

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Apollo Plastics  
Attn: Larry Polleck  
5333 North Elston Avenue  
Chicago, Illinois 60630

<u>Application No.:</u> 06090078	<u>I.D. No.:</u> 031600FMK
<u>Applicant's Designation:</u>	<u>Date Received:</u> September 29, 2006
<u>Subject:</u> Coating of molded plastic parts for interior automotive use.	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 5333 North Elston Avenue, Chicago, Cook County, 60630	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

Three (3) Coating lines (Large C.O.E. Line (Line #1), Small C.O.E. Line (Line #2), and Robotic Line (Line #3)) and Recip Booth controlled by a Regenerative Thermal Oxidizer (RTO);  
Twelve (12) Pad Printers (PP-1 - PP-12);  
Twenty-six (26) Injection Molding Machines (IM-1 - IM-26); and  
a Parts Washer

pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
  - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP.

- iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property 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 required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- e. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.

- f. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- g. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- h. Pursuant to 35 Ill. Adm. Code 212.321(a), 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 35 Ill. Adm. Code 212.321(c).
- 3. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 218.182(a), no person shall operate a cold cleaning degreaser unless:

- i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
  - ii. The cover of the degreaser is closed when parts are not being handled; and
  - iii. Parts are drained until dripping ceases.
- b. Pursuant to 35 Ill. Adm. Code 218.182(b), no person shall operate a cold cleaning degreaser unless:
- i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powered system if:
    - A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);
    - B. The solvent is agitated; or
    - C. The solvent is heated above ambient room temperature.
  - ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
    - A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
    - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
  - iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point:
    - A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
    - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA and further processed consistent with 35 Ill. Adm. Code 218.108. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
  - iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and

- v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
- c. Pursuant to 35 Ill. Adm. Code 218.182(c)(3)(B), on and after May 30, 2007 no person shall operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F), unless the person is in compliance with the control requirements of 35 Ill. Adm. Code 218.182(c)(4) or is exempt under 35 Ill. Adm. Code 218.182(f) or (g).
- d. Pursuant to 35 Ill. Adm. Code 218.204(n), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Plastic Parts Coating: Automotive/Transportation coating. The following emission limitations are 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, except where noted. 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 composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. (Note: The equation presented in 35 Ill. Adm. Code 218.206 shall be used to calculate emission limitations for determining compliance by add on controls, credits for transfer efficiency, emissions trades and cross line averaging.) The emission limitations are as follows:

i.	Interiors	<u>kg/l</u>	<u>lb/gal</u>
	A. Baked		
	I. Color coat	0.49	(4.1)
	II. Primer	0.46	(3.8)
	B, Air Dried		
	I. Color coat	0.38	(3.2)
	II. Primer	0.42	(3.5)
ii.	Exteriors (flexible and non-flexible)	<u>kg/l</u>	<u>lb/gal</u>
	A. Baked		
	I. Primer	0.60	(5.0)

	II.	Primer non-flexible	0.54	(4.5)
	III.	Clear coat	0.52	(4.3)
			<u>kg/l</u>	<u>lb/gal</u>
	V.	Color coat	0.55	(4.6)
B.	Air Dried			
	I.	Primer	0.66	(5.5)
	II.	Clear coat	0.54	(4.5)
	III.	Color coat (red & black)	0.67	(5.6)
	IV.	Color coat (others)	0.61	(5.1)
iii.	Specialty			
	A.	Vacuum metallizing basecoats, texture basecoats	0.66	(5.5)
	B.	Black coatings, reflective argent coatings, air bag cover coatings, and soft coatings	0.71	(5.9)
	C.	Gloss reducers, vacuum metallizing topcoats, and texture topcoats	0.77	(6.4)
	D.	Stencil coatings, adhesion primers, ink pad coatings, electrostatic prep coatings, and resist coatings	0.82	(6.8)
	E.	Head lamp lens coatings	0.89	(7.4)
e.	Pursuant to 35 Ill. Adm. Code 218.207(a), any owner or operator of a coating line subject to 35 Ill. Adm. Code 218.204 may comply with 35 Ill. Adm. Code 218.207, rather than with 35 Ill. Adm. Code 218.204, if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), or (k) of (depending upon the source category) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in 35 Ill. Adm. Code 218.105 and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(e); and the control device is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d) and the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times			

the control device is in use. A capture system and control device, which does not demonstrate compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), or (k) may be used as an alternative to compliance with 35 Ill. Adm. Code 218.204 only if the alternative is approved by the Illinois EPA and approved by the USEPA as a SIP revision.

- f. i Pursuant to 35 Ill. Adm. Code 218.207(b)(1), the coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency, or
  - ii. Pursuant to 35 Ill. Adm. Code 218.207(b)(2), the system used to control VOM from the coating line is demonstrated to have an overall efficiency sufficient to limit VOM emissions to no more than what is allowed under 35 Ill. Adm. Code 218.204.
- g. Pursuant to 35 Ill. Adm. Code 218.207(i), no owner or operator of a plastic parts coating line which applies one or more coatings during the same day, all of which are subject to the same numerical emission limitation within 35 Ill. Adm. Code 218.204(n) or (o) (e.g., all coatings used on the line are subject to 0.42 kg/l [3.5 lbs/gal]), and which is equipped with a capture system and control device shall operate the subject coating line unless the requirements in 35 Ill. Adm. Code 218.207(b)(1) or (b)(2) are met.
- h. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.
- 5. This permit is issued based on the coating operations at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- 6. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302).
- 7a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

- b. The regenerative thermal oxidizer shall be in operation at all times when the associated coating lines are in operation and emitting air contaminants.
  - c. The regenerative thermal oxidizer combustion chamber shall be preheated to the temperature at which compliance was demonstrated during the most recent performance test or to at least the manufacturer's recommended temperature of 1,400°F in the absence of a compliance test. This temperature shall be maintained during active coating operation of the associated coating lines.
  - d. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the regenerative thermal oxidizer such that the regenerative thermal oxidizer is kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- 8a. Emissions and operation of the coating processes (coating line #1, Line #2, Line #3, and Recip Booth) shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
	<u>(gal/mo)</u>	<u>(gal/yr)</u>	<u>Content</u> <u>(lb/gal)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>
Coating	6,110	61,175	6.06	2,555	12.79
Cleanup Solvent	330	3,300	6.87	157	0.78
			Total:		13.57

These limits are based on maximum coating and solvent usage, the VOM content of coatings and solvents, and overall control efficiency of 93.1%.

- b. VOM emissions from the coating lines shall be calculated using the following equation:

$$E = [\sum P_i \times d_i \times C_i \times (1 - CE)] / 2,000$$

Where:

E = VOM emissions (tons);

P<sub>i</sub> = coating and solvent usage (gal);

d<sub>i</sub> = density of coating or solvent (lb/gal);

C<sub>i</sub> = VOM content of coating and solvent used (% by weight); and

CE = overall control efficiency (fraction)\*;

\*Stack tested overall control efficiency of 93.1%, (98% destruction efficiency and capture efficiency 95%).

The above limitations were established in permit 06090077 pursuant to

Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in the above-referenced construction permit that limit the VOM emissions from the coating lines below the levels that would trigger the applicability of these rules, consistent with the information provided in the above-referenced construction permit application.

- c. Emissions and operation of the pad printing shall not exceed the following limits:

<u>Material</u>	Material Usage		VOM	VOM Emissions	
	<u>(gal/mo)</u>	<u>(gal/yr)</u>	<u>Content (lb/gal)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>
Ink coating with thinner	15	150	5.3	80	0.40

These limits are based on maximum coating with thinner usage, and the VOM content of the ink coating and thinner.

- d. Emission and operation of injection molding shall not exceed the following limits:

- i. Usage and resin and mold cleaner and VOM emissions:

<u>Material</u>	Material Usage		VOM Emission	VOM Emissions	
	<u>(lbs/mo)</u>	<u>(tons/yr)</u>	<u>Factor (%)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>
Plastic resin	200,000	1,000.0	0.027	54	0.27
Mold cleaner	400	2.0	100.000	400	<u>2.00</u>
Total:					<u>2.27</u>

These limits are based on maximum plastic resin and mold cleaner usage, a maximum VOM content of 0.027% for resin (Polycarbonate/ABS resin) and a maximum VOM content of 100% for mold cleaner.

- ii. This permit is issued based on negligible emissions of particulate matter (PM) from the injection molding machines. For this purpose, emissions from each unit shall not exceed nominal emission rates of 0.01 lb/hr and 0.044 ton/year (0.26 lb/hr, 1.14 ton/yr of total PM).

- e. Emission and operation of parts washer shall not exceed the following limits:

<u>Material</u>	Material Usage		VOM	VOM Emissions	
	<u>(gal/mo)</u>	<u>(gal/yr)</u>	<u>Content (lb/gal)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>

Solvent cleaner                      50                      150                      6.6                      330                      0.50

These limits are based on net solvent cleaner usage (virgin solvent minus waste solvent hauled off site) and average VOM content of solvent.

- f. Emission and operation of all natural gas combustion units shall not exceed the following limits:

Natural Gas Usage		Pollutant	Emission	VOM Emissions	
(mmscf/mo)	(mmscf/yr)		Factor (lb/mmscf)	(lb/mo)	(ton/yr)
5	51.2	CO	84.0	420	2.15
		NO <sub>x</sub>	100.0	500	2.56
		PM	7.6	38	0.19
		SO <sub>2</sub>	0.6	3	0.02
		VOM	5.5	28	0.14

These limits are based on the maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

9. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA and the NESHAP for Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP.
10. Compliance with the annual limits of this permit 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).
- 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective

until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
  - b. Testing required by Conditions 12 and 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
12. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
  13. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 of this Part to establish the records required under 35 Ill. Adm. Code 218.211.
  - 14a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
    - b. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of  $\pm 1$  percent of the temperature measured in degrees Celsius or  $\pm 0.5^{\circ}$  C, whichever is greater.
  15. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit,

without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

16. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 17a. Pursuant to 35 Ill. Adm. Code 218.182(d)(2), on and after March 15, 1999 all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c)(1)(B), (c)(2)(B), and (c)(3)(B) must maintain records which include for each purchase:
  - i. The name and address of the solvent supplier;
  - ii. The date of purchase;
  - iii. The type of solvent;
  - iv. The vapor pressure of the solvent measured in mmHg at 20° C (68° F); and
  - v. For any mixture of solvents, the vapor pressure of the mixture, as used, measured in mmHg at 20° C (68° F).
- b. Pursuant to 35 Ill. Adm. Code 218.182(e), all records required by 35 Ill. Adm. Code 218.182(d) shall be retained for three years and shall

be made available to the Illinois EPA upon request.

- c. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(2) or (a)(3) and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record all of the following information for each coating line and maintain the information at the source for a period of three years:
  - i. The name and identification number of each coating as applied on each coating line.
  - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
- d. Pursuant to 35 Ill. Adm. Code 218.211(e)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g) or (h) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
  - i. The weight of VOM per volume of coating solids as applied each day on each coating line, if complying pursuant to 35 Ill. Adm. Code 218.207(b)(2).
  - ii. Control device monitoring data.
  - iii. A log of the operating time for the capture system, control device, monitoring equipment and the associated coating line.
  - iv. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Records addressing use of good operating practices for the regenerative thermal oxidizer:
    - A. Records for periodic inspection of the regenerative thermal oxidizer with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
  - ii. Names and amounts of coatings and solvents used (gal/month, gal year) separately for controlled and uncontrolled operations;

- iii. Density of coatings and clean-up solvents (lbs/gallon);
  - iv. VOM and HAP content of coatings and clean-up solvents (% by weight);
  - v. Plastic resin and mold cleaner usage (lbs/month, tons/year);
  - vi. Plastic resin and mold cleaner VOM and HAP content (% by weigh);
  - vii. Natural gas usage (mmscf/month, mmscf/year); and
  - viii. Monthly and annual VOM, PM, CO, NO<sub>x</sub>, SO<sub>2</sub>, and HAP emissions from the source with supporting calculations (tons/month, tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
18. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 19a. Pursuant to 35 Ill. Adm. Code 218.182(d)(6), on and after March 15, 1999, all persons subject to the requirements of 35 Ill. Adm. Code 218.182(b) or (c) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.182(b) or (c) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.
- b. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 of and complying by means of 35 Ill. Adm. Code 218.204 shall notify the Illinois EPA in the following instances:
- i. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), respectively. Upon changing the method of compliance

from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d) or (e), respectively.

- c. Pursuant to 35 Ill. Adm. Code 218.211(e)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g) or (h) shall notify the Illinois EPA in the following instances:

- i. Any record showing violation of 35 Ill. Adm. Code 218.207 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

- ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(c) or (d), respectively.

20a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or deviation and efforts to reduce emissions and future occurrences.

- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance and Enforcement Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

If you have any questions on this permit, please call German Barria at 217/782-2113.

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Edwin C. Bakowski, P. E.  
Manager, Permit Section  
Division of Air Pollution Control

ECB: GB:

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the Molding and Coating of Plastic Interior Automotive Parts Plant, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for any combination of such HAP) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, coatings used and control measures are more effective than in this permit.

<u>Emission Units</u>	EMISSIONS (Tons/year)					Single <u>HAP</u>	Total <u>HAPs</u>
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>		
Coating Lines #1, #2, #3, and Recip Booth					13.57		
Pad Printing					0.40		
Injection Molding			1.14		2.27		
Parts Washer					0.50		
Fuel Combustion	<u>2.15</u>	<u>2.56</u>	<u>0.19</u>	<u>0.02</u>	<u>0.14</u>	--	--
Total	<u>2.15</u>	<u>2.56</u>	<u>1.33</u>	<u>0.02</u>	<u>16.88</u>	9.0	22.5

ECB: GB: