scm	Standard cubic meter
SO <sub>2</sub>	Sulfur Dioxide
T	tons

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
VOC	Volatile Organic Compound
VOM	Volatile Organic Material
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:

None

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

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)].

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

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

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

Wastewater Storage Tank  
Hand Grinding

### 3.2 Compliance with Applicable Requirements

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

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

### 3.3 Addition of Insignificant Activities

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed/Modified	Emission Control Equipment
01	Coating Line	1986	Fabric Filters
02	Weather Guard Powder Coating Line	10/1987/ modified in 1997	None
03	Waste Incinerator	6/1987	None
04	Air Make-Up Units	3 Units at 5.28 mmBtu/Hr - 1990 1 Unit at 7.5 mmBtu/Hr - 1978 1 Unit at 5.28 mmBtu/Hr - 1985	None
05	Welding Station	1968	None
06	Aerosol Touch-Up Operation	1986	None
07	Touch Up Coating Line	2002	None

## 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. 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 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.

#### 5.2.4 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.

- 5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

#### 5.2.7 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
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	93.00
Sulfur Dioxide (SO <sub>2</sub> )	0.23
Particulate Matter (PM)	9.2
Nitrogen Oxides (NO <sub>x</sub> )	35.8
HAP, not included in VOM or PM	----
Total	138.2

5.5.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7) (a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions.

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 Source-Wide Testing Requirements

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

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the

right to observe all aspects of such tests [35 IAC 201.282(a)].

- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.6.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.5.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

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

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

Test the material(s) that contribute to individual and total HAP emissions.

- b. Testing may be conducted by the supplier of the HAP-containing material.
- c. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.10 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.
- d. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

## 5.7 General Recordkeeping Requirements

### 5.7.1 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.

### 5.7.2 Records for VOM and HAP Emissions

- a. Total annual emissions of each individual HAP and of total HAPs on a calendar year basis for the applicable emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. Total monthly and running 12 month total VOM emissions for the whole source based on the applicable emission units covered by Section 7 (Unit Specific Conditions) of this permit.

### 5.7.3 Records for Operating Scenarios

N/A

### 5.7.4 Retention and Availability of Records

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

## 5.8 General Reporting Requirements

### 5.8.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source 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.

5.8.2 Annual Emissions Report

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

5.9 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.10 General Compliance Procedures

5.10.1 General Procedures for Calculating Emissions

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

## 6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. 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 in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

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

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

### 6.2 Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit. This limitation is established at the request of the

source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 IAC 205.205.

### 6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine compliance with the above limitation:
  - 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; and
  - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 35 IAC 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from 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.

### 6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 01: Coating Line  
Control: Fabric Filters

7.1.1 Description

Water based coating is electrostatically applied to metal parts in two booths. Overspray from each booth is channeled through fabric filters for each respective booth. After passing through the spray booths, parts proceed through Bake Oven #1.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Equipment	Date Constructed	Emission Control Equipment
Group 01	Coating ("Tan") Line 1, Paint Booth #1	1986	Fabric Filters
	Coating ("Tan") Line 1, Booth #2 and Bake Oven #1	1986	Fabric Filters

7.1.3 Applicability Provisions and Applicable Regulations

a. An "affected coating line", for the purpose of these unit specific conditions, is a coating operation that includes two spray booths and a curing oven which, collectively, are used to apply and cure a coating to metal; this operation falls under the category of miscellaneous metal parts and products coating: Extreme Performance coating. The affected coating line is identified in Condition 7.1.2.

b. The affected coating line is subject to 35 IAC 212.321, which provides that:

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

c. The affected coating line at the source is subject to 35 IAC 218.204(j) (2) (B) for Miscellaneous Metal Parts and Products Coating: Extreme Performance Coating, Baked, which provides that:

- i. No owner or operator of an affected coating line 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 Coating. 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:

kg/liter	lb/gallon
0.40	3.3

- 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-Applicability of Regulations of Concern

- a. The affected coating line is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating line does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.
- b. The affected coating line 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 the affected coating line from this requirements

7.1.5 Operational and Production Limits and Work Practices

- a. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- b. 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 emission limitations in Condition 5.5, and 7.1.3, the affected coating line is subject to the following:

- a. Emissions of organic material from the affected coating line shall not exceed the following limit: 76.9 T/yr. This limit is based on the maximum

emission rate (17.6 lb/hr) and the maximum hours of operation (8,736 hr/yr) indicated in the permit application. [T1]

- b. Emissions of particulate matter from the affected coating line shall not exceed the following limit: 2.4 T/yr. This limit is based on the allowable emission limit (0.55 lb/hr) at the maximum operating rate (50 lb/hr) and the maximum hours of operation (8,736 hr/yr) indicated in the permit application. [T1]
- c. Emissions of nitrogen oxides and carbon monoxide from the dry off oven shall not exceed 1.4 and 0.3 T/yr, respectively. These limits are based on standard emission factors, firing of natural gas at the maximum firing rate (3.2 mmBtu/hr) and the maximum hours of operation as indicated in the permit application. [T1]

Compliance with the annual limit shall be based on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total. [T1]

The above limitations was established in permit 86040010, pursuant to Title I of the Clean Air Act, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit do not constitute a new major source or major modification pursuant to these rules.

#### 7.1.7 Testing Requirements

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

Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating line 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) and 218.211(a).

- a. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a);

- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent. [35 IAC 218.105(a) and 218.211(a)]

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

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

- a.
  - i. The name and identification number of each coating and cleaning solvents as applied on the affected coating line;
  - ii. The usage of each coating and cleaning solvent in units of gallons/month;
  - iii. Density of each applied coating and cleanup solvent;
  - iv. The weight of VOM per volume of each coating, in lb/gal, (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on each of the affected coating line;
  - v. The weight of VOM per volume of each cleaning solvent, in units of lb/gal as applied on each of the affected coating line;
  - vi. The aggregate monthly and annual VOM emissions from the affected coating line based on the coating, and cleaning solvent usage and VOM content, and with supporting calculations;
  - vii. If credit is desired for VOM emissions from waste materials, aggregate records of materials disposed of or recycled shall be maintained for all coatings, cleaning solvents, and any other VOM containing material use on the affected coating line on a monthly basis; and
  - ix. Total natural gas usage for oven (ft<sup>3</sup>/mo).

Note: A factor 1 therm = 100 ft<sup>3</sup> may be used for conversion.

- b. Records of the testing of VOM and HAP content (in wt. %) 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.

#### 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:

Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(c) within 30 days of such an occurrence.

#### 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 coating line 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 Condition 7.1.7, the source wide emission limitations in Condition 5.5.1 and 7.1.6 are not exceeded and the affected coating line remains in compliance with Condition 7.1.3(c).

#### 7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations of Condition 7.1.6 shall be based on the recordkeeping requirements in 7.1.9 and the formulas below:

Emissions (lb/hr) = Paint usage (gal/hr) x solids content (lb/gal) x (1 - transfer efficiency) x (1 - control efficiency)

Where:

Transfer efficiency = 75 % (per Title V application)  
Control Efficiency = 95 % (per Title V application)

- b. i. Compliance of each coating with the VOM emission limitations in Condition 7.1.3(c) shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formulae listed below:

$$\text{Coating VOM Content} = V \times D / [ 1 - W \times D ]$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \sum (w_i / d_i)$$

Where:

$w_i$  = Percent exempt compound i in the coating,

$d_i$  = Overall density of exempt compound i, in lb/gal

and the summation  $\sum$  is applied over water and all exempt compounds i, in the coating.

Total VOM Content = Coating VOM Content +  
Cleaning Solvent Content

- ii. Compliance of affected coating line with the VOM emission limitations in Condition 5.5.1 and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formulae listed below:

$$\text{Coating VOM Emissions} = V \times D \times U$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

U = Overall coating usage (gal/mo and gal/yr)

Cleaning Solvent VOM Emissions =  $V_1 \times D_1 \times U_1$

Where:

$V_1$  = Percent VOM in the cleaning solvent (%)

$D_1$  = Overall cleaning solvent density (lb/gal)

$U_1$  = Overall cleaning solvent usage (gal/mo and gal/yr)

Total VOM Emissions = Coating VOM Emissions +  
Cleaning Solvent VOM Emissions - Cleaning  
Solvent VOM Emissions from recycled

- c. To determine compliance with Condition 5.5.1 and 7.1.6(c), fuel combustion emissions from the natural gas-fired oven on the affected coating line shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/Mft<sup>3</sup>)</u>
NO <sub>x</sub>	100
PM	7.6
SO <sub>2</sub>	0.6
CO	84
VOM	5.5

NOTE: 1 therm = 100 ft<sup>3</sup>

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (< 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement D, July 1998. VOM emission factor based on TOC factor corrected for 52% methane contribution.

Bake Oven Emissions (lb) = (Natural Gas Consumed, Mft<sup>3</sup>) x (The Appropriate Emission Factor, lb/Mft<sup>3</sup>)

7.2 Group 02: Weather Guard Powder Coating Line  
Control: None

7.2.1 Description

Uncoated metal parts are coated in one of four powder-coating booths. The parts then travel through cure ovens #1, #2, or #3 (3.6, 3.7 and 2.6 mmBtu/hr) where parts are heated to 450 °F.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Equipment	Date Constructed /Modified	Emission Control Equipment
Group 02	Coating Line 2, Paint Booth 1, Cure Oven #1 (3.6 mmBtu/hr)	10/1987/ modified in 1997	None
	Coating Line 2, Booth 2, Cure Oven #2 (3.7 mmBtu/hr)	10/1987/ modified in 1997	None
	Coating Line 2, Paint Booth 3, Cure Oven #2	10/1987/ modified in 1997	None
	Coating Line 2, Paint Booth 4, Cure Oven #3 (2.6 mmBtu/hr)	10/1987/ modified in 1997	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line", for the purpose of these unit specific conditions, is a coating operation that includes a four spray booths and three cure ovens; collectively, the spray booths and ovens are used to apply and/or cure a coating to metal that falls under the category of miscellaneous metal parts and products coating. The affected coating line is identified in Condition 7.2.2.
- b. The affected coating line is subject to 35 IAC 212.321, which provides that:

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

c. The affected coating line at the source is subject to 35 IAC 218.204(j)(2)(B) for Miscellaneous Metal Parts and Products Coating: Extreme Performance Coating, Baked, which provides that:

i. No owner or operator of an affected coating line 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 Coating. 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:

kg/liter	lb/gallon
0.40	3.3

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.

#### 7.2.4 Non-Applicability of Regulations of Concern

a. The affected coating line is not subject to 40 CFR Part 64, Compliance Assurance Monitoring because the affected unit does not use an add-on control device to achieve compliance with an emission limitation or standard.

b. The affected coating line 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 the affected coating line from this requirements

#### 7.2.5 Operational and Production Limits and Work Practices

The Permittee shall use powder coatings only on the affected coating line.

#### 7.2.6 Emission Limitations

In addition to condition 5.2.2, and the source-wide emission limitations in Condition 5.5, and 7.2.3, the affected coating line is subject to the following:

a. Emissions of particulate matter from the affected coating line shall not exceed the following limit: 3.11 T/yr. This limit is based on the maximum material usage per booth, 35 IAC 212.321 allowable of

0.71 lb/hr/booth, and the maximum operating hours per year per booth of 8,760 hr/yr. [T1]

- b. Emissions of the fuel combustion units for affected paint line shall not exceed the following limits:

Maximum Combined Firing Rate: 44.58 mmBtu/hr  
Maximum Fuel Usage: 32.54 Mft<sup>3</sup>/mo  
Nitrogen Oxides: 1.63 T/mo, 19.56 T/yr  
Carbon Monoxide: 0.34 T/mo, 4.10 T/yr

These limits are based on maximum combined firing rate, maximum fuel usage, maximum operating hours per year of 8,760 hr/yr, standard emission factors, and maximum individual firing rates less than 10 mmBtu/hr. [T1]

Compliance with the annual limit shall be based on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total. [T1]

The above limitation was established in permit 96020071, pursuant to Title I of the Clean Air Act, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit do not constitute a new major source or major modification pursuant to these rules.

7.2.7 Testing Requirements

None

7.2.8 Inspection Requirements

None

7.2.9 Recordkeeping Requirements

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

- a. i. The name and identification number of each coating and cleaning solvents as applied on affected coating line;
- ii. Density of each applied coating;

iii. The weight of VOM per volume of each coating, in lb/gal, (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each of the affected coating line;

b. Total natural gas usage for ovens (ft<sup>3</sup>/mo).

Note: 1 therm = 100 ft<sup>3</sup>

#### 7.2.10 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:

Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.2.3(b) within 30 days of such an occurrence.

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

#### 7.2.12 Compliance Procedures

a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance and the work-practices inherent in operation of the affected coating line.

b. Compliance with VOM limitations of Condition 7.2.3(c) shall be demonstrated based on recordkeeping requirements of Condition 7.2.9(a).

c. To determine compliance with Condition 5.5.1 and 7.2.6(b), fuel combustion emissions from the natural gas-fired ovens on the affected coating line shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/Mft<sup>3</sup>)</u>
NO <sub>x</sub>	100
PM	7.6
SO <sub>2</sub>	0.6
CO	84
VOM	5.5

NOTE: 1 therm = 100 ft<sup>3</sup>

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (< 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42,

Volume I, Supplement D, July 1998. VOM emission factor based on TOC factor corrected for 52% methane contribution.

Cure Oven Emissions (lb) = (Natural Gas Consumed, Mft<sup>3</sup>) x (The Appropriate Emission Factor, lb/Mft<sup>3</sup>)

7.3 Group 03: Waste Incinerator  
Control: None

7.3.1 Description

Waste incinerator used for on-site disposal of Type 1 waste and paint filters. The incinerator is of "multiple-chamber" design, with a primary combustion chamber (into which waste is charged) followed by a secondary combustion chamber.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 03	Waste Incinerator Manufacturer: Ecolaire Combustion Products, Inc. Model: 650E Capacity, lb/hr: 500	6/1987	None

7.3.3 Applicable Regulations

- a. An "affected waste incinerator", for the purpose of these unit specific conditions, is an incinerator that is used to dispose of combustible waste generated on site. The wastes consist of Type 1 and special waste. The affected incinerator is identified in Condition 7.3.2.
- b. Emissions of PM from any incinerator, for which construction or modification commenced on or after April 14, 1972, shall not exceed 229 mg/scm (0.1 gr/scf) of effluent gases, corrected to 12 percent carbon dioxide [35 IAC 212.181(d)]; and
- c. Emissions of CO from any incinerator shall not exceed 500 ppm, corrected to 50 percent excess air [35 IAC 216.141].

7.3.4 Non-Applicability of Regulations of Concern

The affected incinerator is not subject to 40 CFR Part 64, Compliance Assurance Monitoring because the affected unit does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Operating Requirements, Production Limits, and Work Practices

- a. i. The secondary combustion chamber of the incinerator shall be preheated to the

manufacturer's recommended temperature but not lower than 1400°F prior to introducing waste into the incinerator.

- ii. A. This temperature shall be maintained until burnout of waste in the primary chamber is completed.
  - B. The amount of waste input to affected incinerator shall be consistent with the manufacturer's recommended practices for charging of waste.
  - C. The affected incinerator shall be operated pursuant to written operating procedures, which shall address the above requirements and other practices for proper operation of the incinerators.
  - D. Individuals that operate incinerator shall be trained in the proper operating procedures for the incinerator.
- iii. Only Type 1 Waste and used paint filters shall be incinerated and at a rate not to exceed 500 pounds per hour.
  - iv. Paper paint filters shall not exceed 15 percent by weight of the hourly waste charged to the incinerator.

#### 7.3.6 Emission Limitations

In addition to condition 5.2.2, and the source-wide emission limitations in Condition 5.5, and 7.3.3, the affected incinerator is subject to the following:

Emissions of particulate matter and carbon monoxide from the affected incinerator shall not exceed 1.5 and 13.3 T/yr. These limits are being applied to define the potential emissions of the unit and are derived from allowable emissions, based on the type of waste, unit capacity, and hours of operation indicated in the permit application. [T1]

Compliance with the annual limit shall be based on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total. [T1]

The above limitation was established in permit 86040010, pursuant to Title I of the Clean Air Act, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and 40 CFR

52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit do not constitute a new major source or major modification pursuant to these rules.

7.3.7 Testing Requirements

N/A

7.3.8 Monitoring Requirements

- a. The affected incinerator shall be equipped with a secondary combustion chamber temperature indicator with continuous recorder which allows to verify compliance with requirements of Condition 7.3.5(a).
- b. The condition of the affected incinerator shall be inspected on a periodic basis for the presence of deficiencies.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain the following records for the affected incinerator to demonstrate compliance with Conditions 5.5.1, and 7.3.6 pursuant to Section 39.5(7)(b) of the Act:

- a. A secondary combustion chamber temperature during the time of operation;
- b. Hours of operation of affected incinerator;
- c. Annual aggregate PM and CO emissions from the incinerator, based on the hours of operation and the applicable emission factors, with supporting calculations;
- d. Written operating procedures for each incinerator;
- e. Operating logs for each incinerator, which include time beginning of charge waste, operating temperature of secondary chamber, time burnout of waste completed; and
- f. Inspection maintenance logs for affected incinerator, with dates of inspection, maintenance, repair, or other actions completed.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable

requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Emissions of PM and CO from the incinerator that may be in excess of the limits specified in Conditions 5.5.1 and 7.3.6 within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. To determine compliance with Condition 5.5.1, 7.3.3 and 7.3.6 emissions from the incinerator shall be calculated based on the following emission factors from the most recent stack test and formula listed below:

<u>Pollutant</u>	<u>Emission Factor (lb/hr)</u>
CO	0.294
PM	0.488

NOTE: 1 therm = 100 ft<sup>3</sup>

Incinerator Emissions (Tons) = (Emission Factor) x (Hours of Operation) ÷ 2000.

7.4 Group 04: Air Make-Up Units  
Control: None

7.4.1 Description

Five natural gas fired air make-up units used as sources of additional heating.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 04	Natural Gas-Fired Air Make-Up Units (5 Total): Heat Input Capacities: 1 at 7.5, 1 at 5.28, and 3 at 5.28 mmBtu/Hr	3 Units at 5.28 mmBtu/Hr - 1990 1 Unit at 7.5 mmBtu/Hr - 1978 1 Unit at 5.28 mmBtu/Hr - 1985	None

7.4.3 Applicable Provisions and Regulations

- a. An affected air make-up unit, for the purpose of these unit-specific conditions is five natural gas fired air make-up units used as sources of additional heat. The affected air make-up unit is identified in Conditions 7.4.2.

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected air make-up unit is not subject to 35 IAC 214.122 because it does not burn either solid fuel or liquid fuel exclusively.
- b. The affected air make-up unit is not subject to 35 IAC 216.121 since this rule applies to emission units whose heat input capacity is greater than 10 mmBtu/hr.
- c. The affected air make-up unit is not subject to 35 IAC 217.122 since the rule applies to emission units whose heat input capacity is greater than 250 mmBtu/hr.
- d. The affected air make-up unit is not subject to 40 CFR Part 64, Compliance Assurance Monitoring because the affected unit does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1 the affected air make-up unit is subject to the following:

None

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

- a. Total natural gas usage for affected air make-up unit (ft<sup>3</sup>/mo and ft<sup>3</sup>/yr).
- b. Annual aggregate CO, PM, SO, VOM, and NO<sub>x</sub> emissions from each affected air make-up unit, based on fuel consumption and the applicable emission factors, with supporting calculations.

Note: 1 therm = 100 ft<sup>3</sup>

7.4.10 Reporting Requirements

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

- a. Emissions of CO, PM, SO, VOM, and NO<sub>x</sub> from affected air make-up unit in excess of the limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with the emission limits in Conditions 5.5.1 and 5.5.3 shall be based on the recordkeeping

requirements in Condition 7.4.9 and the emission factors and formulas listed below:

- i. Emissions from affected air make-up unit burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10<sup>6</sup> ft<sup>3</sup>)</u>
CO	84
PM	7.6
SO <sub>2</sub>	0.6
VOM	5.5
NO <sub>x</sub>	100

Note: 1 therm = 100 ft<sup>3</sup>

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (< 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement D, July 1998. VOM emission factor based on TOC factor corrected for 52% methane contribution.

Air Make-Up Unit Emissions (Tons) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor/2000.

7.5 Group 05: Welding Station  
Control: None

7.5.1 Description

Welding operation at the site to weld aluminum and steel sheet metal.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Date Constructed	Emission Control Equipment
Group 05	Welding Station	1968	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected welding station" for the purpose of these unit specific conditions is an individual welding station for utilized for welding aluminum sheet metal into cabinets and toolboxes. The affected welding station is identified in 7.5.2.
- b. Each affected welding station at the source is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 1) [35 IAC 212.322(a)].

7.5.4 Non-Applicability of Regulations of Concern

The affected welding station is not subject to 40 CFR Part 64, Compliance Assurance Monitoring because the affected unit does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

None

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for affected welding stations in order to demonstrate compliance with Conditions 5.5.1 and 7.5.3(b) of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total welding raw material usage in terms of T/mo and T/yr.
- b. The monthly and annual PM emissions from the affected welding stations based on the recordkeeping requirements and compliance procedures in Condition 7.5.12, with supporting calculations.

7.5.10 Reporting Requirements

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

Emissions of PM from affected welding stations in excess of the limits specified in Condition 5.5.1.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.5.12 Compliance Procedures

To determine compliance with Condition 5.5.1, emissions from the affected welding stations shall be calculated based on the following:

PM Emissions = 0.0080\* lbs Part/lb wire (lb) x Raw Welding Material Usage (Electrode consumed, lb)

\* As indicated in the Title 5 permit application.

7.6 Group 06: Aerosol Touch-Up Operation  
Control: None

7.6.1 Description

Aerosol cans used to touch up light paints or scratch areas on final products.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Equipment	Date Constructed	Emission Control Equipment
Group 06	Aerosol Touch-Up Operation	1986	None

7.6.3 Applicability Provisions and Applicable Regulations

a. An "affected aerosol touch-up operation", for the purpose of these unit specific conditions, is a touch up coating line using aerosol cans to apply a coating to metal; this operation falls under the category of miscellaneous metal parts and products coating, Extreme Performance coating (air dried). The affected coating line is identified in Condition 7.6.2.

b. The affected aerosol touch-up operation is subject to 35 IAC 212.321, which provides that:

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

7.6.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected aerosol touch-up operation not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected aerosol touch-up operation does not use an add-on control device to achieve compliance with an emission limitation or standard.

b. The affected aerosol touch-up operation is not subject to 35 IAC 218.204(j)(2), Miscellaneous Metal

Parts and Products Coating, pursuant to 35 IAC 218.208(c).

7.6.5 Operational and Production Limits and Work Practices

None

7.6.6 Emission Limitations

In addition to condition 5.2.2, and the source-wide emission limitations in Condition 5.5, and 7.6.3, the affected aerosol touch-up operation is subject to the following:

Emission limits for VOM are not set for the affected touch up aerosol paint line, as the potential to emit in the absence of permit limits is less than the significant and major source threshold for this pollutant pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

7.6.7 Testing Requirements

None

7.6.8 Inspection Requirements

None

7.6.9 Recordkeeping Requirements

a. The Permittee shall maintain records of the following items for the affected aerosol touch-up operation to demonstrate compliance with this section, pursuant to Section 39.5(7)(b) of the Act:

i. On and after March 15, 1996, the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of Section 218.204(b), (d), (f), (g), (i), (j), (n) and (o) of this Subpart because of the provisions of Section 218.208(c) of this Subpart shall:

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

- B. Perform calculations on a daily basis, and maintain at the source records of such calculations, of the combined volume of touch-up and repair coatings used source-wide for each eight-hour period;
- C. Perform calculations on a monthly basis, and maintain at the source records of such calculations, of the combined volume of touch-up and repair coatings used source-wide for the month and the rolling twelve month period;
- D. Prepare and maintain at the source an annual summary of the information required to be compiled pursuant to subsections (d) (1) and (d) (2) of this Section on or before January 31 of the following year;
- E. Maintain at the source for a minimum period of three years all records required to be kept under this subsection and make such records available to the Illinois EPA upon request;
- F. Notify the Illinois EPA in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 l (1 quart) per eight-hour period or exceeds 209 l/yr (55 gal/yr) for any rolling twelve month period within 30 days after any such exceedance. Such notification shall include a copy of any records of such exceedance; and
- G. "Touch-up and repair coatings" means, for purposes of 35 Ill. Adm. Code 218.208, any coating used to cover minor scratches and nicks that occur during manufacturing and assembly processes.

#### 7.6.10 Reporting Requirements

- a. 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. Pursuant to 35 IAC 218.208(d)(6), the Permittee shall notify the Illinois EPA in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 liter (1 quart) per eight-hour period

or exceeds 209 liter/yr (55 gal/yr) for any rolling twelve month period within 30 days after such exceedance. Such notification shall include a copy of any records of such exceedance.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.6.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance and the work-practices inherent in operation of the affected aerosol touch-up operation.
- b. Compliance of the affected aerosol touch-up operation with 35 IAC 218.208(c) in Condition 7.6.4 shall be based on the recordkeeping requirements in Condition 7.6.9.

7.7 Unit 07: Touch-up Coating Line  
Control: None

7.7.1 Description

New high volume low pressure (HVLP) spray guns will be used for touch-up coating of steel tool boxes on the coating lines. The coating is air dried.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coating Lines	Touch-up Coating Line for Knaack Coating Line and Weather Guard Coating Line	3/2002	None

7.7.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit-specific conditions, is each coating line as described in Conditions 7.7.1 and 7.7.2.
- b. The affected coating lines are subject to the following limitation:
  - i. The Permittee shall not apply at any time any coating in which the VOM content exceeds the following emission limitations for the miscellaneous metal parts and products coating, as applied pursuant to 35 IAC 218.204(j)(2). 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:

kg/l    lb/gal

Extreme Performance Coating Air Dried	0.42	3.5
--	------	-----

- 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.
- c. The affected coating lines are subject to 35 IAC 212.321(a), 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 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)].

7.7.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected coating lines not being subject to 35 IAC 218, Subpart G, because the affected coating lines are required to meet 35 IAC 218.204(c) [35 IAC 218.209].

7.7.5 Operational and Production Limits And Work Practices

Usage of VOM solvent for the affected coating lines combined, including solvent in coatings and cleanup material, shall not exceed 0.5 tons per month and 5 tons per year.

7.7.6 Emission Limitations

- a. Emissions from the affected coating lines combined shall not exceed the following limits. Emissions shall be calculated using the compliance procedures specified in Condition 7.7.12.

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.5	5.0

- b. This permit is issued based on negligible emissions of particulate matter from the affected coating lines. For this purpose, emissions from all such sources shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/yr.
- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- d. The above limitations were established in Permit 02010018, pursuant to 35 IAC Part 203. 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 35 IAC Part 203 [T1].

7.7.7 Testing Requirements

The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under 35 IAC 218.211 [35 IAC 218.211(a)].

7.7.8 Monitoring Requirements

None

7.7.9 Recordkeeping Requirements

- a. The Permittee shall collect and record all of the following information each day for each affected coating line and maintain the information at the source for a period of three years [35 IAC 218.211(c)(2)]:
  - i. The name and identification number of each coating as applied on each affected coating line; and
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each affected coating line.
- b. The Permittee shall maintain records of the following items for the affected coating lines to demonstrate compliance with Conditions 7.7.5 and 7.7.6:
  - i. Usage of coatings and other VOM containing material for the affected coating lines (combined) (tons VOM/month and tons VOM/year);
  - ii. VOM content (pounds VOM/gallon) of each coating and other VOM containing material used; and
  - iii. VOM emissions from the affected coating lines combined (tons/month and tons/year).

7.7.10 Reporting Requirements

- a. i. Any record showing violation of 35 IAC 218.204 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)]
- ii. The Permittee shall within 30 days notify the Illinois EPA, Compliance Section, of

noncompliance of the affected coating lines with other applicable requirements. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

- b. At least 30 calendar days before changing the method of compliance from 35 IAC 218.204 to 35 IAC 218.205 or 35 IAC 218.207, the Permittee shall comply with all requirements of 35 IAC 218.211(d)(1) or (e)(1), respectively. Upon changing the method of compliance from 35 IAC 218.204 to 35 IAC 218.205 or 35 IAC 218.207, the Permittee shall comply with all requirements of 35 IAC 218.211(d) or (e), respectively. [35 IAC 218.211(c)(3)]

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

- a. Compliance with Condition 7.7.3(c) is assumed to be achieved by the work-practices inherent in operation of the affected coating lines.
- b. Compliance with the emission limitations established in Condition 7.7.3(b) shall be determined by the records required by Condition 7.7.9(a).
- c. Compliance with the emission limits established in Condition 7.7.6 shall be based on the recordkeeping requirements in Condition 7.7.9 and material balance.

## 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 21, 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 incentives, 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]:

<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  
9511 West Harrison  
Des Plaines, Illinois 60016

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)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

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

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

- a. Except as further provided in this Part, 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 this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

P = Process weight rate

E = Allowable emission rate

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

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

- 2. 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	lbs/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14,1972.

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	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.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

Where:

P = Process weight rate in metric or T/hr

E = Allowable emission rate in kg/hr or lbs/hr

(Source: Amended at 20 Ill. Reg. 7605, effective May 22, 2996)

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

- a. Except as further provided in this Part, 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 this Section.

- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

P = Process weight rate

E = Allowable emission rate

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

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

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

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

- c. Limits for Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972.

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.	8.7	10.00	19.20
13.	11.1	15.00	25.20
18.	13.8	20.00	30.50
23.	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

Where:

P = Process weight rate in Mg/hr or T/hr

E = Allowable emission rate in kg/hr or lbs/hr.

(Source: Amended at 20 Ill. Reg. 7605, effective May 22, 1996)

10.2 Attachment 2 - Example Certification by a Responsible Official

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

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

### 10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
  - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification
  - Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

### 3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



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

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

<b>Summary Of Application Contents</b>	
24.	<p>Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs:</p> <p>a) Non-attainment New Source Review – 35 IAC Part 203;  b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21;  c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?</p>
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	<p>Does the application identify and address all applicable emissions standards, including those found in the following:</p> <p>a) Board Emission Standards – 35 IAC Chapter I, Subtitle B;  b) Federal New Source Performance Standards – 40 CFR Part 60;  c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?</p>
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	<p>Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?</p>
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	<p>Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?</p>
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	<p>Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA?  Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.</p>
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	<p>If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?</p>
	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

<b>Signature Block</b>					
<p>This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.</p>					
30.	<p>I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.</p> <p>Authorized Signature:</p>				
	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <p>_____</p> <p style="text-align: center;">AUTHORIZED SIGNATURE</p> </td> <td style="width: 50%; border: none;"> <p>_____</p> <p style="text-align: center;">TITLE OF SIGNATORY</p> </td> </tr> <tr> <td style="border: none;"> <p>_____</p> <p style="text-align: center;">TYPED OR PRINTED NAME OF SIGNATORY</p> </td> <td style="border: none;"> <p>_____ / _____ / _____</p> <p style="text-align: center;">DATE</p> </td> </tr> </table>	<p>_____</p> <p style="text-align: center;">AUTHORIZED SIGNATURE</p>	<p>_____</p> <p style="text-align: center;">TITLE OF SIGNATORY</p>	<p>_____</p> <p style="text-align: center;">TYPED OR PRINTED NAME OF SIGNATORY</p>	<p>_____ / _____ / _____</p> <p style="text-align: center;">DATE</p>
<p>_____</p> <p style="text-align: center;">AUTHORIZED SIGNATURE</p>	<p>_____</p> <p style="text-align: center;">TITLE OF SIGNATORY</p>				
<p>_____</p> <p style="text-align: center;">TYPED OR PRINTED NAME OF SIGNATORY</p>	<p>_____ / _____ / _____</p> <p style="text-align: center;">DATE</p>				

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan Form 293-CAAPP, Compliance Plan/Schedule of Compliance for CAAPP Permit.
3. A completed compliance certification Form 292-CAAPP, Compliance Certification, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the Form 200-CAAPP, Application for CAAPP Permit and the Form 296-CAAPP, Compliance Certification. The boxes should be marked

yes on Form 200-CAAPP, Application for CAAPP Permit, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, Fee Determination for CAAPP Permit, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Page 4

Mail renewal applications to:

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

SIS:psj