PRELIMINARY DRAFT CAAPP PERMIT
July 12, 2011

Attention:

Icon Identity Solutions
Attn: Shawn Hyken
2480 Greenleaf Avenue
Elk Grove Village, Illinois 60007

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

Icon Identity Solutions
2480 Greenleaf Avenue
Elk Grove Village, Illinois 60007

I.D. No.: 031440AKK
Permit No.: 98080019

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/782-2113

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application:	Renewal
Purpose of Application:	Renew Existing CAAPP Permit for 5 Years
ID No.:	031440AKK
Permit No.:	98080019
Statement of Basis No.:	98080019-1
Date Application Received:	May 22, 2009
Date Issued:	TO BE DETERMINED
Expiration Date:	TO BE DETERMINED
Renewal Submittal Date:	9 Months Prior to (TO BE DETERMINED)
Source Name:	Icon Identity Solutions
Address:	2480 Greenleaf Avenue
City:	Elk Grove Village
County:	Cook
ZIP Code:	60007

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

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

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

ECB:MTR:AB:psj

cc: IEPA, Permit Section
IEPA, FOS, Region 1

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Section 1 – Source Information

1. Addresses

Source

Icon Identity Solutions
2480 Greenleaf Avenue
Elk Grove Village, IL 60007

Owner

Icon Identity Solutions
2480 Greenleaf Avenue
Elk Grove Village, IL 60007

Operator

Icon Identity Solutions
2480 Greenleaf Avenue
Elk Grove Village, IL 60007

Permittee

The owner or operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	Name	*Title*
Responsible Official	Shawn Hyken	V.P. of Manufacturing
Delegated Authority	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	Name	*Phone No.*	*Email*
Source Contact	Shawn Hyken	847/212-0183	N/A
Technical Contact	Shawn Hyken	847/212-0183	N/A
Correspondence	Shawn Hyken	847/212-0183	N/A
Billing	N/A	N/A	N/A

3. Single Source

The source shall be defined to include all the following source(s):

I.D. No.	*Permit No.*	*Single Source Name and Address*
N/A	N/A	N/A

Section 2 – General Permit Requirements

1. Prohibitions

a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m). [Section 39.5(6)(a) of the Act]

b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5), the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]

c. No owner or operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]

d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

a. Pursuant to Section 39.5(7)(k) of the Act, the owner or operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

   i. An emergency occurred and the source can identify the cause(s) of the emergency.

   ii. The source was at the time being properly operated.

   iii. The source submitted notice of the emergency to the IEPA within 2 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.

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

b. For purposes of Section 39.5(7)(k), “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to

restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.

c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source 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]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source 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]

c. Duty to Maintain Equipment

The source 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. [Section 39.5(7)(a) of the Act]

d. 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. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

i. The source must pay fees to the IEPA 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]

ii. The IEPA shall asses annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 3(c), at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]

iii. 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. Include on the check: ID #, Permit #, and "CAAPP Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a) and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. Sample or monitor any substances or parameters at any location at reasonable times:

A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or

B. As otherwise authorized by the Act.

v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:

A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.

B. The liability of the owner or operator of the 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.

D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 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. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this 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 source 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]

4. Testing

a. 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 IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator: The IEPA 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 IEPA, at such reasonable times as may be specified by the IEPA 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 IEPA shall have the right to observe all aspects of such tests.

ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, 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.

5. Recordkeeping

a. 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. [Section 39.5(7)(a) of the Act]

b. Retention of Records

i. 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]

ii. 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 different period is specified by a particular permit provision pursuant to Section 39.5(7)(a) of the Act.

c. Availability of Records

i. The Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.

ii. Upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by including the following:

A. The identification of each term or condition of this permit that is the basis of the certification.

B. The compliance status.

C. Whether compliance was continuous or intermittent.

D. 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.

ii. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section pursuant to Section 39.5(7)(p)(v)(D). Addresses are included in Attachment 3.

iii. All compliance reports required to be submitted shall include a certification in accordance with Condition 2.6 pursuant to Section 39.5(7)(p)(i) of the Act.

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source 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 in Attachment 4 of this permit.

7. Permit Shield

a. Except as provided in Condition 2.7 below, the source has requested and has been granted a permit shield pursuant to Section 39.5(7)(j) of the Act. 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 IEPA, 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 _____ (date USEPA notice started), unless this permit has been modified to reflect such new requirements.

b. Pursuant to Section 39.5(7)(j) of the Act, 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.

8. Title I Conditions

As generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA pursuant to Sections 39(a), 39(f) and 39.5(7)(a) of the Act.

a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an “applicable Clean Air Act requirement” or an “applicable requirement” in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.

b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as “TIR”.

i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".

i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.

ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. 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 source 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]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;

iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or

iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

The IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA 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 source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. 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]

11. Permit Renewal

a. 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 the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]

b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the 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.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(5)(s) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 – Source Requirements

1. Applicable Requirements

The Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Illinois Environmental Protection Act. These requirements are applicable to all emission units (including insignificant activities) at the source.

a. Fugitive Particulate Matter

i. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph. [35 IAC 212.301 and 35 IAC 212.314]

ii. Periodic Monitoring Compliance Method. Fugitive dust emissions from the source shall be monitored daily for a week once per year upon request by the Illinois EPA. Observations shall begin within five days of receipt of such written request and conducted as specified in the request. A record of these observations shall be maintained by the Permittee identifying if fugitive dust was observed, where the observer, date and time of observations, the location from which observations were made, weather conditions, fugitive dust originated from, and corrective actions taken to eliminate the fugitive dust.

b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, the Permittee shall comply with the requirements in Section 7.2 of this permit and ERMS seasonal emissions of VOM during the seasonal allotment period from May 1 through September 30 shall not exceed 10 tons.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

i. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

ii. 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.

iii. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

iv. Any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR Subpart B, Servicing of Motor Vehicle Air Conditioners.

v. All persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

i. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).

ii. During demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. Future Emission Standards

i. Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit.

ii. The Permittee 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 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

The Permittee shall comply with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Illinois Environmental Protection Act. These requirements are applicable to all emission units (including insignificant activities) at the source.

a. Fugitive PM Operating Program

i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:

A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.

B. Estimated frequency of application of dust suppressants by location.

C. Such other information as may be necessary to facilitate the IEPA’s review of the Fugitive PM Operating Program.

ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the

IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

iii. The Fugitive PM Operating Program, as submitted by the Permittee on July 1, 2011, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions.

iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. Episode Action Plan

Should this source become subject to 35 IAC 244.142, the Permittee shall prepare, submit, and operate under an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures and submitted to the IEPA for its review. The Episode Action Plan shall contain the information specified in 35 IAC 244.144. The Permittee shall immediately implement the appropriate steps described in this Episode Action Plan should an air pollution alert or emergency be declared. Any future Episode Action Plan made by the Permittee during the permit term is automatically incorporated by reference provided the Episode Action Plan is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Episode Action Plan. In the event that the IEPA notifies the Permittee of a deficiency with any Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to 39.5(7)(a) of the Illinois Environmental Protection Act.

c. 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 Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements.

4. Synthetic Minor Limits

a. Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall not exceed the following limits established below:

HAP	HAP Usage (Ton/year)	HAP Emissions (Ton/year)
Individual HAP	7.5	7.5
Total HAP's	15.0	15.0

This condition is being imposed so that the source is not a major source of HAP emissions. Note: these limits are based on the USEPA policy ("once in – always in" provision) and the source is considered to be major for the underlined MACT standard, 40 CFR Part 63, Subpart MMMM.

b. Compliance Method (Periodic Monitoring)

i. Pursuant to Section 39.5(7)(d), 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. Pursuant to 39.5(7)(d) of the Act, the Permittee shall keep monthly and annual records of individual and total HAP usage (ton/mo and ton/yr) and HAP emissions (ton/mo and ton/yr).

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Illinois Environmental Protection Act.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:

- Requirements in Conditions 3.1(a) and 3.1(b).
- Requirements in Condition 3.4(a).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall promptly notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

b. Semiannual Monitoring Reporting

i. Pursuant to Section 39.5(7)(f), the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing

deviations from required periodic monitoring addressed in the Compliance Methods in this Permit. This report shall be submitted every six months as follows, unless more frequent reporting is required in other parts of this permit. Addresses are included in Attachment 3.

Monitoring Period	Report Due Date
January through June	July 31
July through December	January 31

ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

i. Pursuant to 35 IAC Part 254, the Permittee shall submit an Annual Emission Report due by May 1 of the year following the calendar year in which the emissions took place.

ii. Pursuant to 35 IAC 254.134, the Permittee shall keep all records and calculations upon which the verified and reported data are based for a minimum of 3 years following the filing a complete report.

d. **Other Reporting**

All other deviations not specifically addressed in Condition 3.5(a) or (b) shall be reported in accordance with the cited applicable requirements.

Section 4 – Emission Unit Requirements

4.1 Paint Spray Booths

1. Emission Units

Emission Units	Regulated Pollutants	Original Construction Date	Last Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Four (4) Paint Spray Booths with Ovens	VOM, HAP, PM	1998	None	Four (4) filters (one per each booth)	None
Four (4) Ovens	VOM, SO_2	1998	None	None	None

2. Applicable Requirements

The Permittee shall operate the above emission units in accordance with the following applicable requirements pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Illinois Environmental Protection Act.

a. i. Opacity Requirements

A. 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.

ii. Periodic Monitoring Compliance Method (Opacity Requirements)

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform a monthly inspection of all filters to ensure proper operation.

B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep records of such inspections which include the date of the inspections and its results.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, to exceed the allowable emission rates specified in 35 IAC 212.321(c).

B. Pursuant to construction permit 97120020, PM emissions from each spray booth shall not exceed 0.1 lb/hr [T1].

ii. Periodic Monitoring Compliance Method (PM Requirements)

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform a monthly inspection of all filters to ensure proper operation.

B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep records of such inspections which include the date of the inspections and its results.

C. Pursuant to Section 39.5(7)(a) and (d) of the Act, the Permittee shall keep monthly and annual records of solids in applied coatings separately for each coating booth.

c. i. Sulfur Dioxide Requirements (SO_2)

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.

ii. Periodic Monitoring Compliance Method (SO_2 Requirements)

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform semi-annual inspections of the paint spray booth ovens to ensure that the burners and associated equipment is functioning properly in accordance with manufacturer's specifications or procedures established by the Permittee.

B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep records of such inspections to ensure proper operation of ovens and a copy of manufacturer's specifications or operational procedures established by the Permittee for ovens. The Permittee shall also keep on file a document from the gas company certifying the sulfur content in the supplied natural gas does not exceed 2000 ppm.

d. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.204(j)(1), the VOM content in the clear coating applied to the miscellaneous metal parts shall not exceed 0.52 kg/l (4.3 lb/gal).

B. Pursuant to 35 IAC 218.204(j)(2), the VOM content in extreme performance coatings applied to the miscellaneous metal parts shall not exceed the following limits:

- Air dried: 0.42 kg/l (3.5 lb/gal)
- Baked: 0.40 kg/l (3.3 lb/gal)

C. The emission limitations from above are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

D. Pursuant to construction permit 97120020, the Permittee shall not exceed the following limits [T1]:

Material	VOM Emissions (lb/mo)	VOM Emissions (ton/yr)
Coatings	3,981	18.9
Clear Coatings	306	1.49

Material	VOM Emissions (lb/mo)	VOM Emissions (ton/yr)
Clean-up Solvents	1,016.7[a]	4.48[a]
	Total:	24.87

[a] Net figure after credit for return of contaminated material.

E. Pursuant to construction permit 97120020, VOM emissions from all ovens shall not exceed 0.1 ton/yr and are based on the maximum natural gas usage of 35 $mmft^3/yr$ [T1].

ii. Periodic Monitoring Compliance Method (VOM Requirements)

A. Pursuant to 35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act, testing for VOM content of coatings and cleanup solvents shall be performed as follows:

- On an annual basis, the VOM content of representative coatings “as applied” on the paint spray booths shall be determined according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

- The VOM content of the cleaning solvents used on each paint spray booth shall be tested annually according to Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a), 218.208, and 218.211(a).

- This testing may be performed by the supplier of a material provided that the supplier provides documentation for such testing to the Permittee and the Permittee’s records directly reflect the application of such material and separately account for any additions of solvent [35 IAC 218.105(a), 218.208, and 218.211(a)].

B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall keep the following records:

Coating:

- The usage of each coating, in units of gallons/month and gallons/year.
- Density of each coating in units of lb/gallon.
- VOM content of each coating in weight percent.
- 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 day on the affected coating operations.

Cleanup Solvents:

- VOM content of each cleanup solvent used in lbs/gal.
- Amount of each cleanup solvent used in gal/month and gal/year.

VOM Emissions:

- Total monthly and annual VOM emissions from all coating operations (ton/mo and ton/yr).
- Records of natural gas usage (scfm/yr).
- Total monthly and annual VOM emissions from natural gas combustion in the ovens (lb/mo and ton/yr) with supporting documentation to justify how the VOM emissions were determined.
- Compliance with annual limits of Conditions 4.1(2)((d)(i)(D) and (E) shall be determined from a running total of 12 months of data [T1].

VOM Content Testing (wt.%):

- Identification of material tested;
- Results of analyses or supplier documentation;
- Documentation of analysis methodology; and
- Person performing analysis.

e. i. Hazardous Air Pollutant Requirements (HAP)

Pursuant to 40 CFR 63.3890(b)(1), (b)(2) and (b)(5), the Permittee shall comply with the following limits for different coatings in use for surface metal coating:

A. HAP content in each general use coating shall not exceed 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)];

B. HAP content in each high performance coating shall not exceed 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)]; and

C. HAP content in each extreme performance fluoropolymer coating shall not exceed 1.5 kg (12.4 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(b)(5)].

ii. Periodic Monitoring Compliance Method (HAP Requirements)

A. Pursuant to 40 CFR 63.3891(b), the Permittee shall include all coatings (as defined in 40 CFR 63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.3890(b) (see condition above). To make this determination, the Permittee shall use the following compliance option listed in 40 CFR 63.3891(b):

Emission rate without add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and

cleaning materials used in the coating operations(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.3890(b), calculated as a rolling 12-month emission rate and determined on a monthly basis. The Permittee shall meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

B. Pursuant to 40 CFR 63.3952(a), to demonstrate continuous compliance, the organic HAP emissions rate for each compliance period, determined according to 40 CFR 63.3951(a) through (g), shall be less than or equal to the applicable emission limit in 40 CFR 63.3890(b). A compliance period consists of 12 months and each month after the end of the initial compliance period described in 40 CFR 63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. The Permittee shall perform the calculations in 40 CFR 63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation.

C. Pursuant to 40 CFR 63.3930, the Permittee shall keep the following records. Failure to collect and keep these records is a deviation from the applicable standard, pursuant to 40 CFR 63.3930:

- A copy of each notification and report submitted to comply with 40 CFR 63 Subpart MMMM, and the documentation supporting each notification and report.

- 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 testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids was conducted, the Permittee should keep a copy of the complete test report. If the Permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the Permittee should keep the summary sheet of results provided by the manufacturer or supplier. The Permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

D. Pursuant to 40 CFR 63.3930(c), for each compliance period, the following specified records shall be kept:

- 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.

E. 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 is 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.

F. 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.

G. Pursuant of 40 CFR 63.3930(f), a record of the volume fraction of coating solids for each coating used during each compliance period.

H. Pursuant to 40 CFR 63.3930(g), a record of the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

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

J. Pursuant to 40 CFR 63.3931(a), the records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

K. Pursuant to 40 CFR 63.3931(b) and 40 CFR 63.10(b)(1), the Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

L. Pursuant to 40 CFR 63.3931(c), the Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The Permittee may keep the records off-site for the remaining 3 years.

3. Non-Applicability Determinations

The Permittee is not subject to the following:

a. 40 CFR 64, Compliance Assurance Monitoring (CAM)

i. For control of VOM/HAP emissions, paint spray booths do not use an add-on control device to achieve compliance with an emission limitation or standard.

ii. For control of PM emissions, each paint spray booth does not have potential pre-control device PM emissions that equals or exceeds major source threshold levels.

b. 35 IAC Part 218 Subpart G: Use of Organic Material

35 IAC 218.209 exempts miscellaneous metal parts coating operations subject to 35 IAC 218.204 from applicability of 35 IAC 218.301 and 218.302.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for the paint spray booths and ovens.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to 39.5(7)(f) of the Illinois Environmental Protection Act.

a. Prompt Reporting

i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements, unless a NESHAP standard specifies a different time frame, as follows:

- Requirements in Conditions 4.1(2)(a)(i), 4.1(2)(b)(i), 4.1(2)(c)(i) and 4.1(2)(d)(i).

B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).

iii. The deviation reports shall contain at a minimum the following information:

A. Date and time of the deviation.

B. Emission unit(s) and/or operation involved.

C. The duration of the event.

D. Probable cause of the deviation.

E. Corrective actions or preventative measures taken.

b. **Reporting of Deviation [40 CFR 63.3920(a)(5)]**

If the Permittee uses a compliant material option and there was a deviation from the applicable organic HAP content requirements in 40 CFR 63.3890, the semiannual compliance report shall contain the following information:

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. The calculation of the organic HAP content (using Equation 2 of 40 CFR 63.3941) for each coating identified in 40 CFR 63.3920(a)(5)(i). The Permittee is not required to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).

iii. The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph 40 CFR

63.3920(a)(5)(i) (a)(5)(i). The Permittee is not required to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).

iv. A statement of the cause of each deviation.

c. <u>Other Reporting</u>

Semiannual compliance reports for purposes of 40 CFR 63 Subpart MMMM, as required by 40 CFR 63.3920(a), shall be submitted along with the semiannual monitoring report required by Condition 3.5(b) of this permit.

Section 5 – Title I Requirements

This section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this section.

Section 6 – Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.146, the following activities at the source constitute insignificant activities obligated to comply with Sections 9.1(d) and 39.5 of the Act; Sections 165, 173, and 502 of the Clean Air Act or any other applicable permit or registration requirements. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any Insignificant Activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities:

Insignificant Activity	Number of Units	Insignificant Activity Category
MIG Welders	27	35 IAC 201.210(a)(3))
Heaters	26	35 IAC 201.210(a)(4)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

a. 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 35 IAC 212.122, except as provided in 35 IAC 212.123(b).

b. Pursuant to 35 IAC 212.321 or 212.321, 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 at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.

c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.

5. Compliance Method (Periodic Monitoring)

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items:

a. List of all insignificant activities, including insignificant activities added as specified in Condition 5.6, the categories the insignificant activities fall under, and supporting calculations as needed.

b. Potential to emit emission calculations before any air pollution control device for each insignificant activity.

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Construction Permit Required

i. Pursuant to 35 IAC 201.146, for the addition of an insignificant activity that would be subject to specific regulations as describe in Condition 5.1, i.e., subject to the NSPS or NESHAP, a construction permit is required.

ii. Pursuant to 35 IAC 201.212(b) and Section 39.5(12)(b) of the Act, for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Condition 5.2, a construction permit is required.

b. Notification 7 Days in Advance

Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Section 39.5(12)(a) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Condition 5.2, a notification to the IEPA Permit Section pursuant to Section 39.5(12)(b) of the Act 7 days in advance of the addition of the insignificant activity. A construction permit is not required. Addresses are included in Attachment 3.

c. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Condition 5.2, a notification is not required until the renewal of this permit. A construction permit is not required.

d. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 5.3, a notification is not required. A construction permit is not required.

Section 7 – Other Requirements

1. Testing

a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The Illinois EPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the Illinois EPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the Illinois EPA, Compliance Section and Illinois EPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:

i. The name and identification of the emission unit(s) being tested.

ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.

iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.

iv. 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 emission unit and any control equipment will be determined.

v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.

vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.

vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.

viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.

ix. Sampling of materials, QA/QC procedures, inspections, etc.

b. The Illinois EPA, Compliance Section shall be notified prior to these tests to enable the Illinois EPA to observe these tests pursuant to Section 39.7(a) as follows:

i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.

ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The Illinois EPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the Illinois EPA's ability to observe testing.

c. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the Illinois EPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a). The Final Report shall include as a minimum:

i. General information including emission unit(s) tested.

ii. A summary of results.

iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).

iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.

v. Detailed description of test conditions, including:

A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.

B. Control equipment information, i.e., equipment condition and operating parameters during testing.

C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.

vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.

vii. An explanation of any discrepancies among individual tests or anomalous data.

viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.

ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.

x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.

d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. Emissions Reduction Market System (ERMS) Requirements

a. Pursuant to 35 IAC Part 205, ERMS seasonal emissions of VOM during the seasonal allotment period from May 1 through September 30 shall not exceed 10 tons/year.

b. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:

   i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 3 and 4 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period.

   ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 3 and 4 of this permit.

   iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.

c. In the event that the source’s VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

Section 8 – State Only Requirements

The requirements in this Section are not federally enforceable.

1. Permitted Emissions for Fees

The annual actual emissions from the source for purposes of "duty to pay fees" (Condition 2.3(e)), not considering insignificant activities as addressed by Section 6, 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. See Section 39.5(18) of the Act.

Pollutant		Tons/Year
Volatile Organic Material	(VOM)	25.0
Sulfur Dioxide	(SO_2)	0.02
Particulate Matter	(PM)	1.59
Nitrogen Oxides	(NO_x)	2.67
HAP, not included in VOM or PM	(HAP)	---
Total		29.28

2. VOM RACT Requirements

a. Pursuant to 35 IAC 218.204(j), on and after May 1, 2012, the limitations in 35 IAC 218.204(q) shall apply to the category of miscellaneous metal parts coating.

i. Pursuant to 35 IAC 218.204(q)(1)(A)(iii) and (1)(G), the Permittee shall not apply coatings by exceeding the following limits of each applied coating:

Coating	Kg/l* (lb/gal)* coatings	Kg/l (lb/gal) solids
Clear Coating (General one component coating)	0.52 (4.3)	1.24 (10.34)
Extreme Performance Coating (Air dried)	0.42 (3.5)	0.80 (6.67)
Extreme Performance Coating (Baked)	0.36 (3.0)	0.61 (5.06)

* The emission limitations from above are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition.

ii. Pursuant to 35 IAC 218.211(c)(1), by May 1, 2012, the Permittee shall certify to the Illinois EPA that coating operations are in compliance with applicable requirements of 35 IAC 218.204(q).

iii. Pursuant to 35 IAC 218.211(c)(2), starting May 1, 2012, the Permittee shall fulfill recordkeeping requirements for addressing compliance with appropriate limitations of 35 IAC 218.204(q).

b. Pursuant to 35 IAC 218.204(q)(2), on or after May 1, 2012, miscellaneous plastic parts and products coating operations will be subject to the newly established emission limits. Pursuant to 35 IAC 218.211(c)(1), by May 1, 2012, the Permittee shall certify to the Illinois EPA that coating operations are in compliance with applicable requirements of 35 IAC 218.204(q)(2) and pursuant to 35 IAC 218.211(c)(2), starting May 1, 2012, the Permittee shall fulfill recordkeeping requirements for addressing compliance with appropriate limitations of 35 IAC 218.204(q)(2).

Attachment 1 – List of Emission Units at This Source

Section	Emission Units	Description
4.1	Four (4) Paint Spray Booths with Ovens	Coating of metal and plastic signs

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
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
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO_2	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
^{o}F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H_2S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts

LAER	Lowest Achievable Emission Rate
lb	Pound
m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS .	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
CFR	Codified Federal Regulation
SO_2	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

Attachment 3 - Contact and Reporting Addresses

IEPA Compliance Section	Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276 Phone No.: 217/782-2113
IEPA Stack Test Specialist	Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016 Phone No.: 847/294-4000
IEPA Air Quality Planning Section	Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276 Phone No.: 217/782-2113
IEPA Air Regional Field Operations Regional Office #1	Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, IL 60016 Phone No.: 847/294-4000
IEPA Permit Section	Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506 Phone No.: 217/782-2113
USEPA Region 5 - Air Branch	USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604 Phone No.: 312/353-2000

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE