

217/785-1705

RENEWAL  
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

XPAC

Attn: Kathryn Nigey, Director of Quality and Safety  
Post Office Box 733  
Moline, Illinois 61266

I.D. No.: 161040ABE  
Application No.: 95120076

Date Received: January 30, 2008  
Date Issued: February 27, 2012  
Expiration Date<sup>1</sup>: February 27, 2017

Operation of: Export Packaging Company, Inc. DBA XPAC, Industrial painting  
of construction and agriculture parts  
Source Location: 827 West 9th Street, Milan, Rock Island, 61264  
Responsible Official: Kathryn Nigey, Director of Quality and Safety

This permit is hereby granted to the above-designated Permittee to OPERATE a  
Painting and packaging of manufactured goods, pursuant to the above  
referenced permit application. This permit is subject to the conditions  
contained herein.

If you have any questions concerning this permit, please contact Ross Cooper  
at 217/785-1705.

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

ECB:RWC:psj

cc: Illinois EPA, FOS, Region 2  
CES  
Lotus Notes

1 Except as provided in Conditions 1.5 and 8.7 of this permit.

TABLE OF CONTENTS

	<u>Page</u>
<b>1.0 INTRODUCTION</b>	4
1.1 Source Identification	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 Source Description	
1.5 Title I Conditions	
<b>2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED</b>	5
<b>3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES</b>	6
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
<b>4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE</b>	9
<b>5.0 OVERALL SOURCE CONDITIONS</b>	10
5.1 Applicability of Clean Air Act Permit Program (CAAPP)	
5.2 Area Designation	
5.3 Source-Wide Applicable Provisions and Regulations	
5.4 Source-Wide Non-Applicability of Regulations of Concern	
5.5 Source-Wide Control Requirements and Work Practices	
5.6 Source-Wide Production and Emission Limitations	
5.7 Source-Wide Testing Requirements	
5.8 Source-Wide Monitoring Requirements	
5.9 Source-Wide Recordkeeping Requirements	
5.10 Source-Wide Reporting Requirements	
5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios	
5.12 Source-Wide Compliance Procedures	
<b>6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS</b>	17
<b>7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS</b>	18
7.1 Painting Systems	
7.2 Cold Cleaning Operations	
<b>8.0 GENERAL PERMIT CONDITIONS</b>	44
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	

8.5	Testing Procedures	
8.6	Reporting Requirements	
8.7	Title I Conditions	
<b>9.0</b>	<b>STANDARD PERMIT CONDITIONS</b>	49
9.1	Effect of Permit	
9.2	General Obligations of Permittee	
9.3	Obligation to Allow Illinois EPA Surveillance	
9.4	Obligation to Comply with Other Requirements	
9.5	Liability	
9.6	Recordkeeping	
9.7	Annual Emissions Report	
9.8	Requirements for Compliance Certification	
9.9	Certification	
9.10	Defense to Enforcement Actions	
9.11	Permanent Shutdown	
9.12	Reopening and Reissuing Permit for Cause	
9.13	Severability Clause	
9.14	Permit Expiration and Renewal	
9.15	General Authority for the Terms and Conditions of this Permit	
<b>10.0</b>	<b>ATTACHMENTS</b>	
1	Example Certification by a Responsible Official	1-1
2	Emissions of Particulate Matter from Process Emission Units	2-1
3	Compliance Assurance Monitoring (CAM) Plan	3-1
4	Guidance	4-1

1.0 INTRODUCTION

1.1 Source Identification

Export Packaging Company, Inc. DBA XPAC  
827 West 9th Street  
Milan, Illinois 61264  
(309)787-0440

I.D. No.: 161040ABE  
County: Rock Island  
Standard Industrial Classification: 7389, Packaging and Crating

1.2 Owner/Parent Company

XPAC  
Post Office Box 733  
Moline, Illinois 61266

1.3 Operator

XPAC  
Post Office Box 733  
Moline, Illinois 61266

Kathryn Nigey, Director of Quality and Safety  
(309)787-0440

1.4 Source Description

The source paints and packages heavy off-highway vehicle machine parts.

Note: This narrative description is for informational purposes only and is not enforceable.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1".

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

### 3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Paint Drying Oven

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Parts Washer

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

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

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

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents,

fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.
- 3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70°F, the Permittee shall comply with the applicable requirements of 35 IAC 215.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.

### 3.3 Addition of Insignificant Activities

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

35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Automated Paint Booth #1	Used to paint heavy off-highway parts	1978	Dry Filter System
Automated Paint Booth #2	Used to paint heavy off-highway parts	1978	Dry Filter System
Automated Paint Booth #3	Used to paint heavy off-highway parts	1997	Dry Filter System
Automated Paint Booth #4	Used to paint heavy off-highway parts	1997	Dry Filter System
Manual Paint Booth	Used to paint larger metal parts	1978	Dry Filter System
Cold Cleaning Operation #1	Manual solvent cleaning (soaked shop towels)	-	None
Cold Cleaning Operation #2	Cold Cleaning Degreaser	-	None

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Applicability of Clean Air Act Permit Program (CAAPP)

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source requiring a CAAPP permit because the source is subject to a standard, limitation, or other requirement under Section 112 (HAPs) of the CAA for which USEPA requires a CAAPP permit, pursuant to 40 CFR 70.3(a)(3) [Section 39.5(2)(a)(ii) of the Act]. Specifically, this source is subject to 40 CFR 63 Subpart M – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

Note: See Condition 5.6.2

### 5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (CO, lead, NO<sub>2</sub>, ozone, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>).

### 5.3 Source-Wide Applicable Provisions and Regulations

- 5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.
- 5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:
- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
  - b. Pursuant to 35 IAC 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 the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
- 5.3.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40

CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

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

#### 5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.5 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there are terms for unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	118.86
Sulfur Dioxide (SO <sub>2</sub> )	0.003
Particulate Matter (PM)	6.96
Nitrogen Oxides (NO <sub>x</sub> )	0.53
HAP, not included in VOM or PM	0
Total	126.353

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.3, and 5.10.2.

Note: The source was previously considered a major source of HAPs, however the Permittee's most recent application certifies that the source is currently a minor source of HAPs. However,

the source shall remain subject to 40 CFR 63 Subpart M, the National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products due to the application of the "Once In, Always In" policy.

5.6.3 Other Source-Wide Production and Emission Limitations

Pursuant to 39.5(7)(a) of the Act, the annual emissions from the source shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)
Individual HAP	less than 5.0 tons/year
Combined HAPs	less than 12.5 tons/year

The above limitations are being established in this permit. These limits ensure that the affected source is not subject to future requirements triggered from the major source threshold for HAPs.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, 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:

- a. 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. 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 [35 IAC 201.282(a)].
- b. 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 [35 IAC 201.282(b)].

- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to 39.5(7)(a) of the Act, Condition 5.7.1, and to verify compliance with the requirements of Condition 5.6.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

- a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:
  - Test the top five coatings that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.
- b. Testing may be conducted by the supplier of the HAP-containing material.
- c. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.
- d. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source.

#### 5.9 Source-Wide Recordkeeping Requirements

##### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

#### 5.9.2 Records for HAP Emissions

- a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.
- b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.
- c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each coating, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 - 3%) then the highest value shall be used.

#### 5.9.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

### 5.10 Source-Wide Reporting Requirements

#### 5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

This section is reserved for emissions control programs. As of the date of issuance of this permit, there are no such programs applicable to this source.

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Coating Operations

7.1.1 Description

Four automated and one manual painting booths are in operation at this source, as well as a dipping operation for unpainted machine parts. These painting booths apply paint to heavy off-highway vehicle parts. Some painting booths use drying ovens to quickly dry wet paint. Cleaning solvents are used to clean paint equipment.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed*	Emission Control Equipment
Automated Paint Booth #1	Used to paint heavy off-highway parts	Const: 1978 Mod: 1985	Dry Filter System
Automated Paint Booth #2	Used to paint heavy off-highway parts	Const: 1978 Mod: 1985	Dry Filter System
Automated Paint Booth #3	Used to paint heavy off-highway parts	1997	Dry Filter System
Automated Paint Booth #4	Used to paint heavy off-highway parts	1997	Dry Filter System
Manual Paint Booth	Used to paint larger metal parts	Const: 1978 Mod: 1985	Dry Filter System

\* The existing paint booths and associated equipment were relocated in 2007 (Construction Permits 07040034 and 07060064). The relocation did not result in a modification to the units.

7.1.3 Applicable Provisions and Regulations

- a. The "affected coating operations" for the purpose of these unit-specific conditions, are the coating operations described in Conditions 7.1.1 and 7.1.2.
- b. Pursuant to 40 CFR 63.3890(b), for an existing affected coating operations, the Permittee must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs below:
  - i. For each existing general use coating affected source, limit organic HAP emissions to no more than

0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(b)(1)].

ii. For each existing high performance coating affected source, limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(b)(2)].

c. The affected coating operations are subject to 35 IAC 212.321, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any 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 subsection (b) or (c) of 35 IAC 212.321 (see also Attachment 2) [35 IAC 212.321(a)].

d. i. The affected coating operations (i.e., paint booths) are subject to the requirements of 35 IAC 215.204(k)(2), which provides:

No owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant 35 IAC 211.7150 delivered to the coating applicator:

Heavy Off-highway Vehicle Products:

Type of Coating	kg/l	lb/gal
Extreme performance Prime coat	0.42	3.5
Extreme performance top coat-air dried	0.52	4.3
Final repair coat-air dried	0.58	4.8

#### 7.1.4 Non-Applicability of Regulations of Concern

a. The affected coating operations are not subject to 35 IAC 215.301, because no coating line subject to the limitations of 35 IAC 215.204 is required to meet 35 IAC 215.301 or 215.302, pursuant to 35 IAC 215.209.

b. PM: The affected coating operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating operations do not have potential pre-control

device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

VOM: The affected coating operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating operations do not use an add-on control device to achieve compliance with an emission limitation or standard.

#### 7.1.5 Control Requirements and Work Practices

- a. Pursuant to Sections 39.5(7)(a) and 39.5(7)(d) of the Act, the Permittee shall follow good operating practices for the affected coating operations, including periodic inspections every quarter, routine maintenance and prompt repair of defects.
- b. Pursuant to Sections 39.5(7)(a) and 39.5(7)(d) of the Act:
  - i. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
  - ii.
    - A. Paint booth filter medium, which includes the blanket and pocket filters, shall be replaced, so that the pressure differential across the filter medium does not exceed 0.5 inches of water or the level at which replacement is recommended by the manufacturer to maintain effective filtrating whichever is lower.
    - B. The Permittee shall operate and maintain magnehelic or equivalent measuring devices on each paint booth in order to monitor pressure drop across the filter medium.
  - iii. An adequate inventory of spare filters shall be maintained.
- c.
  - i. Pursuant to 40 CFR 63.3892(a), for any coating operation(s) on which the Permittee use the compliant material option or the emission rate without add-on controls option, the Permittee are not required to meet any operating limits.
  - ii. Pursuant to 40 CFR 63.3893(a), for any coating operation(s) on which the Permittee use the compliant material option or the emission rate without add-on controls option, the Permittee are not required to meet any work practice standards.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected coating operations are subject to the following:

- a. i. VOM emissions from the affected coating operations shall not exceed 118.86 tons per year. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- ii. The above limitations were established in Permit 95120076, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD [T1].

7.1.7 Testing Requirements

- a. Pursuant to Sections 39.5(7)(c) of the Act, to verify compliance with the requirements of Condition 7.1.3 and 7.1.6, the following testing requirements are established:
  - i. A. The Permittee shall perform testing consistent with 7.1.7(ii) annually.
  - B. Test at least the top five coatings that make the largest contributions to individual and total VOM emissions. The largest contributions are defined as the product of usage and VOM content. If two coatings differ only in pigment, then both do not have to be tested.
  - C. Testing may be conducted by the supplier of the VOM containing material so long as the testing is consistent with 7.1.7(ii).
  - ii. A. Pursuant to 35 IAC 215.208, the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 215.105 except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Agency proof that the Method 24 results would not be representative and proof

that a proposed alternative test method gives representative, accurate test results.

- B. For printing inks, the volatile organic material content shall be determined by Method 24A, 40 CFR Part 60, Appendix A incorporated by reference in Section 215.105. Any alternate test method must be approved by the Agency which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s).
- C. If the Agency determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Agency shall approve the proposed alternative.

b. NESHAP Testing: Compliant Material Option

Pursuant to 40 CFR 63.3940, the Permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to 40 CFR 63.3941 and supporting documentation showing that during the initial compliance period, the Permittee used no coating with an organic HAP content that exceeded the applicable emission limit in 40 CFR 63.3890, and that the Permittee used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to 40 CFR 63.3941(a).

Pursuant to 40 CFR 63.3941(a) and 40 CFR 63.3942, demonstration of initial and continuous compliance using the compliant material option shall follow the below methods:

- i. Pursuant to 40 CFR 63.3941(a), the Permittee must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options below:
  - A. Pursuant to 40 CFR 63.3941(a)(1), the Permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified below when performing a Method 311 test:

- I. Pursuant to 40 CFR 63.3941(a)(1)(i), count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the Permittee do not have to count it. Express the mass fraction of each organic HAP the Permittee count as a value truncated to four places after the decimal point (e.g., 0.3791).
  - II. Pursuant to 40 CFR 63.3941(a)(1)(ii), calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).
- B. Pursuant to 40 CFR 63.3941(a)(2), for coatings, the Permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the Permittee may use the alternative method contained in appendix A to 40 CFR 63 Subpart PPPP, rather than Method 24. The Permittee may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to 40 CFR 63 Subpart PPPP, as a substitute for the mass fraction of organic HAP.
  - C. Pursuant to 40 CFR 63.3941(a)(3), the Permittee may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. The Permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
  - D. Pursuant to 40 CFR 63.3941(a)(4), the Permittee may rely on information other than that generated by the test methods specified above, such as manufacturer's formulation data, if it represents each organic HAP that is present at

0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the Permittee do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the Permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to the above, then the test method results will take precedence unless, after consultation, the Permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

- E. Pursuant to 40 CFR 63.3941(a)(5), solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the Permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If the Permittee use the tables, the Permittee must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and the Permittee may use Table 4 only if the solvent blends in the materials the Permittee use do not match any of the solvent blends in Table 3 and the Permittee know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, the Permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- ii. Pursuant to 40 CFR 63.3941(b), the Permittee must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the

supplier or the manufacturer of the material, or by calculation, as specified below. If test results obtained according to (b)(1) below do not agree with the information obtained under paragraph (b)(3) or (4), the test results will take precedence unless, after consultation, the Permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

- A. Pursuant to 40 CFR 63.3941(b)(1), the Permittee may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see 40 CFR 63.14), or ASTM Method D6093-97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see 40 CFR 63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.
- B. Pursuant to 40 CFR 63.3941(b)(2), the Permittee may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. The Permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
- C. Pursuant to 40 CFR 63.3941(b)(3), the Permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.
- D. Pursuant to 40 CFR 63.3941(b)(4), calculation of volume fraction of coating solids. The Permittee may determine the volume fraction of coating solids using Equation 1 below:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

"(Eq. 1)"

Where:

$V_s$  = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{\text{volatiles}}$  = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

$D_{\text{avg}}$  = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see 40 CFR 63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence unless, after consultation the Permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

- iii. Pursuant to 40 CFR 63.3941(c), determine the density of each coating used during the compliance period from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see 40 CFR 63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475-98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation the Permittee demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.
- iv. Pursuant to 40 CFR 63.3941(d), calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 below:

$$H_c = \frac{(D_c)(W_c)}{V_s} \quad (\text{Eq. 2})$$

"(Eq. 2)"

Where:

$H_c$  = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

$D_c$  = Density of coating, kg coating per liter (gal) coating, determined according to 40 CFR 63.3941(c).

$W_c$  = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to 40 CFR 63.3941(a).

$V_s$  = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to 40 CFR 63.3941(b).

v. Pursuant to 40 CFR 63.3941(e), the calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to 40 CFR 63.3941(a). The Permittee must keep all records required by 40 CFR 63.3930 and 63.3931. As part of the notification of compliance status required in 40 CFR 63.3910, the Permittee must identify the coating operation(s) for which the Permittee used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the Permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in 40 CFR 63.3890, and the Permittee used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in 40 CFR 63.3941(a).

vi. A. Pursuant to 40 CFR 63.3942(a), for each compliance period to demonstrate continuous compliance, the Permittee must use no coating for which the organic HAP content (determined using Equation 2 of 40 CFR 63.3941) exceeds the applicable emission limit in 40 CFR 63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to 40 CFR 63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in 40 CFR 63.3940, is the end of a compliance period consisting of that month and the preceding 11 months. If the Permittee

are complying with a facility-specific emission limit under 40 CFR 63.3890(c), the Permittee must also perform the calculation using Equation 1 in 40 CFR 63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

- B. Pursuant to 40 CFR 63.3942(b), if the Permittee choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified above is a deviation from the emission limitations that must be reported as specified in 40 CFR 63.3910(c)(6) and 63.3920(a)(5).
- C. Pursuant to 40 CFR 63.3942(c), as part of each semiannual compliance report required by 40 CFR 63.3920, the Permittee must identify the coating operation(s) for which the Permittee used the compliant material option. If there were no deviations from the applicable emission limit in 40 CFR 63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the Permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in 40 CFR 63.3890, and the Permittee used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to 40 CFR 63.3941(a).
- D. The Permittee must maintain records as specified in 40 CFR 63.3930 and 63.3931.

#### 7.1.8 Monitoring Requirements

Monitoring requirements are not set for the affected coating operations.

#### 7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected coating operations to demonstrate compliance with Conditions 5.6.1, 7.1.3, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. i. The name, use type (i.e., general use or high performance coating), and identification number of each coating as applied on the affected coating operation.

- ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each weekly on each affected coating operation as determined by the procedure described in Condition 7.1.7(a).
- b. The Permittee shall maintain monthly records of the following items to demonstrate compliance with Condition 5.6.1 and 7.1.6:
  - i. Usage of each coating, solvent, thinner, and other materials containing VOM on each affected coating operation, gal/mo and gal/yr.
  - ii. The actual VOM content of each coating, solvent, thinner, and other materials containing VOM as applied on each affected coating operation as determined by the procedure described in Condition 7.1.7(a), lb/gal.
  - iii. The emissions of VOM from each affected coating operation as calculated by the compliance procedure described in Condition 7.1.12(c), lb/mo and ton/yr (12 month rolling average).
- c. The Permittee shall maintain the following records to demonstrate good operating practices and procedures for the dry filter systems in accordance with Condition 7.1.5:
  - i. Records for demonstrating that filters are changed after each shift.
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired.
- d. NESHAP MMMM Recordkeeping:
  - i. Pursuant to 40 CFR 63.3930(a), a copy of each notification and report that the Permittee submitted to comply with this subpart, and the documentation supporting each notification and report. If the Permittee are using the predominant activity alternative under 40 CFR 63.3890(c), the Permittee must keep records of the data and calculations used to determine the predominant activity. If the Permittee are using the facility-specific emission limit alternative under 40 CFR 63.3890(c), the Permittee must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. The Permittee must also keep records of any data used in each

annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

- ii. Pursuant to 40 CFR 63.3930(b), a current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the Permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the Permittee must keep a copy of the complete test report. If the Permittee use information provided to the Permittee by the manufacturer or supplier of the material that was based on testing, the Permittee must keep the summary sheet of results provided to the Permittee by the manufacturer or supplier. The Permittee are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
- iii. Pursuant to 40 CFR 63.3930(c), for each compliance period, the records specified below.
  - A. Pursuant to 40 CFR 63.3930(c)(1), a record of the coating operations on which the Permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the Permittee used.
  - B. Pursuant to 40 CFR 63.3930(c)(2), for the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941.
  - C. Pursuant to 40 CFR 63.3930(c)(3), for the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951.

- iv. Pursuant to 40 CFR 63.3930(d), a record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the Permittee are using the compliant material option for all coatings at the source, the Permittee may maintain purchase records for each material used rather than a record of the volume used.
- v. Pursuant to 40 CFR 63.3930(e), a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
- vi. Pursuant to 40 CFR 63.3930(f), a record of the volume fraction of coating solids for each coating used during each compliance period.
- vii. Pursuant to 40 CFR 63.3930(g), if the Permittee use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
- viii. Pursuant to 40 CFR 63.3930(h), if the Permittee use an allowance in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4), the Permittee must keep records of the information specified below:
  - A. Pursuant to 40 CFR 63.3930(h)(1), the name and address of each TSDF to which the Permittee sent waste materials for which the Permittee use an allowance in Equation 1 of 40 CFR 63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.
  - B. Pursuant to 40 CFR 63.3930(h)(2), identification of the coating operations producing waste materials included in each shipment and the month or months in which the Permittee used the allowance for these materials in Equation 1 of 40 CFR 63.3951.
  - C. Pursuant to 40 CFR 63.3930(h)(3), the methodology used in accordance with 40 CFR 63.3951(e)(4) to determine the total amount of waste materials sent to or the amount

collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

- ix. Pursuant to 40 CFR 63.3930(j), the Permittee must keep records of the date, time, and duration of each deviation.

#### 7.1.10 Reporting Requirements

##### a. Reporting of Deviations

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

- i. Emissions of VOM from the affected coating operations in excess of the limits specified in Conditions 7.1.3 and 7.1.6 within 30 days of such occurrence.
  - A. The notification shall include:
    - I. Identification of the limit that may have been exceeded.
    - II. Duration of the possible exceedance.
    - III. An estimate of the amount of emissions in excess of the applicable standard.
    - IV. A description of the cause of the possible exceedance.
    - V. When compliance was reestablished.
- ii. The Permittee shall submit the following information along with its annual emission report:
  - A. A summary of exceedances of the limits in Conditions 7.1.3 or 7.1.6, if any, which required notification to the Compliance Section in accordance with Condition 7.1.10(a).
  - B. The annual emissions of VOM from the affected coating operations for each month of the

previous calendar year, to demonstrate compliance with Condition 7.1.6, tons/year (e.g., for the month of January, the emissions from February, of the preceding calendar year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).

iii. NESHAP reporting requirements:

Pursuant to 40 CFR 63.3920(a), the Permittee must submit semiannual compliance reports for each affected coating operation according to the requirements below. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) below.

- A. Pursuant to 40 CFR 63.3920(a)(1), unless the Administrator has approved or agreed to a different schedule for submission of reports under 40 CFR 63.10(a), the Permittee must prepare and submit each semiannual compliance report according to the dates specified below. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
  - I. Pursuant to 40 CFR 63.3920(a)(1)(i), the first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in 40 CFR 63.3940, 40 CFR 63.3950, or 40 CFR 63.3960 that applies to the Permittee affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.
  - II. Pursuant to 40 CFR 63.3920(a)(1)(ii), each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
  - III. Pursuant to 40 CFR 63.3920(a)(1)(iii), each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is

the first date following the end of the semiannual reporting period.

- IV. Pursuant to 40 CFR 63.3920(a)(1)(iv), for each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) above.
  
- B. Pursuant to 40 CFR 63.3920(a)(2), each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
  
- C. Pursuant to 40 CFR 63.3920(a)(3), the semiannual compliance report must contain the information specified below:
  - I. Pursuant to 40 CFR 63.3920(a)(3)(i), company name and address.
  
  - II. Pursuant to 40 CFR 63.3920(a)(3)(ii), statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

- III. Pursuant to 40 CFR 63.3920(a)(3)(iii), date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
  - IV. Pursuant to 40 CFR 63.3920(a)(3)(iv), identification of the compliance option or options specified in 40 CFR 63.3891 that the Permittee used on each coating operation during the reporting period. If the Permittee switched between compliance options during the reporting period, the Permittee must report the beginning and ending dates for each option the Permittee used.
  - V. Pursuant to 40 CFR 63.3920(a)(3)(v), if the Permittee used the emission rate without add-on controls or the emission rate with add-on controls compliance option (40 CFR 63.3891(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
  - VI. Pursuant to 40 CFR 63.3920(a)(3)(vi), if the Permittee used the predominant activity alternative (40 CFR 63.3890(c)(1)), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report.
  - VII. Pursuant to 40 CFR 63.3920(a)(3)(vii), if the Permittee used the facility-specific emission limit alternative (40 CFR 63.3890(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period.
- D. Pursuant to 40 CFR 63.3920(a)(4), if there were no deviations from the emission limitations in 40 CFR 40 CFR 63.3890, 63.3892, and 63.3893 that apply to the Permittee, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If

the Permittee used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in 40 CFR 63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

- E. Pursuant to 40 CFR 63.3920(a)(5), if the Permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in 40 CFR 63.3890, the semiannual compliance report must contain the information below.
  - I. Pursuant to 40 CFR 63.3920(a)(5)(i), identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
  - II. Pursuant to 40 CFR 63.3920(a)(5)(ii), the calculation of the organic HAP content (using Equation 2 of 40 CFR 63.3941) for each coating identified in paragraph (a)(5)(i) of this section. The Permittee do not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).
  - III. Pursuant to 40 CFR 63.3920(a)(5)(iii), the determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. The Permittee do not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).
  - IV. Pursuant to 40 CFR 63.3920(a)(5)(iv), a statement of the cause of each deviation.
- F. Pursuant to 40 CFR 63.3920(a)(6), if the Permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in 40 CFR

63.3890, the semiannual compliance report must contain the information below.

- I. Pursuant to 40 CFR 63.3920(a)(6)(i), the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in 40 CFR 63.3890.
- II. Pursuant to 40 CFR 63.3920(a)(6)(ii), the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The Permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of 40 CFR 63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4). The Permittee do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).
- III. Pursuant to 40 CFR 63.3920(a)(6)(iii), a statement of the cause of each deviation.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating operations without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.1.7, and the affected coating operations remains in compliance with Condition 7.1.3.
- b. Changes in equipment if they are done solely for purposes of downsizing, general equipment maintenance, or improved process safety. These changes must not result in an increase in potential emissions of any regulated air pollutant.

#### 7.1.12 Compliance Procedures

Pursuant to Sections 39.5(7)(a) of the Act:

- a. Compliance with the PM emission limitation of Condition 7.1.3(c) is addressed by the requirements of Conditions 7.1.5(a) and (b) and the records and reports required in Conditions 7.1.9(c) and 7.1.10(a).
- b. Compliance with the HAP emission limitations of Condition 7.1.3(b) is addressed by the requirements of Conditions 7.1.5(a), the testing requirements in Condition 7.1.7(b), the records required in Condition 7.1.9(d), and the reports required in Condition 7.1.10(a).
- c.
  - i. Compliance with the VOM emission limitations of Conditions 7.1.3(d) and 7.1.6(a) is addressed by the requirements of Conditions 7.1.5(a), the VOM testing requirements in Condition 7.1.7(a), the records required in Conditions 7.1.9(a) and (b), and the reports required in Condition 7.1.10(a).
  - ii. Emissions from the affected coating operations shall be determined by the following emission factors and formulas:

$$E = \sum_{i=1}^n V_i C_i$$

Where:

$E$  = VOM emissions from the affected coating operations (Lbs)

$V_i$  = Volume of each coating, solvent, thinner, and other materials containing VOM used (Gal)

$C_i$  = Actual VOM content of each coating, solvent, thinner, and other materials containing VOM (Lb/Gal)

$n$  = Total number of coatings, solvents, thinners, and other materials containing VOM used

$i$  = Subscript denoting a specific coating, solvent, thinner, and other material containing VOM.

## 7.2 Cold Cleaning Operations

### 7.2.1 Description

A manual cold cleaning operation for larger parts using solvent soaked shop towels. The solvent used is methyl ethyl keytone (MEK).

Note: This narrative description is for informational purposes only and is not enforceable.

### 7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Cold Cleaning Operation #1	Manual solvent cleaning (soaked shop towels)	---	None
Cold Cleaning Operation #2	Cold Cleaning Degreaser	---	None

### 7.2.3 Applicable Provisions and Regulations

- a. The "affected cold cleaning operations" for the purpose of these unit-specific conditions, are the cold cleaning operations described in Conditions 7.2.1 and 7.2.2.
- b. The affected cold cleaning operations are subject to the work practices of 35 IAC 215.182, see Condition 7.2.5.
- c. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

### 7.2.4 Non-Applicability of Regulations of Concern

- a. The affected cold cleaning operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected cold cleaning operations does not use an add-on control device to achieve compliance with an emission limitation or standard.

### 7.2.5 Control Requirements and Work Practices

- a. The Permittee shall follow good operating practices for the affected cold cleaning operations, including periodic

inspection every quarter, routine maintenance and prompt repair of defects.

- b. i. Pursuant to 35 IAC 215.182(a):

Operating Procedures: No person shall operate a cold cleaning degreaser unless:

- A. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere.
- B. The cover of the degreaser is closed when parts are not being handled.
- C. Parts are drained until dripping ceases.

- ii. Pursuant to 35 IAC 215.182(b):

Equipment Requirements: No person shall operate a cold cleaning degreaser unless:

- A. 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, counterweights, or a powered system if:
  - I. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F).
  - II. The solvent is agitated.
  - III. The solvent is heated above ambient room temperature.
- B. The degreaser is equipped with a facility for draining cleaned parts. The drainage facility shall be constructed so that parts are enclosed under the cover while draining unless:
  - I. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
  - II. An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.

- C. 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 1/4°F) or if the solvent is heated above 50°C (120°F) or its boiling point:
  - I. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
  - II. Any other equipment or system of equivalent emission control as approved by the Agency. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
- D. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- E. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected cold cleaning operations. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.2.7 Testing Requirements

Testing requirements are not set for the affected cold cleaning operations. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.2.8 Monitoring Requirements

- a. The Permittee shall perform inspections for the affected cold cleaning operations every quarter to maintain compliance with the requirements of 35 IAC 215.182 (Condition 7.2.5(b)(ii)).

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected cold cleaning operations to demonstrate compliance with Conditions 5.6.1 and 7.1.5, pursuant to Section 39.5(7)(b) of the Act:

- a.
  - i. The name and identification number of each solvent used for the affected cold cleaning operation.
  - ii. The vapor pressure of the solvent measured in mmHg at 20°C (68°F)
  - iii. Usage of each solvent containing VOM on the affected cold cleaning operations, gal/mo and gal/yr (12 month rolling average).
  - iv. The emissions of VOM from the affected cold cleaning operations, lb/mo and ton/yr (12 month rolling average).
  - v. The hours of operation for the affected cold cleaning operation, hr/mo and hr/yr (12 month rolling average).
- b. Records, including inspection reports, necessary to show compliance with the equipment requirements of 35 IAC 215.182 (Condition 7.2.5(b)(ii)).

7.2.10 Reporting Requirements

a. Reporting of Deviations

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

- i. Operation of the affected cold cleaning operations out of compliance with the operational and work practices specified in Condition 7.2.5 within 30 days of such occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected cold cleaning operations.

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.5 is addressed by the records and reports required in Conditions 7.2.9 and 7.2.10.
- b. Compliance with the emission limit in Condition 7.2.3(c) is addressed by the records and reports required in Conditions 7.2.9(a) and 7.2.10(a) and the formulas listed below:

VOM Emissions, monthly average lb/hr =

VOM emissions lb/mo ÷ hrs/mo

VOM Emissions, annual average lb/hr =

(VOM emissions T/yr x 2000 lb/T) ÷ hrs/yr

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after January 11, 2012 (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

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

## 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

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

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

#### 8.6.2 Test Notifications

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

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

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The

test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

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

#### 8.6.4 Reporting Addresses

- a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

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

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

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

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

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

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment),

practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply with Other Requirements

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

#### 9.5 Liability

##### 9.5.1 Title

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

##### 9.5.2 Liability of Permittee

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

##### 9.5.3 Structural Stability

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

##### 9.5.4 Illinois EPA Liability

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

##### 9.5.5 Property Rights

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

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

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

### 9.6.2 Records of Changes in Operation

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

### 9.6.3 Retention of Records

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

## 9.7 Annual Emissions Report

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

## 9.8 Requirements for Compliance Certification

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

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

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

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

#### 9.11 Permanent Shutdown

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

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

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

##### 9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

#### 9.12.4 Duty to Provide Information

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

#### 9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

**10.0 ATTACHMENTS**

Attachment 1 Example Certification by a Responsible Official

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

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

P = Process weight rate; and  
E = Allowable emission rate; and,

A. Up to process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

P = Process weight rate; and  
 E = Allowable emission rate; and,

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, [www.epa.state.il.us](http://www.epa.state.il.us). This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-revising.pdf](http://www.epa.state.il.us/air/caapp/caapp-revising.pdf)

Guidance On Renewing A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-renewing.pdf](http://www.epa.state.il.us/air/caapp/caapp-renewing.pdf)

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

[www.epa.state.il.us/air/caapp/index.html](http://www.epa.state.il.us/air/caapp/index.html)

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)

RWC:95120076:psj