

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

The Knapheide Manufacturing Co.
Attn: Bernie Ott
3109 North 30th Street
Quincy, Illinois 62301

Application No.: 98090055 I.D. No.: 001806AAT
Applicant's Designation: DESIGNATION Date Received: September 18, 1998
Operation of: Manufacturing of Truck Equipment
Date Issued: December 2, 1999 Expiration Date²: December 2, 2004
Source Location: 3109 North 30th Street, Quincy
Responsible Official: Harold E. Marcionetti, V.P. of Operations

This permit is hereby granted to the above-designated Permittee to OPERATE a truck equipment manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:DGP:psj

cc: Illinois EPA, FOS, Region 2
USEPA

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

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

The Knapheide Manufacturing Co.
3109 North 30th Street
Quincy, Illinois 62301
217/222-7131

I.D. No.: 001806AAT
Standard Industrial Classification: 3713, Truck and Bus Bodies

1.2 Owner/Parent Company

The Knapheide Manufacturing Co.
3109 North 30th Street
Quincy, Illinois 62301

1.3 Operator

The Knapheide Manufacturing Co.
3109 North 30th Street
Quincy, Illinois 62301

Contact Person's Name
Bernie Ott, Environmental Engineer
217/222-7131

1.4 General Source Description

The Knapheide Manufacturing Co. principal manufacturing operation is located at 3109 North 30th Street in Quincy. A secondary operation (site) is located at 436 South 6th Street. The source fabricates truck equipment accessories and the principal pollutant emitting process is coating of the parts, which result in VOM emissions.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
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
ft ³	cubic feet
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kW	kilowatts
lb	pound
m	million
mmBtu	Million British thermal units
mo	month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit 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
wt. %	weight percent
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:

Nine make-up air units, 3.025 mmBtu/hr, each
One make-up air unit, 3.0 mmBtu/hr
E-Coat Resin Storage Tank
Boiler for E-Coat
Welding
Metal forming process such as shearing, milling, punching, forming and grinding
Controlled pyrolysis cleaning machine
Wood saw and drill. Unit has cyclone/baghouse but emissions would be under 1.0 lb/hr without control. Control vents indoors.

- 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)].

Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or blended contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].

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).

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
PB-1	Paint Booth 1 with Flash Tunnel and Bake Oven	1997	Filter
PB-2	Paint Booth 2 with Flash Tunnel and Bake Oven	1997	Filter
PB-3	Paint Booth 3	1997	Filter
PB-4	Paint Booth 4 with Bake Oven	1997	Filter
PB-5	Paint Booth 5 with Bake Oven	1997	Filter
Tool Box PB	Tool Box Paint Operation Consisting of Prime Spray Booth, Topcoat Spray Booth, Two Flash Tunnels and a Bake Oven	1998	Filters on Prime and Topcoat Spray Booth
E-Coat	Electrocoat Line including Stages for Cleaning and a Bake Oven	1997	None
HW	Hand Wiping	1997	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 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 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

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)	159.70
Sulfur Dioxide (SO ₂)	0.06
Particulate Matter (PM)	5.05
Nitrogen Oxides (NO _x)	8.97
HAP, not included in VOM or PM	
TOTAL	173.8

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.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating HAP Emissions

For the purpose of estimating HAP emissions from equipment at the source, the weight percent of each HAP for each product times the VOM emissions contributed by that product is acceptable.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Cleaning and Coating Operations
Control Filters

7.1.1 Description

The coating process generally consists of cleaning, prime coating/curing and then top coating/curing. The E-coat line consists of various stages in which cleaning is first done, then a rinse and finally the actual electrocoat primer followed by curing. Since the whole line is a dip process, no PM is generated. Some parts that are too large for the dip tanks are spray primed. The topcoat booths are spray operations and do emit PM. Paint booths 4 and 5 use the same bake oven. All of the coated materials are exposed to outdoor weather and thus qualify as using an extreme performance coating.

The E-coat bake oven is capable of generating glycol ethers during the curing process that are not part of the original E-coat raw material. Glycol ethers are HAPs as well as VOMs.

Purge or "gun cleaning" solvents are used to clean out lines during color changes.

Tool box manufacturing including coating is at the secondary site.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
PB-1	Paint Booth 1 with Flash Tunnel and Bake Oven Part/Coating/Type: Utility Body Undercoating and Prime Spray	Filter
PB-2	Paint Booth 2 with Flash Tunnel and Bake Oven Part/Coating/Type: Side Assembly Top Coat Spray	Filter
PB-3	Paint Booth 3 Part/Coating/Type: Platform Undercoating, Spray	Filter
PB-4	Paint Booth 4 with Bake Oven Part/Coating/Type: Platform Topcoat, Spray	Filter

Emission Unit	Description	Emission Control Equipment
PB-5	Paint Booth 5 uses same Bake Oven as PB-4 Part/Coating/Type: Large Product Prime Coat and Utility Body & Miscellaneous Topcoat, Spray	Filter
Tool Box PB	Tool Box Paint Operation Consisting of Prime Spray Booth, Topcoat Spray Booth, Two Flash Tunnels and a Bake Oven	Filters on Prime and Topcoat Spray Booth
E-Coat	Electrocoat Line including Stages for Cleaning and a Bake Oven Part/Coating/Type: Cleaning and Prime Coat for most parts, Dip Tank	None
HW	Hand Wiping	None

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 a spray booth and drying oven or electrocoat dip tank and drying oven which is used to apply coating to a metal substrate. As of the "date issued" as shown on page 1 of this permit, the affected coating lines are identified in Condition 7.1.2.
- b. Each affected coating line is subject to the 35 IAC 212.321(a), which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

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

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

Where:

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

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

Note that for a process weight rate below 100 lb/hour (0.05 tons/hour) the allowable is 0.55 lb/hour. For coating operations the process weight rate is the weight of the coating only; it does not include the weight of the steel product.

c. Each affected coating line at the source is subject to 35 IAC 215.204(j)(3) for extreme performance coatings 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. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/liter</u>	<u>lbs/gallon</u>
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.

d. The cleaning stages of the E-coat line and the hand wiping with cleaning solvent operation are both subject to 35 IAC 215.301. This rule states that no person shall cause or allow the discharge of more than 8 lb/hr of a photochemically reactive organic material into the atmosphere from any emission unit (935 IAC 218.301). The exception cited by the rule does not apply to the Permittee, since the Permittee does not have VOM emission control equipment.

7.1.4 Non-Applicability of Regulations of Concern

Each affected coating line is not subject to 35 IAC 215.301, Use of Organic Material, pursuant to 35 IAC 215.209, Exemption From General Rule on Use of Organic Material which excludes affected coating lines from this requirement.

7.1.5 Operational and Production Limits and Work Practices

- a. The drying ovens shall only be operated with natural gas as the fuel.
- b. i. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- ii. 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, the affected coating line is subject to the following:

- a. Usages of coating on a "water excluded" and "as applied" basis, VOM content of coatings (water excluded) and VOM emissions shall not exceed the following [T1R]:

<u>Type</u>	<u>Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Content</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Spray	8,400	70,000	3.0 ^a	12.6	105.0
E-Coat	7,000	60,000	1.0 ^a	3.5	30.0

^a For calculation purposes. For determining compliance the allowable is 3.5.

- b. Usage of hand wiping solvent and VOM emissions shall not exceed the following [T1R]:

<u>Usage</u>		<u>VOM Emissions</u>	
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
0.6	5.3	0.6	5.3

The usage rate was based on the solvent being 100% VOM. If a solvent is used that is not 100% VOM, the usage may be calculated as total weight used times weight percent VOM.

- c. Usage of E-coat cleaning agent and VOM emissions shall not exceed the following [T1R]:

Usage (Ton/Mo) (Ton/Yr)		VOM Emissions (Ton/Mo) (Ton/Yr)	
0.3	3.2	0.4	3.2

The usage rate was based on the E-coat cleaning agent being 100% VOM. If a cleaning agent is used that is not 100% VOM, the usage may be calculated at total weight used times weight percent VOM. For instance, the VOM content of the cleaning agent at the time of submittal of the original application was 3.2 weight percent so 9.3 tons/month of cleaning agent may be used. The VOM may be emitted in either Stage 1 or Stage 2 of the cleaning process.

- d. Usage of purge or gun cleaning solvent and VOM emissions shall not exceed the following [T1R]:

Usage ^a (Gal/Mo) (Gal/Yr)		VOM Emissions ^b (Ton/Yr)
2,100	18,900	16.2

^a Solvent is a combination of fresh material that is 100% methyl ethyl ketone (MEK) and material returned from recycler which includes some of the coating solvent from the previous shipment. Usage is total of both.

^b The calculation was based on a 25% loss factor. There is no VOM emission limit per month because amount recycled can vary significantly. There could be two shipments in one month and none in others. Calculated emissions could actually be negative for some months due to two shipments and also the flushed out coating is counted as solvent recycle when it is in reality coating recycle.

- e. These values are based on usages presented in the application and for coatings the VOM content allowed pursuant to Condition 7.1.3(c).

- f. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). The months do not have to be calendar months. The Permittee's "accounting" months consisting of 4, 4 and 5 week periods are acceptable.

- g. The above limitations contain revisions to previously issued construction permit 95110091. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically with 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits supersede the limitations established in this construction permit and are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the construction permit limit was for the purpose of making the operation a minor source for CAAPP permitting purposes. After startup of the source it was discovered that HAPs not present in the E-coat coatings can form in the bake oven. Since HAP emissions make the source major, the Permittee has requested to also be major for VOM. The new limit for coatings is also an aggregate value verses individual operation limitations in the construction permit.

7.1.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 215.105(a), 215.211(a), and Section 39.5(7)(b) of the Act]

- a. Upon a reasonable written request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105(a), 215.208, and 215.211(a).
 - i. The VOM content of representative coatings "as applied" on the affected coating line shall be

determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105(a).

- ii. 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(a) and (b) directly reflect the application of such material and separately account for any additions of solvent.

[35 IAC 215.105(a), 215.208, and 215.211(a)]

- b. The Permittee may use emission factors for HAP emission from the E-coat bake oven as supplied by the E-coat manufacturer as these HAPs are reportedly formed during the baking process and cannot be determined by an analysis of the coating in the dip tank. The currently promulgated emission factors are stated in Condition 7.1.12(d) but may be modified by the supplier.

- c. i. Unused waste materials (e.g. obsolete coating colors) in unopened containers may be assumed to have the same composition as when originally received and do not have to be tested for VOM content.

- ii. Other materials, such as E-coat cleaning agent, that are periodically drained must have the VOM content determined according to USEPA Test Methods, Physical/Chemical Methods (SW-846), Test Method 8260 or equivalent.

- iii. If after three analysis of waste E-coat cleaning agent material is performed, a consistent value is obtained (e.g. 1-2% VOM), and the credit for waste is less than 4 tons per year, further analysis do not have to be performed unless a written request is made by the Illinois EPA.

- iv. An analysis must also be performed on purge/gun cleaning solvent that is sent for recycling. This analysis may be performed by the recycling agent that recovers the solvent and returns it to the Permittee. If the Permittee's material is isolated, i.e. not mixed with other coaters materials, the amount may be determined by a material balance and an

analysis need not be performed. For example, if 3,500 pounds of contaminated solvent is sent to the recycler where the solvent is distilled off, 750 pounds of solids remain after distillation and 2,700 pounds are returned, the 2,700 pounds is considered the amount recycled. Distillation losses would have to be considered as the Permittee's emission losses. There is no specific rule limit for this process, only a permit limit based on expected usage.

7.1.8 Inspection Requirements

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

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for all coating lines combined to demonstrate compliance with Conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

- a.
 - i. The name and identification number of each coating as applied on the affected coating lines;
 - ii. The usage of each coating, in units of gallons/month and gallons/year.
 - iii. 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 month on all of the affected coating lines.
- b.
 - i. The name and identification number of each cleaning agent used in the E-coat cleaning stages, of each solvent used for hand wiping, and of each purge solvent used for gun cleaning.

- ii. The usage of each E-coat cleaning agent, hand wiping solvent and purge solvent, in units of tons/month and tons/year.¹
 - iii. The weight of VOM per pound of each E-coat cleaning agent, wiping solvent and purge solvent used in the E-coat cleaning and hand wiping processes.
 - iv. Weight of waste solvent sent offsite for recycle and calculation of the VOM content by analysis or material balance.
- c. VOM emissions from the E-coat cleaning, wiping and coating processes as calculated from the information in Condition 7.1.9(a) and (b) and the calculation method in Condition 7.1.12.
 - d. Records of the testing of VOM and HAP content (wt. %) of each coating, E-coat cleaning agent, and waste 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; and
 - iii. Documentation of analysis methodology.
 - e. Wiping solvents do not have to be tested if an assumption of 100% VOM is used. The density from an MSDS may be used for lb/gal.
 - f. Records of all mixing operations in which one material has a VOM content greater than 3.5 lb/gal. E.g. addition of hardener and reducer/thinner to a coating. Records must include a calculation of post-mixing VOM content or a chart can be prepared demonstrating a maximum amount of thinner than can be added in order for the VOM content to remain below 3.5 lb/gal. If the chart is used the records must show that the mix ratio is less than the chart value. Records are not

¹ Since the maximum expected emission rate from Stage 1 and Stage 2 of the E-coat line, which emit VOM while cleaning the metal, are less than 1.0 lb/hr, records do not have to be kept demonstrating hourly usage or emission rate to verify compliance with Condition 7.1.3(d). Only monthly values are required. The records may be kept on a volume basis rather than weight basis provided that the density is known for conversion purposes.

required of the mix ratio when mixing components for which all are below 3.5 lb VOM/gal. Records are not required for the addition of water, or VOM exempt compounds.

- g. Results of filter inspections and dates the replacements were made.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected coating lines 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:

Any record showing a violation of Condition 7.1.3(c), 7.1.6 or an exceedance of Condition 5.5.1 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation. If a violation is discovered at the end of the month when calculations or review of materials used is performed, the violation is considered to have occurred at the end of the month and the Permittee has 30 days from that date to submit the report.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to affected coating lines 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, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected coating lines remain in compliance, with the VOM content requirements.

7.1.12 Compliance Procedures

- a. For each coating:

$$\text{VOM Emissions (lb/mo)} = \text{Volume of Coating (gal/mo)}^1 \times \text{VOM Content (lb/gal)}^1$$

b. For each E-coat cleaning agent:

VOM Emissions (lb/mo) = Volume of E-Coat Cleaning Agent (gal/mo)¹ x VOM Content (lb/gal)¹ - Credit for VOM in waste as calculated by f below

c. For wiping solvent:

VOM Emissions (lb/mo) = Volume of Wiping Solvent (gal/mo) x Density (lb/gal)

d. For HAPs generated by E-coat bake oven:

HAPs ² (lb/mo) = Resin Usage (gal/mo) x 0.62 lb/gal + Paste Usage (gal/mo) x 1.10 lb/gal

e. For gun cleaning (purge) solvent:

VOM Emissions (lb/mo) = Volume of Purge Solvent (gal/mo) x Density (lb/gal) - Credit for VOM in waste as calculated by f below

f. Credit for VOM in waste:

VOM Credit (lb/mo) = VOM Waste Sent Offsite (lb/mo) x VOM Content of Waste (wt. %)³

g. Total VOM (lb/mo) = VOM from all coatings combined + VOM from all E-Coat Cleaning Agents Combined + VOM from All Wiping Solvents Combined + VOM from Purge Solvent + HAPs Generated in E-coat Bake Oven That Are Also VOMs - Credit from VOM in Waste

h. PM emissions for each spray booth:

PM Emissions (lb/mo) = 0.0003 grains/ft³ ⁴ x Air Flow Rate (ft³/min) x 60 min/hour x hours of operation ÷ 7000 grains/lb

i. Compliance with Condition 7.1.3(b) may be assumed by proper operation and replacement of filters as needed.

j. Combustion emissions from bake ovens for paint booth 1 through 3 and E-coat:

Fuel combustion emissions from the affected ovens shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(Lb/Mft³)</u>
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 - <10 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, 5th Edition, March 1998. VOM emission factor based on TOC factor corrected for 52% methane contribution.

Oven Emissions (lb) = (Natural Gas Consumed, Mft³) x (The Appropriate Emission Factor, lb/Mft³)

¹ Minus water and exempt compounds.

² Also a VOM.

³ An alternative material balance approach by the recycler as described in Condition 7.1.7(c)(iv) may also be used.

⁴ Average typical calculated outlet grain load.

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 January 11, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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 without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

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

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

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

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

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

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

- i. Illinois EPA - Air Compliance Section

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

- ii. Illinois EPA - Air Regional Field Office

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

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)(p)(ii) of the Act]:

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

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment specified in Condition 7.1.2. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain

compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records

required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

DGP: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. Unlike this source's current state operating permit(s), the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Knapheide Manufacturing Co. is located at 3109 North 30th Street in Quincy. The source fabricates truck equipment accessories and the principal pollutant emitting process is coating of the parts, which result in VOM emissions.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Emission Control Equipment
PB-1	Paint Booth 1 with Flash Tunnel and Bake Oven	Filter
PB-2	Paint Booth 2 with Flash Tunnel and Bake Oven	Filter
PB-3	Paint Booth 3	Filter
PB-4	Paint Booth 4 with Bake Oven	Filter
PB-5	Paint Booth 5 with Bake Oven	Filter
E-Coat	Electrocoat Line including Stages for Cleaning and a Bake Oven	None
HW	Hand Wiping	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	116.0
Sulfur Dioxide (SO ₂)	0.1
Particulate Matter (PM)	3.9
Nitrogen Oxides (NO _x)	8.6
HAP, not included in VOM or PM	
TOTAL	128.6

The Source has requested that the Illinois EPA establish conditions in the CAAPP permit that allow various refinements from the conditions of the construction permit(s), consistent with the information provided in the CAAPP application. In addition, the Source has requested emission limits above that allowed in the previously issued construction permit(s), and has addressed the applicability and compliance of 35 IAC Part 203, "Major Stationary Sources Construction and Modification" and/or 40 CFR 52.21, federal "Prevention of Significant Deterioration". These limits continue to ensure that the construction and/or modification addressed in the construction permit(s) does not constitute a new major source or major modification pursuant to these rules. These limits supersede the limitations established in the construction permit(s) and the information in the CAAPP application contains the most current and accurate information for the source as further detailed in the CAAPP permit.

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

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish 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 to demonstrate that the source is operating in accordance with the requirements of the permit.

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.

DGP:jar