

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Tower Automotive Products, Inc.
2934 East 126th Street
Chicago, Illinois 60633

Illinois EPA ID Number: 031600GOA

Application Number: 05110047

Application Type: Initial Permit

Start of Public Comment Period: March 14, 2007

Close of Public Comment Period: April 13, 2007

Permit Engineer/Technical Contact: Ross Cooper, 217/782-2113

Community Relations/Comments Contact: Brad Frost, 217/782-7027

(This Project Summary generally describes the source and explains the draft permit. This document has been prepared pursuant to Section 39.5(8)(b) of the Illinois Environmental Protection Act, which requires "a statement that sets forth the legal and factual basis for the draft CAAPP permit conditions.")

I. INTRODUCTION

This source has applied for an initial Clean Air Act Permit Program (CAAPP) operating permit. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by Title V of the federal Clean Air Act and Section 39.5 of Illinois' Environmental Protection Act. The conditions in a CAAPP permit are enforceable by the Illinois Environmental Protection Agency (Illinois EPA), the USEPA, and the public. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A CAAPP permit contains conditions identifying the applicable state and federal air pollution control requirements that apply to a source. The permit also establishes emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include 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. Further explanations of the specific provisions of the draft CAAPP permit are contained in the attachments to this document, which also identify the various emission units at the source.

For purposes of the CAAPP, Tower Automotive Products Company, Inc. is considered a single source with Ford Motor Company - Chicago Assembly Plant, I.D. No. 031600AAR, located at 12600 South Torrence Avenue, Chicago, Cook County. Due to the single source relationship, Tower Automotive Products Company, Inc. is also considered a major source of HAPs and VOM. A major source of HAPs may be subjected to National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements, specifically in this case Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63 Subpart Mmmm). Additionally, the facility performs a variety of metal stamping operations that utilize a water based drawing lubricant. Drawing lubricant application is a very similar process to a coating operation, and in this case has a very similar VOM content because it is water based, therefore applying the Part 218 coating regulations is appropriate. The CAAPP permit also addresses the applicability of 40 CFR 63 Subpart Mmmm whereas the original joint construction and operating permit (Application No. 03010072) did not.

II. GENERAL SOURCE DESCRIPTION

a. Nature of source

The source operates stamping presses and an adhesive/sealant coating operation. Pollution control devices at this source include the use of four Torit downflo dust

collectors used to control PM for the welding operations. There are no VOM control devices in use.

b. Ambient air quality status for the area

The source is located in an area that is currently designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment) and/or PM_{2.5} and attainment or unclassifiable for all other criteria pollutants (carbon monoxide, lead, nitrogen dioxide, PM₁₀, sulfur dioxide).

c. Major source status

1. The source requires a CAAPP permit as a major source of volatile organic material (VOM) and hazardous air pollutant (HAP) emissions.
2. The source also requires a CAAPP permit because the source is subject to a standard, limitation, or other requirement under Section 111 (NSPS) or Section 112 (HAPs) of the CAA for which USEPA requires a CAAPP permit, or because the source is in a source category designated by the USEPA. Specifically, this source is subject to 40 CFR 63 Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products.
3. The source also requires a CAAPP permit because the source is considered a single source with Ford Motor Company - Chicago Assembly Plant, I.D. No. 031600AAR, located at 12600 South Torrence Avenue, Chicago, Cook County. The Permittees have elected to obtain separate CAAPP permits for their operations.

d. Source Emissions

The following table lists annual emissions of criteria pollutants from this source, as reported in the Annual Emission Reports sent to the Illinois EPA.

Pollutant	Annual Emissions (tons)				
	2005	2004	2003	N/A	N/A
CO	---	---	---	---	---
NO _x	---	---	---	---	---
PM	---	---	---	---	---
SO ₂	---	---	---	---	---
VOM	0.52	0.27	0.50	---	---
(top HAP)	---	---	---	---	---

III. NEW SOURCE REVIEW/TITLE I CONDITIONS

This draft permit contains terms and conditions that address the applicability of permit programs for new and modified sources under Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the draft permit by T1, T1R, or T1N. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this draft permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new conditions or revise such conditions in a Title I permit, those conditions are consistent with the information provided in the CAAPP application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This draft permit would not establish any new Title I requirements or revised Title I requirements.

IV. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source. In addition, the draft permit requires the source to certify its compliance status on an annual basis.

V. PROPOSED ILLINOIS EPA ACTION/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 by the Illinois EPA for the draft or proposed permit, pursuant to 35 IAC Part 252 and Sections 39.5(8) and (9) of the Illinois Environmental Protection Act. A final decision on the draft or proposed permit will not be made until the public, affected states, and USEPA have had an opportunity to comment. The Illinois EPA is not required to accept recommendations that are not based on applicable requirements. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.

ATTACHMENT 1: Summary of Source-Wide Requirements

The following table indicates the source-wide emissions control programs and planning requirements that are applicable to this source. These programs are addressed in Sections 5 and 6 of the draft permit.

Program/Plan	Applicable
Emissions Reduction Market System (ERMS) ¹	x
Nitrogen Oxides (NO _x) Trading Program	-
Acid Rain Program	-
Compliance Assurance Monitoring (CAM) Plan	-
Fugitive Particulate Matter (PM) Operating Program ²	x
Risk Management Plan (RMP)	-
PM ₁₀ Contingency Measure Plan	-

1. The ERMS is a market-based program designed to reduce VOM emissions from stationary sources located in the Chicago ozone non-attainment area in order to contribute to reasonable further progress toward attainment (35 IAC Part 205). If applicable, this program is further described in Section 6.0 of the draft permit, including the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS.
2. The fugitive PM operating program is required to significantly reduce fugitive particulate matter emissions from certain affected locations and facilities (35 IAC Part 212.309 – 212.312). Normally, elements of this program include, but are not limited to, addressing normal traffic pattern roads, parking facilities, and material piles and handling through the use of water, oils, or chemical dust suppressants.

ATTACHMENT 2: Summary of Requirements for Specific Emission Units

The following tables include information on the requirements that apply to significant emission units at this source. The requirements are found in Section 7 of the draft permit, which is further divided into subsection, i.e., Section 7.1, 7.2, etc., for the different categories of units at the source. A separate table is provided for each subsection in Section 7 of the draft permit. An explanation of acronyms and abbreviations is contained in Section 2 of the draft permit.

Table 1 (Section 7.1 of the draft permit)

Emission Unit	
Name	Adhesive/Sealant Coating Line
Description	A coating line applying an adhesive/sealant to welds for protective purposes.
Date Constructed	02/26/03
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.123: Condition 7.1.3(b) Rule 212.123 is an opacity standard that is applicable to all emission units other than fuel combustion emission units (i.e., furnace, boiler, or similar equipment used for the primary purpose of producing heat or power by indirect heat transfer pursuant to 35 IAC 211.2470). • 35 IAC 212.321: Condition 7.1.3(c) Rule 212.321 is a particulate matter (PM) standard that is applicable to all new (i.e., on or after April 14, 1972), process emission units (i.e., any stationary emission units other than fuel combustion emission units (e.g., boilers) or incinerators pursuant to 35 IAC 211.5190). • 35 IAC 212.324: Condition 7.1.3(d) Rule 212.324 is a particulate matter (PM) standard that is applicable to all process emission units located in the vicinity of either McCook or Lake Calumet in Cook County, or Granite City in Madison County. This source is located in the vicinity of Lake Calumet. For this source, rule 212.324 additionally applies a particulate matter less than 10 micron (PM₁₀) standard in addition to the PM standard of rule 212.321.

Emission Unit	
Emission Standards (Continued)	<ul style="list-style-type: none"> • 35 IAC 218.204(j)(4): Condition 7.1.3(e) <p>Rule 218.204 is a volatile organic material (VOM) standard for various applied coatings in the Chicagoland area that limits the maximum VOM content per gallon of coating. In this case, the coating is considered to be an “other” miscellaneous metal parts and products coating. Rule 218.204 is an option of the overall coating requirements of 35 IAC 218 Subpart F that allows three options for compliance: complaint coatings, meeting a daily-weighted average limitation, or complying with an alternative emission limitation (i.e., the use of a capture system and control device). This emission unit does not operate a capture system or control device and the source opted to use the compliant material option over the daily-weighted average limitation.</p> <ul style="list-style-type: none"> • 40 CFR 63.3890(b)(1)(i): Condition 7.1.3(f) <p>40 CFR 63.3890 is an applicable hazardous air pollutants (HAP) limit found in the National Emission Standards for Hazardous Air Pollutants (NESHAP) MMMM for Surface Coating of Miscellaneous Metal Parts and Products. This source is subject to NESHAP MMMM due to the single source relationship with the Ford Motor Company, as previously explained in (c)(3) of the General Source Description, and as such was determined to be an extension of the existing source and therefore an existing (i.e., commenced construction prior to August 13, 2002 pursuant to 40 CFR 63.3882(c) and 40 CFR 63.3882(e)) affected source (i.e., a source that uses 250 gallons per year or more of coatings that contain hazardous air pollutants (HAP)). NESHAP MMMM allows for three options for compliance: compliant material option, emission rate without add-on controls option, or emission rate with add-on controls option. This emission unit does not operate a capture system or control device and opted to use the compliant material option over the emission rate with add-on controls option.</p>
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Conditions 7.1.5 and 7.1.6. These limits were incorporated from Permit 03010072.

Emission Unit	
Non-applicability	<ul style="list-style-type: none"> • 40 CFR Part 60, Subpart MM New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Surface Coating Operations: Non-applicable because the affected coating line does not apply in an automobile or light-duty truck assembly plant: prime coat, guide coat, or topcoat. • 40 CFR Part 63, Subpart IIII Surface Coating of Automobiles and Light-Duty Trucks: Non-applicable because the affected coating line is not located at a facility which applies topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks. • 35 IAC 218 Subpart G: Non-applicable because the affected coating line is not subject to 35 IAC 218 Subpart G (Section 218.301 or 218.302), because the affected coating line is subject to the limitations of 35 IAC 218.204(j) [35 IAC 218.209]. • 40 CFR Part 64, Compliance Assurance Monitoring (CAM): The affected coating line does not use an add-on control device to achieve compliance with an emission limitation or standard.
Periodic Monitoring	
Testing	There are both State and Federal testing requirements. The State testing requirement requires that each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 pursuant to 35 IAC 218.211. The Federal requirements are quite detailed and are found in entirety within the Title V permit, Condition 7.7.1-2. In brief, those requirements require an initial compliance demonstration according to specified methodologies, information from the supplier or manufacturer of the material, information on the solvent blends, and various other calculations necessary to determine the HAP contents of the coatings.
Emissions Monitoring	N/A
Operational Monitoring	N/A
Inspections	Periodic (i.e., quarterly) equipment inspections for good air pollution operating practices and repair within 15 days.

Emission Unit	
Recordkeeping	Coating data (e.g., name, VOM and HAP content, throughputs, MSDS, etc.) to ensure compliance with applicable limits. Record of inspections, routine maintenance, and repair of defects to ensure good air pollution operating practices.
Other	N/A
Reporting	
Prompt Reporting	See Attachment 3.
Other Reporting	Coating usages and emission rates, monthly and annually.
Other Information	
Footnotes	N/A

Table 2 (Section 7.2 of the draft permit)

Emission Unit	
Name	Welding Operation
Description	Assembly operation involving the assembly and welding of stamped components.
Date Constructed	02/26/03
Emission Control Equipment	Four Torit Downflo Dust Collectors
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.123: Condition 7.2.3(b) Rule 212.123 is an opacity standard that is applicable to all emission units other than fuel combustion emission units (i.e., furnace, boiler, or similar equipment used for the primary purpose of producing heat or power by indirect heat transfer pursuant to 35 IAC 211.2470). • 35 IAC 212.321: Condition 7.2.3(c) Rule 212.321 is a particulate matter (PM) standard that is applicable to all new (i.e., on or after April 14, 1972), process emission units (i.e., any stationary emission units other than fuel combustion emission units (e.g., boilers) or incinerators pursuant to 35 IAC 211.5190). <ul style="list-style-type: none"> ○ Pursuant to 35 IAC 266.175, the process weight rate for arc welding is calculated by using the weight of the welding rod and flux consumed. • 35 IAC 212.324: Condition 7.2.3(d) Rule 212.324 is a particulate matter (PM) standard that is applicable to all process emission units located in the vicinity of either McCook or Lake Calumet in Cook County, or Granite City in Madison County. This source is located in the vicinity of Lake Calumet. For this source, rule 212.324 additionally applies a particulate matter less than 10 micron (PM₁₀) standard in addition to the PM standard of rule 212.321.
Streamlining	N/A
Title I Conditions	N/A

Emission Unit	
Non-applicability	<ul style="list-style-type: none"> 40 CFR Part 64, Compliance Assurance Monitoring (CAM): The affected welding operation does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	N/A
Emissions Monitoring	N/A
Operational Monitoring	N/A
Inspections	Periodic (i.e., quarterly) equipment inspections for good air pollution operating practices and repair within 15 days.
Recordkeeping	<p>Type(s) of welding rod utilized.</p> <p>Weight of the welding rod and flux consumed by type, (ton/month and ton/year).</p> <p>Records of the maintenance and operation of the dust filter system including the replacement of filters.</p> <p>Welding operation emissions with supporting calculations based from the record keeping as required by this condition.</p>
Other	The welding operation dust filter control system shall be in operation at all times when the affected welding operations are in operation and emitting air contaminants.
Reporting	
Prompt Reporting	See attachment 3.
Other Reporting	Welding operation emissions with supporting calculations based from the record keeping as required by this condition.
Other Information	
Footnotes	N/A

ATTACHMENT 3: Prompt Reporting of Deviations

Prompt reporting of deviations is critical in order to have timely notice of deviations and the opportunity to respond, if necessary. The effectiveness of the permit depends upon, among other important elements, timely and accurate reporting. The Illinois EPA, USEPA and the public rely on timely and accurate reports submitted by the permittee to measure compliance and to direct investigation and follow-up activities. Prompt reporting is evidence of a permittee's good faith in disclosing deviations and describing the steps taken to return to compliance and prevent similar incidents.

Any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in this CAAPP permit is a deviation subject to prompt reporting. Additionally, any failure to comply with any permit term or condition is a deviation of that permit term or condition and must be reported to the Illinois EPA as a permit deviation. The deviation may or may not be a violation of an emission limitation or standard. A permit deviation can exist even though other indicators of compliance suggest that no emissions violation or exceedance has occurred. Reporting permit deviations does not necessarily result in enforcement action. The Illinois EPA has the discretion to take enforcement action for permit deviations that may or may not constitute an emission limitation or standard or the like, as necessary and appropriate.

Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(B), requires prompt reporting of deviations from the permit requirements. The permitting authority (in this case, Illinois EPA) has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur. Furthermore, Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(A) requires that monitoring reports must be submitted at least every 6 months. Therefore, USEPA generally considers anything less than 6 months to be "prompt" as long as the selected time frame is justified appropriately (60 Fed. Reg. 36083, 36086 (July 13, 1995)).

The USEPA has stated that, for purposes of administrative efficiency and clarity, it is acceptable to define prompt in each individual permit. *Id.* The Illinois EPA has elected to follow this approach and defines prompt reporting on a permit by permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, this frequency or a shorter frequency of reporting is the required timeframe used in this permit. Where the underlying applicable requirement fails to explicitly set forth the timeframe for reporting deviations, the Illinois EPA has developed a structured manner to determine the reporting approach used in this permit.

The Illinois EPA generally uses a time frame of 30 days to define prompt reporting of most deviations. Also, for certain permit conditions in individual permits, the Illinois EPA may require an alternate timeframe that is less than 30 days if the permit requirement justifies a shorter reporting time period. Under certain circumstances, EPA may establish a deviation reporting period longer than 30 days, but, in no event exceeding 6 months. Where it has established a deviation reporting period other than 30 days in an individual permit (specifically

Section 7.x.10), the Illinois EPA has explained the reason for the alternative timeframe. (See Attachment 2 of this Project Summary.)

The timing for certain deviation reporting may be different when a source or emission unit at a source warrants reporting to address operation, independent of the occurrence of any deviations. This is the case for a source that is required to perform continuous monitoring for the emission unit, for which quarterly or semi-annual “monitoring” reports are appropriate. Where appropriate, reporting of deviations has generally been combined in, or coordinated with these quarterly or semi-annual reports, so that the overall performance of the plant can be reviewed in a comprehensive fashion. This will allow a more effective and efficient review of the overall performance of the source by the Illinois EPA and other interested parties, as well as by the source itself.

At the same time, there are certain deviations for which quicker reporting is appropriate. These are deviations for which individual attention or concern may be warranted by the Illinois EPA, USEPA, and other interested parties. Under this scenario, emphasis has been placed primarily on deviations that could represent substantial violations of applicable emission standards or lapses in control measures at the source. For these purposes, depending on the deviation, immediate notification may be required and preceded by a follow-up report submitted within 15 days, during which time the source may further assess the deviation and prepare its detailed plan of corrective action.

In determining the timeframe for prompt reporting, the Illinois EPA assesses a variety of criteria such as:

- historical ability to remain in continued compliance,
- level of public interest in a specific pollutant and/or source,
- seriousness of the deviation and potential to cause harm,
- importance of applicable requirement to achieving environmental goals,
- designation of the area (i.e., non-attainment or attainment),
- consistency among industry type and category,
- frequency of required continuous monitoring reports (i.e., quarterly),
- type of monitoring (inspection, emissions, operational, etc.), and
- air pollution control device type and operation

These prompt reporting decisions reflect the Illinois EPA’s consideration of the possible nature of deviations by different emission units and the responses that might be required or taken for those different types of deviations. As a consequence, the conditions for different emission units may identify types of deviations which include but are not limited to: 1) Immediate (or very quick) notification; 2) Notification within 30 days as the standard; or 3) Notification with regular quarterly or semi-annual monitoring reports.

The Illinois EPA’s decision to use the above stated prompt reporting approach for deviations as it pertains to establishing a shorter timeframe in certain circumstances reflects the criteria discussed as well as USEPA guidance on the topic.

- 40 CFR 71.6(a)(3)(iii)(B) specifies that certain potentially serious deviations must be reported within 24 or 48 hours, but provides for semi-annual reporting of other deviations. (Serious or severe consequences)
- FR Vol. 60, No. 134, July 13, 1995, pg. 36086 states that prompt should generally be defined as requiring reporting within two to ten days of the deviation, but longer time periods may be acceptable for a source with a low level of excess emissions. (intermediate consequences)
- Policy Statement typically referred to as the “Audit Policy” published by the USEPA defines prompt disclosure to be within 21 days of discovery. (Standard for most “pollutant limiting” related conditions)
- Responses to various States by USEPA regarding other States’ definition of prompt.

As a result, the Illinois EPA’s approach to prompt reporting for deviations as discussed herein is consistent with the requirements of 39.5(7)(f)(ii) of the Act as well as 40 CFR part 70 and the CAA. This reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant individual attention. The timing for these event-specific notifications is necessary and appropriate as it gives the source enough time to conduct a thorough investigation into the causes of an event, collecting any necessary data, and to develop preventative measures, to reduce the likelihood of similar events, all of which must be addressed in the notification for the deviation.

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