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1.0 SOURCE IDENTIFICATION

1.1 Source

En-Chro Plating, Ltd.
2755 West Lake Street
Melrose Park, Illinois 60160
708/450-1250

I.D. No.: 031186AGQ
Standard Industrial Classification: 3471, Plating and Polishing

1.2 Owner/Parent Company

Milan M. Pecharich
18-236 71st Street
Westmont, Illinois 60559

1.3 Operator

En-Chro Plating, Ltd.
2755 West Lake Street
Melrose Park, Illinois 60160

Joe Villareal
708/450-1250

1.4 General Source Description

En-Chro Plating, Ltd., is located at 2755 West Lake Street in Melrose Park, Illinois. The source performs hard chrome plating of hydraulic shafting-rolls-cylinders, steel components, and assemblies, molds and dies. In addition, the source polishes items and performs electroless nickel plating as required.

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.]
ATU	Allotment Trading Unit
amp-hr	ampere-hour
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CMP	composite mesh pad
dscm	dry standard cubic meter
ERMS	Emissions Reduction Market System
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
lb	pound
mg	milligram
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
O & M	Operation and Maintenance
OSHA	Occupational Safety and Health Administration
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
SOP	Standard Operating Procedure
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit

T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
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:

Electroless Nickel Plating Tanks

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

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

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

3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

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

3.3 Addition of Insignificant Activities

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Hard Chromium Electroplating Tank #1	1991	Composite Mesh Pad System
02	Hard Chromium Electroplating Tank #2	5/1994	Composite Mesh Pad System
03	Hard Chromium Electroplating Tank #3	1991	Composite Mesh Pad System
04	Hard Chromium Electroplating Tank #4	1991	Composite Mesh Pad System
05	Hard Chromium Electroplating Tank #5	1991	Composite Mesh Pad System
06	Hard Chromium Electroplating Tank #6	1991	Composite Mesh Pad System
07	Hard Chromium Electroplating Tank #7	7/1995	Composite Mesh Pad System
08	Hard Chromium Electroplating Tank #8	7/1995	Composite Mesh Pad System

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 HAP emissions.

5.2 Applicable Regulations

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

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

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

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

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied

on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

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

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

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

5.2.4 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.

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

5.2.6 Episode Action Plan

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

- i. Illinois EPA, Compliance Section; and
- ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
- iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

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:

5.4.1 General Operation and Maintenance Requirements

The Permittee shall maintain and operate each emission unit or group of emission units at this source that is regulated by relevant standards or requirements pursuant to 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants for Source Categories, in accordance with "Operation and Maintenance Requirements" in 40 CFR 63.6(e). The emission units at this source that are subject to these requirements include hard chromium electroplating tanks, as addressed in Section 7.1 of this permit.

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)	--
Sulfur Dioxide (SO ₂)	--
Particulate Matter (PM)	9.42
Nitrogen Oxides (NO _x)	--
HAP, not included in VOM or PM	9.42
TOTAL	18.84

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is

readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. 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

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is

based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

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

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 Unit - Hard Chromium Electroplating Tanks
Control - Composite Mesh Pad Systems

7.1.1 Description

The electroplating tanks perform hard chrome plating of hydraulic equipment, steel components and assemblies, molds and dies. The chrome plating process generates hydrogen gas that has entrained droplets of chromic acid in it, which creates a mist. The ventilation system carries the mist through a mesh pad control system to remove chromic acid droplets by inertial impaction.

This source is a large, hard chromium electroplating facility because the maximum cumulative rectifier capacity is greater than or equal to 60 million ampere-hours per year.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Hard Chromium Electroplating Tank #1	Composite Mesh Pad System
02	Hard Chromium Electroplating Tank #2	Composite Mesh Pad System
03	Hard Chromium Electroplating Tank #3	Composite Mesh Pad System
04	Hard Chromium Electroplating Tank #4	Composite Mesh Pad System
05	Hard Chromium Electroplating Tank #5	Composite Mesh Pad System
06	Hard Chromium Electroplating Tank #6	Composite Mesh Pad System
07	Hard Chromium Electroplating Tank #7	Composite Mesh Pad System
08	Hard Chromium Electroplating Tank #8	Composite Mesh Pad System

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected chrome plating tank" for the purpose of these unit-specific conditions, is a hard chromium electroplating tank specified in Condition 7.1.2.
- b. The affected chrome plating tanks are subject to the National Emission Standards for Hazardous Air

Pollutants (NESHAP) for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR 63, Subparts A and N. The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

- c. The affected chrome plating tanks are 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 new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.1.4 Non-Applicability of Regulations of Concern

None

7.1.5 Operational Limits and Work Practice Standards

- a. Air pollution control equipment associated with an affected chrome plating tank shall be operated at all times during tank operation, including periods of startup and shutdown.
- b. Pursuant to 40 CFR 63.342(f)(1), the Permittee is subject to these work practice standards.
 - i. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by Condition 7.1.5(c).
 - ii. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by Condition 7.1.5(c).

- iii. Operation and maintenance requirements established pursuant to Section 112 of the CAA are enforceable independent of emissions limitations or other requirements in relevant standards.
- c. The Permittee shall develop and implement an operation and maintenance (O & M) plan for the affected chrome plating tanks which shall include at least the following, pursuant to 40 CFR 63.342(f)(3):
 - i. Description of the operation and maintenance criteria for the control device(s) and monitoring equipment.
 - ii. A checklist to document the operation and maintenance of the equipment.
 - iii. Required work practice standards, pursuant to 40 CFR 63.342(f) (Condition 7.1.8).
 - iv. Procedure to follow to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
 - v. Procedure for identifying malfunctions and for implementing corrective actions.
- d. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.
- e. The Permittee may use applicable Standard Operating Procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans or other existing plans as part of the operation and maintenance plan, provided the alternative plans meet the requirements of Condition 7.1.5(c).
- f. The standards in Condition 7.1.6 that apply to chromic acid baths shall not be met by using a

reducing agent to change the form of chromium from hexavalent to trivalent.

7.1.6 Emission Limitations

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

- a. The concentration of total chromium in each exhaust gas stream discharged to the atmosphere from the affected chrome plating tanks shall not exceed the following limits, pursuant to 40 CFR 63.342(c)(1):

<u>Equipment</u>	<u>Chromium Emissions (mg/dscm)</u>
New and Existing Tanks at a Large Hard Chromium Electroplating Facility	0.015

This limit is based on the maximum cumulative potential rectifier capacity of all hard chrome electroplating tanks at his source being greater than 60 million ampere-hours per year. An electroplating tank installed before December 16, 1993, is considered as existing tank.

Compliance with this limit shall be determined from initial performance testing and ongoing compliance monitoring requirements, as required by this permit.

7.1.7 Testing Requirements

- a. Within 180 days of initial startup, the chromium emissions of the affected chrome plating tank shall be tested in accordance with 40 CFR 63, Subpart N to demonstrate compliance, pursuant to 40 CFR 63.343(b).
- b. The following test methods and procedures shall be used for performance testing, pursuant to 40 CFR 63.344(c). Refer to 40 CFR 63, Appendix A, for USEPA test methods. Alternate test methods may be used as specified in 40 CFR 63.344(c)(2) and (4).

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Chromium	USEPA Method 306 or 306A

- c. During initial performance testing, the site specific "operating parameter value", i.e., range of pressure

drop data across the composite mesh pad systems shall be established to demonstrate continuous compliance, pursuant to 40 CFR 63.343(c). Pressure drop range can be established from the highest and lowest value during multiple performance testing or \pm 1 inch of H₂O column about the average pressure drop measured during the three compliant test runs of one performance test.

- d. The Permittee shall follow the procedures of 40 CFR 63.344(d) to establish site-specific operating parameter values and to install monitoring equipment.

7.1.8 Inspection and Monitoring Requirements

- a. The operation and maintenance practices required by 40 CFR 63.342(f) (See Condition 7.1.5(b) and (c)) shall be implemented for control systems used on the affected chrome plating tanks, including the following work practice standards for the composite mesh pad control system(s):
 - i. A quarterly visual inspection of the composite mesh pad (CMP) system to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
 - ii. A quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure that there is no breakthrough of chromic acid mist.
 - iii. A quarterly visual inspection of the duct work from the tank(s) to the composite mesh pad scrubber(s) to ensure there are no leaks.
 - iv. Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations.
- b. On and after the date on which the initial performance test required to be completed (see Condition 7.1.7), the Permittee shall monitor and record the pressure drop across the composite mesh-pad system once each day that the affected chrome plating tank is operating.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected chrome plating tanks to demonstrate compliance with Conditions 5.5.1, 7.1.5, and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall keep the records required by 40 CFR 63.346(b) to demonstrate compliance with 40 CFR 63, Subpart N, including the following:
 - i. Inspection records for the control device and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of 40 CFR 63.342(f) have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.
 - ii. Records of all maintenance performed on the affected chrome plating tanks, as related to emissions, the associated control system, and monitoring equipment.
 - iii. Records of the occurrence, duration, and cause (if known) of each malfunction of the affected chrome plating tanks, associated control system, and monitoring equipment.
 - iv. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan required by 40 CFR 63.342(f)(3), pursuant to 40 CFR 63.342(f)(3)(iv).
 - v. Records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3).
 - vi. Copies of test reports documenting results of all performance tests and all measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the

special compliance procedures of 40 CFR 63.344(e).

- vii. Records of monitoring data required by 40 CFR 63.343(c) (See Condition 7.1.8) that are used to demonstrate compliance with the standard including the date and time the data are collected.
 - viii. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data. Records of excess emissions that occurs during malfunction of the process, control, or monitoring equipment.
 - ix. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data. Records of excess emissions that occurs during periods other than malfunction of the affected chrome plating tanks and associated control device or monitoring equipment.
 - x. Records for the total process operating time of the affected chrome plating tanks during the reporting period.
 - xi. Records demonstrating the maximum cumulative potential rectifier capacity, if hard chrome electroplating is less than 60 million ampere-hours per year, or of the actual cumulative rectifier capacity of hard chromium electroplating tank(s) at a facility expended during each month and the total capacity expended semiannually.
 - xii. Copies of the notifications and reports required by 40 CFR Parts 63.9, 63.10, and 63.347 (Condition 7.1.10), with supporting documentation.
 - xiii. All records shall be retained for a period of five years, pursuant to 40 CFR 63.10(b)(1).
- b. The Permittee shall keep the written operation and maintenance plan (See Condition 7.1.5) on record after it is developed to be made available for inspection, upon request, by the Illinois EPA and/or USEPA for the life of the affected chrome plating

tanks or until the chrome plating tanks are no longer subject to the provisions of 40 CFR 63 Subpart N. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Illinois EPA and/or USEPA for a period of 5 years after each revision to the plan.

7.1.10 Reporting Requirements

- a. Prior to carrying out the tests required by Condition 7.1.7, the Illinois EPA shall be notified in writing a minimum of sixty (60) calendar days prior to the scheduled date of these tests with the exact date, time, and place of these tests, to enable the Illinois EPA to observe these tests, pursuant to 40 CFR 63.347(d)(1).
- b. If the scheduled date for the test required by Condition 7.1.7 is changed for unforeseen reasons, the Permittee shall inform the Illinois EPA within five (5) working days of the originally scheduled test date and must specify the date of the rescheduled test. Observation of the performance test by the Illinois EPA is optional.
- c. Three (3) copies of the Final Report(s) for performance tests and compliance status shall be submitted to the Illinois EPA within 90 calendar days after the performance test, pursuant to 40 CFR 63.347(f)(2) and 63.347(e)(3). If testing is not required, the report of compliance status shall be submitted no later than 30 days after initial startup. The Final Report shall include, pursuant to 40 CFR 63.344(a):
 - i. General information, i.e., date of test, testing personnel and observers, if any.
 - ii. A summary of test results and compliance status.
 - iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - iv. Detailed description of test conditions, including:

- A. Process information, i.e., mode(s) of operation, process weight rate, e.g. raw material consumption, rectifier operating rate.
 - B. Sampling and analytical procedures and any modifications to standard procedures.
 - C. Control equipment record of pressure drop range across the composite mesh pad systems to demonstrate continuous compliance.
 - D. A discussion of any preparatory actions taken, i.e., standard preparation, inspections, maintenance, and repair.
 - E. A discussion of calibration procedures.
- v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vi. An explanation of any discrepancies among individual tests or anomalous data.
 - vii. Quality assurance procedures and results.
 - viii. Any additional information required by the test method.
- d. The Permittee shall comply with the compliance reporting requirements of 40 CFR 63.347(e), including the following:

A notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the affected chrome plating tank has complied with 40 CFR 63 Subpart N, pursuant to 40 CFR 63.347(e)(2). The notification shall be submitted no later than 90 days following completion of the initial performance test required by Condition 7.1.7 and shall list the following:

- i. The applicable emission limitation and the methods that were used to determine compliance with this limitation.
- ii. The performance test report documenting the results of the performance test, which

contains the elements required by 40 CFR 63.344(a), including measurements and calculations to support the special compliance provisions of 40 CFR 63.344(e) if these are being followed, pursuant to 40 CFR 63.344(e)(5).

- iii. The type and quantity of hazardous air pollutants emitted by the source reported in mg/dscm or mg/hr if the source is using the special provisions of 40 CFR 63.344(e) to comply with the standards.
 - iv. The specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit, pursuant to 40 CFR 63.343(c).
 - v. The methods that will be used to determine continuous compliance.
 - vi. A description of the air pollution control technique for each emission point.
 - vii. A statement that the Permittee has completed and has on file the operation and maintenance plan as required by the work practice standards of 40 CFR 63.342(f).
 - viii. If the Permittee is determining facility size based on actual cumulative rectifier capacity in accordance with 40 CFR 63.342(c)(2), records to support that the facility is small. For existing sources, records from any 12-month period preceding the compliance date shall be used or a description of how operations will change to meet a small designation shall be provided.
 - ix. A statement by the Permittee as to whether the affected chrome plating tank has complied with the provisions of 40 CFR Part 63, Subpart N.
- e. The Permittee shall submit ongoing compliance status reports documenting the ongoing compliance status to the Illinois EPA every six months, pursuant to 40 CFR 63.347(g). If the Permittee exceeds the emission limits as indicated during monitoring, ongoing compliance status reports shall be submitted once every quarter. To reduce the frequency of ongoing

compliance status reports, the procedures in 40 CFR 63.347(g)(2) shall be followed.

- f. The Permittee shall report the results from each monitoring device. However, when one monitoring device is used as a backup for the primary monitoring device, the Permittee shall only report the results from the monitoring device used to meet the monitoring requirements. If both devices are used to meet these requirements, then the Permittee shall report the results from each monitoring device for the relevant compliance period.
- g. The ongoing compliance status report shall contain the following:
 - i. The company name and address of the source performing hard chrome electroplating.
 - ii. An identification of the operating parameter(s) that is monitored for compliance determination, as required by 40 CFR 63.343(c).
 - iii. The relevant emission limitation for the affected chrome plating tanks, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status, as required by 40 CFR 63.347(e)(2).
 - iv. The beginning and ending dates of the reporting period.
 - v. A description of the type of process performed in the affected chrome plating tanks.
 - vi. The total operating time of the affected chrome plating tanks during the reporting period.
 - vii. The actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis, if the Permittee limits the maximum cumulative potential rectifier capacity less than 60 million amp-hr/yr.
 - viii. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as

indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.

- ix. A certification by a responsible official that the work practice standards of 40 CFR 63.342(f) were followed in accordance with the operation and maintenance plan for the source.
 - x. If the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40 CFR 63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed.
 - xi. A description of any changes in monitoring, processes, or controls since the last reporting period.
 - xii. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
 - xiii. The date of the report.
- h. If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by Condition 7.1.5, the Permittee shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with the Illinois EPA and/or USEPA.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter emission limit in Condition 7.1.3(c) is assured by proper operation of the affected chrome plating tanks and associated control equipment, as required by work practice standards in Condition 7.1.5.
- b. Compliance with the chromium emission limit in Condition 7.1.6 shall be determined by the monitoring required by Condition 7.1.8. To be in compliance, the composite mesh-pad system(s) shall be operated within + 1 inch of water column of the pressure drop established during the initial performance test, or shall be operated within the range of compliant valves for pressure drop established during multiple performance tests. Failure to operate in accordance with the operating parameter value(s), determined during initial performance testing, shall be considered a violation of the limit in Condition 7.1.3, pursuant to 40 CFR 63, Subpart N.

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 April 19, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

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

- i. Illinois EPA - Air Compliance Section

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

 - ii. Illinois EPA - Air Regional Field Office

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

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

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

 - iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or

misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Particulate Matter Emissions from Process Emission Units

10.1.1 Section 212.321 Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

- a. Except as further provided in 35 IAC Part 212, 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; and
E = Allowable emission rate; and,

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

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

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

	Metric	English
P	Mg/hr	Ton/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 Mg/hr	E kg/hr	P Ton/hr	E 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 Mg/hr or Ton/hr, and
 E = Allowable emission rate in kg/hr or lbs/hr.

10.1.2 Section 212.322 Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972.

- a. Except as further provided in 35 IAC Part 212, 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; and,
E = allowable emission rate; and,

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

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

- ii. For process weight rates in excess or 27.2 Mg/hr (30 Ton/hr):

	Metric	English
P	Mg/hr	Ton/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 Mg/hr	E kg/hr	P Ton/hr	E 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
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 Ton/hr, and
E = Allowable emission rate in kg/hr or lbs/hr.

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: _____

JS:psj

I. INTRODUCTION

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

En-Chro Plating, Ltd., is located at 2755 West Lake Street in Melrose Park, Illinois. The source performs hard chrome plating of hydraulic shafting-rolls-cylinders, steel components, and assemblies, molds and dies. In addition, the source polishes items and performs electroless nickel plating as required.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Hard Chromium Electroplating Tank #1	1991	Composite Mesh Pad System
02	Hard Chromium Electroplating Tank #2	5/1994	Composite Mesh Pad System
03	Hard Chromium Electroplating Tank #3	1991	Composite Mesh Pad System
04	Hard Chromium Electroplating Tank #4	1991	Composite Mesh Pad System
05	Hard Chromium Electroplating Tank #5	1991	Composite Mesh Pad System
06	Hard Chromium Electroplating Tank #6	1991	Composite Mesh Pad System
07	Hard Chromium Electroplating Tank #7	7/1995	Composite Mesh Pad System
08	Hard Chromium Electroplating Tank #8	7/1995	Composite Mesh Pad System

III. EMISSIONS

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

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	--
Sulfur Dioxide (SO ₂)	--
Particulate Matter (PM)	9.42
Nitrogen Oxides (NO _x)	--
HAP, not included in VOM or PM	9.42
TOTAL	18.84

IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

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

Title I

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

the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

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

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

JS:psj