

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

Carstin Brands, Inc.
520 East 2nd Street, Arthur, Douglas County, 61911

Illinois EPA ID Number: 041404AAP

Application Number: 95120103

Application Type: Renewal Permit

Start of Public Comment Period: March 1, 2007

Close of Public Comment Period: March 31, 2007

Permit Engineer/Technical Contact: Jonathan Sperry, 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 a renewal of the 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.

The principal changes from the current version of this CAAPP permit are the addition of lines 3 and 4, constructed in 2004, and the corresponding requirements from Construction Permit 04080029. In addition, the federal standards for Reinforced Plastic Composites Production were added (40 CFR 53, Subpart WWWW) for the new and existing emission units. These rules had a compliance date of April 21, 2006.

II. GENERAL SOURCE DESCRIPTION

a. Nature of source

The source utilizes batch mixing, casting machines, coating lines, and curing ovens to produce cast polymer products. The primary source of pollutants at this source is the coating line. The source uses resins with low monomer contents and a submerged loading pipe on the resin storage tank to reduce to reduce VOM and HAP emissions. The source also uses filters to reduce PM emissions.

b. Ambient air quality status for the area

The source is located in an area that is currently designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria

pollutants (carbon monoxide, lead, nitrogen dioxide, ozone, PM_{2.5}, PM₁₀, sulfur dioxide).

c. Major source status

1. The source requires a CAAPP permit as a major source of 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 the federal rules for production of reinforced plastic composites (40 CFR 63, Subpart WWWW).

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)				
	2001	2002	2003	2004	2005
CO	---	---	---	---	---
NO _x	0.04	0.07	0.07	0.05	0.04
PM	---	---	---	---	---
SO ₂	---	---	---	---	---
VOM	15.85	16.24	19.41	22.34	20.25
Styrene (top HAP)	12.21	12.65	14.96	16.52	15.25

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.

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

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 - Polyester Resin Storage Tank	
Description	Fixed roof storage tank, stores various resin products
Date Constructed	October 1992
Emission Control Equipment	Submerged Loading Pipe
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 215.122(b) – requires submerged loading pipe • 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on emissions in Condition 5.6.3(b) that include this tank. These limits were incorporated from Permit 04080029.
Non-applicability	<ul style="list-style-type: none"> • 40 CFR Part 60, Subpart Kb: This storage tank has a capacity of less than 6,000 gallons. Therefore, it is smaller than the applicability level of approximately 10,000 gallons. • 35 IAC 215.121 and 35 IAC 215.122(a): This storage tank has a capacity of less than 6,000 gallons. Therefore, it is smaller than the applicability level of 40,000 gallons. • 40 CFR Part 64: This storage tank uses a passive control measure (submerged loading pipe) and is therefore not subject to the Compliance Assurance Monitoring rules.
Periodic Monitoring (other than basic regulatory requirements)	

Emission Unit - Polyester Resin Storage Tank

Recordkeeping

The Permittee is required to keep records regarding the presence, maintenance, and repair of the submerged loading pipe which is used to minimize VOM emissions during tank filling. This is adequate for periodic monitoring purposes due to the low amount of emissions (< 1 ton/year) and a lack of historical, emissions-related compliance problems.

Reporting

Prompt Reporting

The Permittee shall report deviations with respect to the submerged loading pipe as follows (see Attachment 3):

- within 5 days due to absence of control features, and
- within 30 days for all other situations.

Table 2 (Section 7.2 of the draft permit)

Emission Unit - Continuous Casting Machine - Line 1	
Description	Three batch mixing stations and a continuous casting machine
Date Constructed	May 1990 and 1994
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212, Subpart L – PM emission limits • 35 IAC 215.301 – VOM emission limit • 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Conditions 5.5.1 and 5.6.3 that include these emission units. These limits were incorporated from Permits 95120045 and 04080029.
Non-applicability	<ul style="list-style-type: none"> • 40 CFR Part 64: The Compliance Assurance Monitoring rules are not applicable because there is no add-on control device to achieve compliance with an emission limitation or standard.
Periodic Monitoring (other than basic regulatory requirements)	
Recordkeeping	The Permittee is required to keep records of the VOM and HAP contents and usage rates of materials. This, along with NESHAP requirements, is adequate for periodic monitoring purposes due to the lack of historical, emissions-related compliance problems.
Reporting	
Prompt Reporting	<p>In addition to NESHAP requirements, the Permittee shall report deviations as follows (see Attachment 3):</p> <ul style="list-style-type: none"> • within 30 days due to deviations from emission limits, and • quarterly for all other situations.

Table 3 (Section 7.3 of the draft permit)

Emission Unit - Gel Coat Spray Booth and Curing Oven - Line 1	
Description	A gel coat spray booth and curing oven for coating fiberglass molds with a gel
Date Constructed	May 1990
Emission Control Equipment	Filter
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212, Subpart L – PM emission limits • 35 IAC 215.301 – VOM emission limit • 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Conditions 5.5.1 and 5.6.3 that include these emission units. These limits were incorporated from Permits 95120045 and 04080029.
Non-applicability	<ul style="list-style-type: none"> • 35 IAC 215.204: The limits for coating VOM content do not apply because the substrate used in this process is not regulated. • 40 CFR Part 64: The Compliance Assurance Monitoring rules are not applicable because the control devices are not used to achieve compliance with a standard. The filter controls PM emissions, and are not required to ensure compliance with the limits in 35 IAC 212.321.
Periodic Monitoring (other than basic regulatory requirements)	
Operational Monitoring	The Permittee is required to operate, maintain, and replace the filters and maintain an adequate inventory of spare filters.
Inspections	The Permittee is also required to visually inspect the filters and check for air flow drop on a regular basis.
Recordkeeping	The Permittee is required to keep records of the VOM and HAP contents and usage rates of materials. The Permittee is also required to keep results of filter inspections, including data on replacements.
	The above items, along with NESHAP requirements, are adequate for periodic monitoring purposes due to the lack of historical, emissions-related compliance problems.

Emission Unit - Gel Coat Spray Booth and Curing Oven - Line 1	
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Reporting	
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Prompt Reporting	In addition to NESHAP requirements, the Permittee shall report deviations as follows (see Attachment 3): <ul style="list-style-type: none">• within 30 days due to deviations from emission limits, and• quarterly for all other situations.
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Table 4 (Section 7.4 of the draft permit)

Emission Unit - Solid Surface Casting Vacuum Pot Mixer - Line 2	
Description	A solid surface casting pot mixer for mixing resin with a solid surface matrix
Date Constructed	August 1994
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212, Subpart L – PM emission limits • 35 IAC 215.301 – VOM emission limit • 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Conditions 5.5.1 and 5.6.3 that include these emission units. These limits were incorporated from Permits 95120045 and 04080029.
Non-applicability	<ul style="list-style-type: none"> • 40 CFR Part 64: The Compliance Assurance Monitoring rules are not applicable because there is no add-on control device to achieve compliance with an emission limitation or standard.
Periodic Monitoring (other than basic regulatory requirements)	
Recordkeeping	The Permittee is required to keep records of the VOM and HAP contents and usage rates of materials. This, along with NESHAP requirements, is adequate for periodic monitoring purposes due to the lack of historical, emissions-related compliance problems.
Reporting	
Prompt Reporting	<p>In addition to NESHAP requirements, the Permittee shall report deviations as follows (see Attachment 3):</p> <ul style="list-style-type: none"> • within 30 days due to deviations from emission limits, and • quarterly for all other situations.

Table 5 (Section 7.5 of the draft permit)

Emission Unit - Curing Oven - Line 2	
Description	A natural gas fired oven that cures cast matrix marble parts
Date Constructed	August 1994
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212, Subpart L – PM emission limits • 35 IAC 215.301 – VOM emission limit
Non-applicability	<ul style="list-style-type: none"> • 40 CFR Part 64: The Compliance Assurance Monitoring rules are not applicable because there is no add-on control device to achieve compliance with an emission limitation or standard.
Periodic Monitoring (other than basic regulatory requirements)	
Recordkeeping	The Permittee is required to keep records of natural gas usage in the curing oven. This is adequate for periodic monitoring purposes since compliance with applicable rules is inherent due to operation with natural gas.
Reporting	
Prompt Reporting	The Permittee shall report on excess emissions within 30 days of such occurrence (see Attachment 3).

Table 6 (Section 7.6 of the draft permit)

Emission Unit - Marble Casting Process - Lines #3 and #4	
Description	Continuous and batch casting machines for the mixing of resin materials and casting of the mixed resin into molds
Date Constructed	2004
Emission Control Equipment	Low monomer content resin
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212, Subpart L – PM emission limits • 35 IAC 215.301 – VOM emission limit • 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Condition 7.6.6. These limits were incorporated from Permit 04080029.
Non-applicability	<ul style="list-style-type: none"> • 40 CFR 52.21: The federal rules for Prevention of Significant Deterioration are not applicable because the potential emissions of all new equipment constructed in 2004 was 53 tons/year, as indicated by the federally enforceable limitations and Attachment 7 of the draft permit. This is much less than the applicability threshold of 250 tons/year. • 40 CFR Part 64: The marble casting process uses a passive control measure (low-polluting feedstock) and is therefore not subject to the Compliance Assurance Monitoring rules.
Periodic Monitoring (other than basic regulatory requirements)	
Recordkeeping	The Permittee is required to keep records of the VOM and HAP contents and usage rates of materials. The Permittee is also required to keep results of filter inspections, including data on replacements. This, along with NESHAP requirements, is adequate for periodic monitoring purposes due to the lack of historical, emissions-related compliance problems.
Reporting	
Prompt Reporting	<p>In addition to NESHAP requirements, the Permittee shall report deviations as follows (see Attachment 3):</p> <ul style="list-style-type: none"> • within 30 days due to deviations from emission or operational limits, and • quarterly for all other situations.

Table 7 (Section 7.7 of the draft permit)

Emission Unit - Gel Coat and Curing Process – Lines #3 and #4	
Description	Gel coat spray booths and electric curing ovens to prepare molds for casting
Date Constructed	2004
Emission Control Equipment	Filter
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212, Subpart L – PM emission limits • 35 IAC 215.301 – VOM emission limit • 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Condition 7.7.6. These limits were incorporated from Permit 04080029.
Non-applicability	<ul style="list-style-type: none"> • 35 IAC 215.204: The limits for coating VOM content do not apply because the substrate used in this process is not regulated. • 40 CFR 52.21: The federal rules for Prevention of Significant Deterioration are not applicable because the potential emissions of all new equipment constructed in 2004 was 53 tons/year, as indicated by the federally enforceable limitations and Attachment 7 of the draft permit. This is much less than the applicability threshold of 250 tons/year. • 40 CFR Part 64: The Compliance Assurance Monitoring rules are not applicable because the control devices are not used to achieve compliance with a standard. The filter controls PM emissions, and are not required to ensure compliance with the limits in 35 IAC 212.321.
Periodic Monitoring (other than basic regulatory requirements)	
Operational Monitoring	The Permittee is required to operate, maintain, and replace the filters and maintain an adequate inventory of spare filters.
Inspections	The Permittee is also required to visually inspect the filters and check for air flow drop on a regular basis.
Recordkeeping	The Permittee is required to keep records of the VOM and HAP contents and usage rates of materials. The Permittee is also required to keep results of filter inspections, including data on replacements.
	The above items, along with NESHAP requirements, are adequate for periodic monitoring purposes due to the lack of historical, emissions-related compliance problems.

Emission Unit - Gel Coat and Curing Process – Lines #3 and #4	
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Reporting	
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Prompt Reporting	In addition to NESHAP requirements, the Permittee shall report deviations as follows (see Attachment 3): <ul style="list-style-type: none">• within 30 days due to deviations from emission limits, and• quarterly for all other situations.
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Table 8 (Section 7.8 of the draft permit)

Emission Unit - Miscellaneous Operations – All Lines	
Description	Ancillary process that use VOM containing materials, including mold waxes and mold release agents, mold sealers and cleaners, organic peroxide catalysts and miscellaneous cleaning solvents
Date Constructed	Same as the construction date for each line
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212, Subpart L – PM emission limits • 35 IAC 215.301 – VOM emission limit • 40 CFR 63, Subpart WWWW – NESHAP for Reinforced Plastic Composites Production
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Conditions 7.8.5 and 7.8.6. These limits were incorporated from Permit 04080029.
Non-applicability	<ul style="list-style-type: none"> • 40 CFR 52.21: The federal rules for Prevention of Significant Deterioration are not applicable because the potential emissions of all new equipment constructed in 2004 was 53 tons/year, as indicated by the federally enforceable limitations and Attachment 7 of the draft permit. This is much less than the applicability threshold of 250 tons/year. • 40 CFR Part 64: The Compliance Assurance Monitoring rules are not applicable because there is no add-on control device to achieve compliance with an emission limitation or standard.
Periodic Monitoring (other than basic regulatory requirements)	
Recordkeeping	The Permittee is required to keep records of the VOM and HAP contents and usage rates of materials. This, along with NESHAP requirements, is adequate for periodic monitoring purposes due to the lack of historical, emissions-related compliance problems.
Reporting	
Prompt Reporting	<p>The Permittee shall report deviations as follows (see Attachment 3):</p> <ul style="list-style-type: none"> • within 30 days due to deviations from emission limits, and • quarterly for all other situations.

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, emissions-related 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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