Draft CAAPP PERMIT
February 27, 2008

217/782-2113

"RENEWAL"
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Mitsubishi Motors North America, Inc.
Attn: Eugene Schlueter
100 North Mitsubishi Motorway
Normal, Illinois 61761-8099

I.D. No.: 113813AAE
Application No.: 95120297

Date Received: January 3, 2007
Date Issued: To Be Determined
Expiration Date[1]: To Be Determined

Operation of: Automobile Assembly Facility
Source Location: 100 North Mitsubishi Motorway, Normal, McLean County
Responsible Official: Gary Schultz, Vice President

This permit is hereby granted to the above-designated Permittee to OPERATE a Automobile Assembly Facility, 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 Dan Punzak at 217/782-2113.

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

ECB:DGP:psj

cc: Illinois EPA, FOS, Region 3
CES
Lotus Notes

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

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1.0 INTRODUCTION

1.1 Source Identification

Mitsubishi Motors North America, Inc.
100 North Mitsubishi Motorway
Normal, Illinois 61761-8099
309/888-8000

I.D. No.: 113813AAE
County: McLean
Standard Industrial Classification: 3711, Automobile Assembly

1.2 Owner/Parent Company

Mitsubishi Motors North America, Inc.
100 North Mitsubishi Motorway
Normal, Illinois 61761-8099

1.3 Operator

Mitsubishi Motors North America, Inc.
100 North Mitsubishi Motorway
Normal, Illinois 61761-8099

Eugene Schlueter
309/888-8701

1.4 Source Description

The Mitsubishi Motors North America, Inc. automobile assembly operation is located at 100 North Mitsubishi Motorway in Normal, McLean County, Illinois. The source assembles automobiles. The principal pollutant emitted is volatile organic material (VOM) from evaporation of the solvents in the coating used and other solvent uses during the assembly. In addition, the source operates bake ovens for drying the coatings.

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
ED	Electrodeposition
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
mmBtu	Million British thermal units
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_x	Nitrogen Oxides
NSPS	New Source Performance Standards
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
PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management Plan
SCR	Stone and Chip Resistant
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

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:

Engine wax application

Vehicle testing

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:

None

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)].

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
Section 7.1			
1	Prime Coat: Electrodeposition (ED) Dip Tank and 3-Stage Bake Oven Bake Oven Firing Rate (All Stages Combined): 23 mmBtu/Hr	1986	ED Afterburner on Bake Oven Only
2	Guide Coat: Robotic Spray System and 3-Stage Bake Oven Bake Oven Firing Rate (All Stages Combined): 61.64 mmBtu/Hr	1986	Wet Scrubber on Spray Booth
3	Top Coat Lines 1 and 2: Each Line has Robotic and Hand Held Spray Stations and a 3-Stage Bake Oven Bake Oven Firing Rate: (All Stages from Both Top Coat Lines and Repair Line Combined): 272.8 mmBtu/Hr	1986	Wet Scrubber on Each Spray Booth. Top Coat Afterburners Nos. 1 and 2 on Bake Ovens Afterburner Firing Rates: 10 mmBtu/Hr Each
4	Top Coat Repair Spray Booth and Bake Oven ---------- Top Coat Touch Up Spray Booth and Infrared Oven	1986	Wet Scrubber on Booth ---------- Filter on Booth
5	Plastic Parts Coating: Primer or Adhesion Promoter Spray Booth and Bake Oven followed by Color Coat and Clear Coat Spray Booths and Bake Oven Bake Oven Firing Rate: 23.3 mmBtu/Hr	1986	Wet Scrubber or Spray Booths Both Bake Ovens Vented to Plastic Parts Afterburner Afterburner Firing Rate: 3.6 mmBtu/Hr
6	Undercoat/Seal/SCR Spray Booth and Bake Oven Bake Oven Firing Rate: 3.5 mmBtu/Hr	1986	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
7	Wheelhouse Blackout (Spray) Booth	1986	None
8	Solvent Purge		None
Section 7.2			
9	Press-Weld Shop Solvents	1986	None
10	Assembly Line Solvents	1986	None
11	Cleaning Agents	1986	None
12	Cold Cleaning Degreaser	1986	None
13	Solvent Wiping	1986	None
14	Gasoline Storage Tank Nos. 3 and 4 10,000 Gallons Each	1986	Submerged Loading Pipe
15	Gasoline Storage Tanks less than 3000 gallons	1986	Submerged Loading Pipe
16	Vehicle Fueling	1986	Vapor Balance

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, NO_x and HAP emissions.

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_2, ozone, $PM_{2.5}$, PM_{10}, SO_2).

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).

An example would be the Boiler MACT (40 CFR 63 Subpart DDDDD) which was originally issued and then vacated. Since there were no actual standards to comply with under the original Boiler MACT, and that is not expected to change, when the Boiler MACT is reissued it may only be necessary to notify the Illinois EPA.

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.

5.3.6 Episode Action Plan

a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144 and is incorporated by reference into this permit.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.

c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.3.7 PM_{10} Contingency Measure Plan

Should the actual annual source-wide emissions of PM_{10} equal or exceed 15 tons and the source be located in the areas designated in and subject to 35 IAC 212.324(a)(1) or 212.423(a), then the Permittee shall prepare and submit a contingency measure plan reflecting the PM_{10} emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U. This permit may also have to be revised or reopened to address this regulation (see Condition 9.12.2).

5.4 Source-Wide Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 35 IAC Parts 218 or 219, because the source is not located in the Chicago or Metro-East metropolitan areas.

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)	2,607.10
Sulfur Dioxide (SO_2)	1.71
Particulate Matter (PM)	39.74
Nitrogen Oxides (NO_x)	143.50
HAP, not included in VOM or PM	----
Total	2,792.05

5.6.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.6.3 Other Source-Wide Production and Emission Limitations

a. The annual emissions from the source shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)	Underlying Rules
Particulate Matter	24.9	
Sulfur Dioxide	0.7	
Nitrogen Oxides	131	40 CFR 52.21
Volatile Organic Material	2,650	40 CFR 52.21
Carbon Monoxide	96.0	

The limits above are limitations established in Permit 86010040, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) with an adjustment made to the CO emissions to reflect new emission factors for fuel combustion. 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 Prevention of Significant Deterioration (PSD), 40 CFR 52.21. [T1]

b. The total heat input to the plant shall not exceed 190,000 million Btu/month.

c. 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).

d. Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. However, there are unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

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.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

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

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

5.9. Records for Other Source-Wide Emission Limitations

Records to verify the limits in Condition 5.6.3.

5.9. 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, including HAP emissions, 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

The word automobile when used in this permit also includes light duty trucks and sport utility vehicles (SUVs), which may or may not be produced at this source.

There are several types of coatings applied to automobiles. The prime coat is the initial coat applied to the body of the automobile by an electrodeposition (ED) process which takes place inside a dip tank, that is the entire vehicle is submersed in a water-based coating and an electric charge applied. The Permittee has an afterburner on the prime-coat baking oven but the coating would be in compliance with the applicable regulations even without the afterburner. The afterburner primarily reduces odor. Although generally referred to as afterburners, control devices for the above unit and other coating lines may also be called thermal oxidizers. The Permittee has obtained a construction permit to eventually replace the current recuperative type thermal oxidizers with regenerative type thermal oxidizers.

A guide coat or prime-surfacer coat is a second coat between the prime coat and top coat. There is no afterburner on the guide coat bake oven but there is a wet scrubber on the spray booth for PM removal. Some of the solvent may dissolve in the water used in the wet scrubber but the water is recycled and it is not claimed to be a VOM control device. The top coat actually consists of base coat and a clear coat, but the base coat is not baked before applying the clear coat (called liquid on liquid application). While there is only one line of automobiles through the prime coat and guide coat operations, the line divides into two for the top coat operation. Each top coat booth has a wet scrubber and the ovens are controlled by an afterburner. The top coat operations include a Touch-Up Spray Booth and Infrared Drying Oven, located in the final repair area. Small quantities of coating materials (less than 2 gallons per day) are transferred to and applied in the Touch-Up Spray Booth which is controlled by a pleated paper filter. Emissions from the Infrared Oven are uncontrolled. Emissions are quantified with the Top Coat emissions.

The plastic parts (bumpers sometimes called fascia) coating operation uses an adhesion promoter as the first coat on parts made of polypropylene. Typical coating would not adhere to the polypropylene plastic without the adhesion promoter. For fascia made from a reaction plastic a conductive primer is used. This operation also has an afterburner on the oven. The guide coat uses robotic spray applicators, the top coat uses a combination of robotic and hand-held spray applicators and the plastic parts has hand-held spray applicators.

There are other specialty coatings applied, usually between the prime coat and top coat. These include an undercoating, a seal coating, and a stone and chip resistant coating. A blackout paint for the wheel wells is applied after the topcoat. These coatings contain low amounts of VOM and since applied to a small area only a slight amount of PM is generated.

There are both state emission standards (35 IAC) and federal NSPS (40 CFR 60) for automobile coating. Each standard has a different method for measuring compliance. The state standard is in pounds of VOM emitted per gallon of coating used. The gallon is measured as if there were no water present (if water is present in the coating). Credit may be taken for control equipment, i.e., the afterburner.

Compliance with the NSPS is determined as pounds of VOM emitted per gallon of applied coating solids. When measured this way, coatings in which a high percent of the coating actually adheres to the auto body (i.e., less overspray, usually measured by a factor called transfer efficiency) may contain more VOM and still comply. Credit may also be taken for control equipment. Prime coats have low emissions standards because the solvent is primarily water and since it is applied in a dip tank the transfer efficiency is a high 90%. Compliance with the NESHAP rule (40 CFR 63) is also determined on a pounds of HAPs per gallon of applied coating solids.

The solvent purge is a process associated with the guide coat, top coat, and plastic coating lines. The same spray head is used for each color and thus when a color change is made the coating in the spray head must be purged with solvent to clean out the old color. Even if the color is not changed the spray head is purged every 10 to 15 vehicles as coating accumulates at the fine spray head discharge point and may come out as a glob if not purged. The purge solvent is sprayed into an enclosed container and then sent offsite to be distilled and returned. There is no specific emission standard for this type of process, but permit condition specifies work practices to minimize emissions.

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
1	Prime Coat: Electrodeposition (ED) Dip Tank and 3-Stage Bake Oven Bake Oven Firing Rate (All Stages Combined): 23 mmBtu/Hr	1986	ED Afterburner on Bake Oven Only
2	Guide Coat: Robotic Spray System and 3-Stage Bake Oven Bake Oven Firing Rate (All Stages Combined): 61.64 mmBtu/Hr	1986	Wet Scrubber on Spray Booth
3	Top Coat Lines 1 and 2: Each Line has Robotic and Hand Held Spray Stations and a 3-Stage Bake Oven Bake Oven Firing Rate: (All Stages from Both Top Coat Lines and Repair Line Combined): 272.8 mmBtu/Hr	1986	Wet Scrubber on Each Spray Booth. Top Coat Afterburners Nos. 1 and 2 on Bake Ovens Afterburner Firing Rates: 10 mmBtu/Hr Each
4	Top Coat Repair Spray Booth and Bake Oven ---------- Top Coat Touch Up Spray Booth and Infrared Oven	1986	Wet Scrubber on Booth ---------- Filter on Booth
5	Plastic Parts Coating: Primer or Adhesion Promoter Spray Booth and Bake Oven followed by Color Coat and Clear Coat Spray Booths and Bake Oven Bake Oven Firing Rate: 23.3 mmBtu/Hr	1986	Wet Scrubber or Spray Booths Both Bake Ovens Vented to Plastic Parts Afterburner Afterburner Firing Rate: 3.6 mmBtu/Hr
6	Undercoat/Seal/SCR Spray Booth and Bake Oven Bake Oven Firing Rate: 3.5 mmBtu/Hr	1986	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
7	Wheelhouse Blackout (Spray) Booth	1986	None
8	Solvent Purge		None

7.1.3 Applicable Provisions and Regulations

a. The "affected coating lines" for the purpose of these unit-specific conditions, are coating lines used to coat automobiles/light duty trucks/SUVs and described in Conditions 7.1.1 and 7.1.2.

b. Each affected coating line is subject to the emission limits identified in Condition 5.3.2(b).

c. The coating lines, excluding the plastic parts and wheelhouse blackout, are subject to an NSPS, 40 CFR 60 Subpart MM, for automobile and light duty truck surface coating operations. The specific standards are as follows:

i. Prime Coat: 1.33 lbs VOM/gal of applied coating solids (0.16 kg VOM/liter of applied coating solids.

ii. Guide Coat: 11.67 lbs VOM/gal of applied coating solids (1.4 kg VOM/liter of applied coating solids.

iii. Top Coat: 12.26 lb VOM/gal of applied coating solids (1.47 kg VOM/liter of applied coating solids.

Top coat repair coating must be included in the top coat calculation.

The above standards also represent BACT. However, there is an alternate standard in Attachment 2?. [T1]

d. The coating lines, excluding the plastic parts and wheelhouse blackout, are subject to 35 IAC 215.204(a)(2). These standards are measured as pounds of VOM emitted per gallon of coating excluding water, except for topcoat.

		lb/gal	kg/liter
i.	Prime Coat	1.2	0.14
ii.	Prime Surface Coat[a]	2.8	0.34
iii.	Top Coat[b]	2.8	0.34
iv.	Final Repair Coat	4.8	0.58

[a] See Compliance Procedures in Condition 7.1.12(i)(iv).

[b] See Compliance Procedures in Condition 7.1.12(j)(ii).

e. Each coating operation is subject to 35 IAC 212.321. This rule limits PM emissions and is written out in Attachment 2. For coating operations the process weight is the weight of the coating.

f. The bake ovens used on several of the coating lines identified in Condition 7.1.2 are classified as fuel combustion emission units and are subject to 35 IAC 216.121 which limits CO emissions to 200 ppm, corrected to 50 percent excess air. This applies to units with a heat input greater than 10 mmBtu/hr.

g. Emission units 5, 6 and 7 are subject to 35 IAC 215.301/302. This rule limits VOM emissions to 8 lb/hr, if the VOM is photochemically reactive pursuant to the definition in 35 IAC 211.4690, or controlled by 85% as allowed by §215.302. Since there is no control equipment in use for units 6 and 7, emissions must be below 8 lb/hr, if the solvent that vaporizes is photochemically reactive. Note that each unit identified in Condition 7.1.2 may include more than one emission unit as listed and regulated by §215.301. For instance the undercoat, seal and SCR spray booths are each a separate unit although listed together in Section 7.1.2.

h. The coating operations are subject to 40 CFR 63 Subpart IIII (§3080 though §3176 plus tables and appendix and the applicable parts of the general provisions of Subpart A), a NESHAP rule for surface coating of automobiles and light-duty trucks. Normally the plastic parts coating operation would be subject to a different NESHAP (Subpart PPPP) but a provision within subpart IIII [40 CFR 63.3082(c)] allows a source to consider all of the emission units to be regulated by Subpart IIII. The Permittee has chosen this option and thus Subpart PPPP is subsumed into Subpart IIII for determining compliance, operation of control equipment, testing, monitoring recordkeeping and reporting.

7.1.4 Non-Applicability of Regulations of Concern

a. The coating operation cited above in Condition 7.1.3(d) are not subject to 35 IAC 215.301/302 as pursuant to §215.209 no coating line subject to Section 215.204 is required to meet §215.301 or §215.302.

b. This permit is issued based on the affected prime coat dip tank and bake oven, guide coat bake oven, touch-up infrared oven, undercoat/seal coat/SCR line and associated bake oven, the wheelhouse blackout booth and solvent purge not being subject to 40 CFR Part 64, Compliance Assurance

Monitoring (CAM) for Major Stationary Sources, because the affected units do not use an add-on control device to achieve compliance with an emission limitation or standard for VOM.

c. This permit is issued based on the affected guide coat spray booth, top coat spray booths, top coat repair spray booth and top coat touch-up spray booth not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected units do not have potential pre-control device emissions of the applicable regulated air pollutant (PM) that equals or exceeds major source threshold levels.

7.1.5 Control Requirements and Work Practices

a. The wet scrubber and afterburners shall be operated so as to achieve compliance with Condition 7.1.3(c), (d) and (e) or the alternate standard in Attachment 5 for the top coat operations.

b. Real transfer efficiency, i.e. the transfer efficiency determined using the methods and procedures specified elsewhere in this permit as applied to the Permittee's operations, shall be used to comply with the above limits, provided however that the following assumptions shall be made:

   i. 90 % transfer efficiency for the prime operation if coating is applied by an electrodeposition (EDP) system; and

   ii. 76% transfer efficiency for the guide (second) coat operation if at least 95% of the coating is applied by robotic or automatic electrostatic sprays.

c. The organic material emission from the two main top coat ovens shall be controlled by afterburners, with at least 90% destruction efficiency. The top coat afterburners shall be operated year-round unless operation during only the ozone season (April 1 to October 31 of each year) is permissible within USEPA’s present or future written policy for Best Available Control Technology. In such case and if the top coat afterburners are not operated during other times, compliance determinations shall be made relying on the demonstrated performance of the afterburners when their operation was required.

d. This permit is issued based upon prime oven afterburner being operated year-round for odor control. The afterburner shall not be used for the purpose of determining compliance with the VOM limitations in Condition 7.1.3(c)(i).

e. The emissions of organic material from certain other coating operations and processes not addressed by Condition 7.1.5(b) to (d) which are also subject to BACT shall not exceed the limits specified in Attachment 6.

f. The organic material emission from the Plastic Parts Coating Ovens shall be controlled by afterburner(s) with at least 90% destruction efficiency. The afterburner(s) shall be operated year-round unless operation during only the ozone season (April 1 to October 31 of each year) is permissible within USEPA's present or future written policy for Best Available Control Technology.

g. Automobile body painting shall be scheduled to minimize color changes and associated purging of coating applicators, consistent with other constraints on scheduling.

Conditions 7.1.5(b) through (g) represent the application of BACT as required by the Prevention of Significant Deterioration regulations as previously established in Permit 86010040. [T1]

h. At all times, including periods of startup, shutdown and malfunction, the Permittee shall also, to the extent practicable, maintain and operate the automobile body coating operations, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 60.11(d)]

i. The particulate matter emissions from coating overspray shall be controlled by waterwalls (wet scrubbers), filters or other devices with at least 98% efficiency, except in the off-black and minor repair spray booth where at least 86% efficiency shall be achieved, and in the touch up and rustproofing (underfloor and engine wax coating) booth where at least 75% efficiency shall be achieved.

j. The particulate matter emissions from any production welding and grinding operations which are vented shall be controlled by fabric filter or electrostatic precipitation devices prior to discharge to either the outside or the work area air. This condition does not apply to plant maintenance operations.

k. Natural gas shall be the only fuel used in fuel combustion emission device and as supplemental fuel for the afterburners.

l. Requirements to comply with the NESHAP rule (40 CFR 63 Subpart IIII which subsumes Subpart PPPP).

    i. At all times, including periods of startup, shutdown and malfunction, the owner or operator must operate

and maintain any affected source, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.6(e)(1)]

ii. The owner or operator of an affected source must develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. [40 CFR 63.6(e)(3)]

iii. The Permittee shall follow the work practice standards of §63.3094 for automobile coating.

iv. The Permittee shall operate the control systems to meet the operating limit requirements of §63.3093 for automobile coating (which references Table 1 of Subpart IIII) in order to meet the limit in §63.3091(a) of 0.60 lb HAP/gal of coating solids deposited.

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. Annual emissions of organic material from any individual coating operation or other process operation, excluding any emissions attributable to fuel combustion, shall not exceed the amount specified in Attachment 7. [T1]

b. Hourly particulate matter emissions from any individual item of equipment or operation, excluding any emissions attributable to fuel combustion, shall not exceed the numerical limits specified by Attachment 8. [T1]

c. i. Organic material emissions in a normal working day of any individual item of equipment or operation listed in Attachment 8, excluding any emissions attributable to fuel combustion, shall not exceed the numerical limits specified in Attachment 8. For purposes of this condition a normal working day is two 8-hour shifts, producing a maximum of 997 automobiles. Compliance with limits may be determined from a combination of daily production data and monthly material usage data.

ii. A. The hourly input capacity of fuel burners for any individual item of equipment or operation listed in Attachment 8 shall not exceed the numerical limit in Attachment 8.

B. The total hourly heat input capacity of fuel burners for equipment or operations not listed in Attachment 8, e.g., boilers, space heaters, door heaters, etc. shall not exceed 173 million Btu/hour.

d. i. VOM content and emissions of VOM from the primary adhesion promoter coating booths and touchup booth combined shall not exceed the following:

VOM Content (Lb/Gal)	VOM Emissions (Ton/Mo)	VOM Emissions (Ton/Yr)
6.5 (Primary Booth) 7.0 (Touchup Booth)	10.6	105.6

ii. VOM emissions from the adhesion promoter and plastic parts primer combined shall not exceed 128.0 ton/yr, and primer by itself shall not exceed 115.0 ton/yr.

e. i. If VOM emissions from plastic parts primer and adhesion promoter combined were under 110 ton/yr the previous calendar year, compliance with annual emissions limit in Condition 7.1.6(d)(ii) shall be determined from a running total of four quarters of data.

ii. If VOM emissions from plastic parts primer and adhesion promoter combined were over 110 ton/yr the previous calendar year, compliance with annual emissions limit in Condition 7.1.6(d)(ii) shall be determined from a running total of 12 months of data.

f. i. VOM content and emissions of VOM from the wheelhouse black booth shall not exceed the following:

VOM Content (Lb/Gal)	VOM Emissions (Lb/Mo)	VOM Emissions (Ton/Yr)
0.7	700	3.5

ii. VOM content of the blackout booth coating excluding water shall not exceed 2.8 lb/gal pursuant to 35 IAC 214.204(a)(2).

iii. Emissions of particulate matter (PM) from the blackout booth shall not exceed 0.55 lb/hr and 1.2 ton/yr.

iv. In Attachment 7 emissions from the blackout booth are included under top coat.

The above limitations were established in Permit 86010040, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source of PM. [T1]

7.1.7 Testing Requirements

a. Each container of coating received from the supplier shall include an analysis of VOM content determined using USEPA method 24 or 24A or from formulation information.

b. Although the new afterburner approved for installation in Construction Permit 05120051 was not installed as it was not necessary to achieve compliance with these NESHAP coating rules, compliance testing the new afterburners must be completed within 90 days of startup and shakedown if installed at some time in the future. Only the capture and destruction efficiency of the new afterburner need to be performed. The procedures and explanations of testing procedures are in 40 CFR 63.3151 and 63.3161 in Subpart IIII.

c. All of these tests must use the test methods specified and collect the information necessary to demonstrate compliance with Subparts IIII and the requirements for performance testing under §63.7, §63.3164-63.3167.

7.1.8 Monitoring Requirements

a. Each of the afterburners for which the afterburner is necessary to comply with the NSPS shall be equipped with a monitor to measure the combustion chamber temperature (40 CFR 60.394).

b. Although compliance may be demonstrated with either of the afterburners (new regenerative type when installed or existing recuperative, also called oxidizers by the NESHAP rules), both are classified as thermal oxidizers and the same parameter is monitored for each although the compliance temperature for each oxidizer may be different.

i. The average combustion temperature necessary to achieve compliance is determined during the performance test using a 3-hour period as established according to §63.3167(a). There must be reading at least every 15 minutes but it can be more frequent and then averaged for the readings during that 3-hour period. See Also Table 1 in Subpart IIII.

ii. The Permittee must also monitor variables for the emissions capture systems for each afterburner. Table 1 in Subpart IIII specifies variables for systems that are permanent total enclosures (PTEs) and those that are not PTEs. The Permittee must follow the appropriate ones in Table 1.

c. Subpart IIII has a Section titled: How do I demonstrate continuous compliance with the emissions limitations? [§63.3163], for which the calculation procedures in §63.3161 are performed on a monthly basis and other requirements in Subpart IIII are met. The Permittee must follow the requirements of this continuous compliance demonstration.

Note that some of the CAM (see below), NSPS and NESHAP requirements may be identical and meeting the most stringent will satisfy all three, i.e. it is not necessary to have three records of the afterburner combustion chamber temperature.

d. Each of the wet scrubbers on the fascia booth, guide coat booth, top coat booths and repair booth shall be equipped with devices for measuring normal design parameters and overload conditions of the scrubber pumps and an alarm system that alerts an operator. In addition the scrubber fluid flow rate shall be verified on an annual basis and the pumps verified to be operating within design performance standards.

e. Compliance Assurance Monitoring (CAM) Requirements

The affected top coat and plastic parts afterburners are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3, Table 3A and 3B, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(a) and (b)]

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 affected coating operation to demonstrate compliance with Conditions 5.6.1, 7.1.3, and 7.1.5 through 7.1.8 pursuant to Section 39.5(7)(b) of the Act:

a. Afterburner combustion chamber temperature (a continuous record of when operating normally, a log of when vehicles

not being produced, and a log of when combustion chamber was operating below specified temperature and vehicles were being produced). The permanent record may be three hour block average temperatures as allowed by the NESHAP.

b. Vehicles produced.

c. VOM content of each container of coating received and solids content of top coats.

d. The photochemical nature of solvents in the coatings used on emission units 5, 6 and 7 if the VOM emission rate is over 8 lb/hour and the units does not have control equipment that can reduce emissions by 85%.

e. Records of all emission tests performed including capture efficiency, destruction efficiency and transfer efficiency tests.

f. Any record required to demonstrate compliance with Attachments 5 through 8.

g. A monthly record of demonstration of compliance with the NSPS, Condition 7.1.3(c).

h. VOM, PM, NO_x and SO_2 emissions (lb or ton/mo).

i. The records required by the NESHAP and the form in which they are to be kept are described in §63.3130-3131 in Subpart IIII.

j. Records for Compliance Assurance Monitoring (CAM) Requirements

The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements in Condition 7.1.8(a), as required by 40 CFR 64.9(b)(1).

k. Monitoring records for wet scrubbers. This includes logs of response to alarms indicating pump overload conditions or not operating within the normal design parameters and annual verifications of normal operation.

7.1.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of an affected coating operation 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 Condition 7.1.6, (including the attachments specified in Condition 7.1.6), within 30 days of such occurrence.

ii. Operation of the affected coating operations in excess of the limits specified in Conditions 7.1.3(b) through (g), within 30 days of such occurrence.

iii. Not meeting the BACT or other requirements specified in Condition 7.1.5.

b. Reporting of Compliance Assurance Monitoring (CAM)

The Permittee shall submit monitoring reports to the Illinois EPA in accordance with Condition 8.6.1 and shall include, at a minimum, the information required under Condition 8.6.1 and the following information:

i. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken [40 CFR 64.6(c)(3) and 64.9(a)(2)(i)]; and

ii. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks [40 CFR 64.6(c)(3) and 64.9(a)(2)(ii)].

c. The reports that must be submitted for the NESHAP are listed in §63.3120 in Subpart IIII.

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:

The actual coatings may be changed (i.e., new colors) provided that emissions continue to comply with Condition 7.1.3, 7.1.5 and 7.1.6.

7.1.12 Compliance Procedures

a. Compliance with Condition 7.1.3(c) and (d)are addressed by the requirements of Condition 7.1.5(b), (c), (e), (g) and (h), the testing requirements in Condition 7.1.7(a), the

continuous monitoring requirements in Condition 7.1.8(a)-(c), the records required in Condition 7.1.9 and the reports required in Condition 7.1.10.

b. Compliance with Condition 7.1.3(e) is addressed by the intermittent and continuous monitoring requirements in Condition 7.1.8(d), the records required in Condition 7.1.9 and the reports required in Condition 7.1.10.

c. Compliance with Condition 7.1.3(f) is addressed by the emission calculations using the emission factor in USEPA's Compilation of Air Pollutant Emission Factors, AP-42, for uncontrolled CO emissions from a gas-fired fuel combustion unit and the records and reports required in Conditions 7.1.9 and 7.1.10.

d. Compliance with Condition 7.1.3(g) for Emission Unit 5 is addressed by the requirements of Condition 7.1.5(f), the emission limit in condition 7.1.6(d) and (e), the CAM monitoring requirements in Condition 7.1.8 (e), the records required in Condition 7.1.9 and the reports required in Condition 7.1.10.

e. Compliance with Condition 7.1.3(g) for Emission Units 6 and 7 is addressed by the emission limit in condition 7.1.6(f), the records required in Condition 7.1.9 and the reports required in Condition 7.1.10.

f. Compliance with Condition 7.1.3(h) is addressed by the requirements of Condition 7.1.5(b), (c), (h) and (l), the testing requirements in Condition 7.1.7(b) - (e), the continuous monitoring requirements in Condition 7.1.8(b)-(c), the records required in Condition 7.1.9 and the reports required in Condition 7.1.10.

g. Compliance with Condition 7.1.5(k) and 7.1.6 are addressed by the records and reports required in Conditions 7.1.9 and 7.1.10.

h. Prime Coat (Electrodeposition) Emission Calculations

   i. Emissions VOM (lb/mo) = Resin usage (gal/mo) times VOM content of resin (lb VOM/gal) + Paste usage (gal/mo) times VOM content of paste (lb VOM/gal)

   ii. Emission rate[a] (lb/gal) = (i) above divided by of applied coating [Resin usage (gal/mo) solids) times (% volume solids/100) + Paste usage (gal/mo) times (% volume solids/100)]

   [a] This calculation may be done in metric units.

Note that no credit for an emission reduction is given for the afterburner on the base oven of the prime coat line.

i. Guide Coat Emission Calculations

i. Emissions VOM (lb/mo) = $\sum_{i=1}^{n}$ [Guide coat usage (gal/mo) times VOM content (lb/gal)] + [Diluent solvent usage (gal/mo) times diluent density (lb/gal)]

Where n = Number of different coatings

ii. Applied coating solids = $\sum_{i=1}^{n}$ [Guide coat usage (gal/mo) times (volume % solids/100)] times transfer efficiency (%/100)

iii. Emission rate[a] (lb/gal) = (i) divided by (ii) of applied coating above solids)

[a] This calculation may be done in metric units

iv. The USEPA's guidance for automobile coating lines, which underlies 35 IAC 215.204(a), established an emission standard for prime surfacer coat lines of 2.8 lb VOM/gal based on achievement of a transfer efficiency of 30 percent. This USEPA guidance further stated that prime surfacer containing more than 2.8 lb VOM/gal may be considered to be in compliance if the levels of transfer efficiency and add-on control, if any, are such that the result is at least equivalent to use of a coating containing 2.8 lb VOM/gal applied at 30 percent transfer efficiency, i.e., 15.1 lb VOM/gal applied coating solids. This equivalent standard provides for appropriate consideration of the VOM content of the coating, the transfer efficiency with which it is applied, and the emission reduction provided by any add-on control equipment.

The standards set by the federal NSPS for automobile coating operations are also expressed in terms of lb VOM/gal applied coating solids (refer to Condition 7.1.3(c)). The NSPS standard for guide coat (prime surfacer coat) operations, 11.67 lb VOM/gal applied solids, is significantly more stringent than the applicable state standard for prime surfacer coat (guide coat), when appropriately expressed in terms of applied solids. Accordingly, compliance with the NSPS limit using "real transfer efficiency", as required by Condition 7.1.5(b), rather than the

higher table values of transfer efficiency as given in 40 CFR 60.393(c)(1)(i)(C) is considered to be sufficient to demonstrate compliance with the state standard for prime surfacer coat.

The USEPA guidance was a memorandum by Richard G. Rhoads of the Office of Air Quality Planning and Standard Air Quality Planning and Standard dated October 6, 1978 and considered to be a supplement to the original automobile coating control technology guideline. This was further supplemented in 1987 in a document on issues related to VOC regulation cut points, deficiencies and deviations, frequently referred to as the Blue Book.

j. Top Coat Emission Calculations

i. This is a complex calculation generally done by spread sheet values and computer calculations involving the following variables:

Coating usage by color percent volume solids and VOM content, diluent solvent usage and density, repair coating usage, percent volume solids and VOM content, transfer efficiency for each type of base coat, clear coat and repair coat, color change rate (%), percent of VOM carried through to the bake oven (assumed to be 20%) and bake oven afterburner destruction efficiency.

ii. The USEPA’s guidance for automobile coating lines, which underlies 35 IAC 215.204(a), established an emission standard for topcoat lines of 2.8 lb VOM/gal based on achievement of a transfer efficiency of 30 percent. This USEPA guidance further stated that topcoat containing more than 2.8 lb VOM/gal may be considered to be in compliance if the levels of transfer efficiency and add-on control, if any, are such that the result is at least equivalent to use of a coating containing 2.8 lb VOM/gal applied at 30 percent transfer efficiency, i.e., 15.1 lb VOM/gal applied coating solids. This equivalent standard provides for appropriate consideration of the VOM content of the coating, the transfer efficiency with which it is applied, and the emission reduction provided by any add-on control equipment.

The standards set by the federal NSPS for automobile coating operations are also expressed in terms of lb VOM/gal applied coating solids (refer to Condition 7.1.3(c)). The NSPS standard for topcoat operations, 12.26 lb VOM/gal applied solids, is significantly more stringent than the applicable state standard for topcoat, when appropriately expressed in terms of

applied solids. Accordingly, compliance with the NSPS limit using “real transfer efficiency”, as required by Condition 7.1.5(b), rather than the higher table values of transfer efficiency as given in 40 CFR 60.393(c)(1)(i)(C) is considered to be sufficient to demonstrate compliance with the state standard for topcoat.

The USEPA guidance was a memorandum by Richard G. Rhoads of the Office of Air Quality Planning and Standard Air Quality Planning and Standard dated October 6, 1978 and considered to be a supplement to the original automobile coating control technology guideline. This was further supplemented in 1987 in a document on issues related to VOC regulation cut points, deficiencies and deviations, frequently referred to as the Blue Book.

k. Plastic Parts Coating Emission Calculations

VOM Emissions (lb/mo) = Coating usage (gal/mo) times VOM content (lb/gal) times (1-[capture efficiency (%/100)] times [destruction efficiency (%/100)]

l. Other Uncontrolled Coatings

VOM Emissions (lb/mo) = Coating usage (gal/mo) times VOM content (lb/gal)

m. Loss from Solvent Purge

Material balance calculation

n. Emission Calculation for the Bake Ovens

i. Emission factors for the affected bake ovens when fired by natural gas:

Pollutant	Emission Factors (lb/mmscf)
VOM	5.5
PM	7.6
SO_2	0.6
NO_x	100
CO	84

The emission factors (lb/mmscf) are for Natural Gas-Fired Small Boilers (<100 mmBtu/hr Heat Input) from AP-42 Section 1.4 (dated 3/98).

ii. Emission formula for the affected boiler when fired by natural gas:

(Bake Oven Emissions, lb) = (The Appropriate Emission Factor, lb/mmscf) x (Natural Gas Usage, mmscf)

7.2 Other Process Emission Units

7.2.1 Description

This section covers emission units other than coating and fuel combustion. The emissions here are also primarily VOM as various solvents are used throughout the assembly process. Some solvents are for cleaning or wiping the automobile; another example is that a sealant used to install the front and back windows contains a solvent

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
9	Press-Weld Shop Solvents	1986	None
10	Assembly Line Solvents	1986	None
11	Cleaning Agents	1986	None
12	Cold Cleaning Degreaser	1986	None
13	Solvent Wiping	1986	None
14	Gasoline Storage Tank Nos. 3 and 4 10,000 Gallons Each	1986	Submerged Loading Pipe
15	Gasoline Storage Tanks less than 3000 gallons	1986	Submerged Loading Pipe
16	Vehicle Fueling	1986	Vapor Balance or Onboard Refueling Vapor Recovery

7.2.3 Applicable Provisions and Regulations

a. The “affected other emission unit” for the purpose of these unit-specific conditions, is an operation employed during assembly of an automobile and described in Conditions 7.2.1 and 7.2.2.

b. Emission units 9 to 13 are subject to 35 IAC 215.301. This rule limits VOM emissions to 8 lb/hr, if the VOM is photochemically reactive pursuant to the definition in 35 IAC 211.4690, or controlled by 85% as allowed by § 215.302. Since there is no control equipment in use, emissions must be below 8 lb/hr, if the material is photochemically reactive. Note that each unit identified in Condition 7.2.2 may include more than one emission unit as listed and regulated by § 215.301. Assembly solvent used for one operation along the assembly line would be one unit and another solvent used somewhere else along the assembly line would be another unit.

c. The cold cleaning degreaser is subject to 35 IAC 215.182. This rule states that no person shall operate a cold cleaning degreaser unless:

i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights, or a powered system if:

A. The solvent vapor pressure is greater than 15 mmHg or 0.3 psi measured at 100°F;

B. The solvent is agitated; or

C. The solvent is heated above ambient room temperature.

ii. 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:

A. The solvent vapor pressure is less than 32 mmHg or 0.6 psi measured at 100°F; or

B. An internal drainage facility cannot be fitted into the cleaning system, in which case the drainage facility may be external.

iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 32 mmHg or 0.6 psi measured at 100°F or if the solvent is heated above 120°F or its boiling point:

A. A freeboard height of 7/10 of the inside width of the tank or 36 in, whichever is less; or

B. Any other equipment of system of equivalent emission control as approved by the Illinois EPA. Such a system may include a water cover, refrigerated chiller or carbon adsorber.

iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and

v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray. [35 IAC 215.182(b)]

d. An “affected tank”, for the purpose of these unit-specific conditions, is a storage tank that is subject to 35 IAC

215.122(b). The affected gasoline storage tank is subject to the requirements of 35 IAC 215.122(b) because the tank has a capacity greater than 250 gallons and is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected units do not use an add-on control device to achieve compliance with an emission limitation or standard, uses a passive control measure, such as a submerged loading pipe, that is not considered a control device because it acts to prevent the release of pollutants, or uses a passive control measure, such as low vapor pressure solvents, that is not considered a control device because it acts to prevent the pollutants from forming.

b. This permit is issued based upon the cold cleaning degreaser not being subject to 40 CFR 63 Subpart T because the degreaser does not use halogenated solvents. See Condition 7.2.5(d) which prohibits their use.

7.2.5 Control Requirements and Work Practices

a. i. The organic material emissions form the gasoline storage tanks, including any tanks classified as insignificant emission units, and vehicle fueling shall be controlled by use of “Stage 1” and “Stage 2” vapor balance/transfer systems.

ii. As an alternative to a “Stage II” vapor balance/transfer system, the organic material emission from vehicle fueling may be controlled by Onboard Refueling Vapor Recovery (ORVR) system installed on each new vehicle.

Condition 7.2.5(a) represents the application of BACT as required by the PSD regulations (40 CFR 52.21) as set by Conditions in Permit 86010040.

b. Each affected gasoline storage tank shall be equipped and operated with a permanent submerged loading pipe, pursuant to 35 IAC 215.122(b). (The Illinois EPA has not approved use of other equivalent equipment in lieu of a permanent submerged loading pipe.)

c. No person shall operate a cold cleaning degreaser unless:

i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than

20 percent of the waste solvent (by weight) is allowed to evaporate into the atmosphere;

ii. The cover of the degreaser is closed when parts are not being handled; and

iii. Parts are drained until dripping ceases.

d. The solvent used in the cold cleaning degreaser shall not be a halogenated solvent.

7.2.6 Production and Emission Limitations

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

The limits for all processes at the assembly including those in Condition 7.2.2, were referenced in Section 7.1 of this permit and are listed in Attachments 5, 6, 7 and 8. These conditions were established in Permit 86010040.

7.2.7 Testing Requirements

Testing requirements are not set for the affected other emission units. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.2.8 Monitoring and Inspection Requirements

The gasoline tanks shall be inspected annually to verify that the submerged loading pipe is in place and functioning properly.

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 affected other emission units to demonstrate compliance with Condition 5.6.1, 7.2.3, 7.2.5 and 7.2.8, pursuant to Section 39.5(7)(b) of the Act:

a. Design information for the tank showing the presence of a permanent submerged loading pipe;

b. Inspection, maintenance and repair records for the tank, as related to the presence in good condition, repair or replacement of the submerged loading pipe;

c. Usage of solvents on each process listed in Condition 7.2.2 or throughput of gasoline for the storage tank or vehicle fueling. Solvents will be assumed to be 100% VOM unless a record indicating otherwise is kept. The HAP content of the material must also be kept (lb or gal/mo and year);

d. If credit is claimed for materials returned for recycling, then records of the usage and VOM content of the recycled materials shall be kept;

e. VOM and HAP emissions from each emission unit. If the unit is subject to Condition 7.2.3(b), the material is photochemically reactive, and the emission rate exceeds 8 lb/hr then any records that indicate the unit consisted of more than one operation, each of which could be claimed as a unit, shall be kept (lb or ton/mo and year); and

f. A record showing that the solvent used in the cold cleaning degreaser is not a halogenated solvent.

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 other emission units 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 other emission units in excess of the limits specified in Condition 7.2.6, as further delineated in Attachments 5-8, within 30 days of such occurrence.

ii. Operation of the affected other emission units in excess of the limits specified in Condition 7.2.3(b), within 30 days of such occurrence.

iii. Use of a halogenated solvent in the degreaser or not meeting the requirements of Condition 7.2.3(d).

iv. Loading gasoline into one of the tanks when the submerged loading pipe was missing or not in a properly functioning mode.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected solvent use processes 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:

The solvents or cleaning agents used in equipment listed in Condition 7.2.2 may be changed provided the unit continues to

comply with Conditions 7.2.3(b), 7.2.5 and 7.2.6 (Attachments 5 through 8).

7.2.12 Compliance Procedures

a. Compliance with Condition 7.2.3(b) is addressed by the records and reports required in Conditions 7.2.9(e) and 7.2.10(a)(i and ii).

b. Compliance with Condition 7.2.3(c) is addressed by the requirements of Condition 7.2.5(c) and the records and reports required in Conditions 7.2.9(c) through (f) and 7.2.10(a)(iii).

c. Compliance with Condition 7.2.3(d) is addressed by the requirements of Condition 7.2.5(a) and (b), the inspection g requirements in Condition 7.2.8, the records required in Condition 7.2.9(a) and (b), and the reports required in Condition 7.2.10(a)(iv).

d. For all emission units except the gasoline tank and vehicle fueling, all solvent used, less any amount recycled, will be assumed to be emitted.

f. Emissions from the gasoline storage tank shall be calculated using AP-42 emission factors or the USEPA’S TANKS program.

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 _____Error! Bookmark not defined. (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]:

Monitoring Period	Report Due Date
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
2009 Mall Street
Collinsville, Illinois 62234

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 statement 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):

	Metric	English
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):

	Metric	English
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
Mg/hr	kg/hr	T/hr	lb/hr
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):

	Metric	English
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):

	Metric	English
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		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
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

Table 3A. PSEU Designation:	Top Coat Bake Ovens (One on each top coating line)
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators:	#1: Combustion Chamber Temperature	#2: Capture Efficiency Variable
GENERAL CRITERIA		
THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Temperature sensor with the combustion chamber	?
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	>1400°F	?
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	System shutdown if temperature below 1310°F	?
PERFORMANCE CRITERIA		
THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Manufacturer testing and specifications	?
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	?	?
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Dual temperature probes, digital recorder calibrated annually	?
THE MONITORING FREQUENCY:	Continuous	?
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Digital format on computer	?
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Recorded every 0.005 seconds and then 3-hour block average. Only the block average is permanently recorded.	?

Table 3B. PSEU Designation:	Plastic Parts Coating Bake Oven
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators:	#1: Combustion Chamber Temperature	#2: Capture Efficiency Variable
GENERAL CRITERIA		
THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Temperature sensor with the combustion chamber	?
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	>1200^{o}F	?
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	System shutdown if temperature below 1050^{o}F	?
PERFORMANCE CRITERIA		
THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Manufacturer testing and specifications	?
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	?	?
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	Dual temperature probes, digital recorder calibrated annually	?
THE MONITORING FREQUENCY:	Continuous	?
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Digital format on computer	?
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	Recorded every 0.005 seconds and then 3-hour block average. Only the block average is permanently recorded.	?

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. 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

Guidance On Renewing A CAAPP Permit:

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

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
www.epa.state.il.us/air/permits/197-fee.pdf

Attachment 5 Best Available Control Technology for Topcoat Operation

ALTERNATIVE OPERATING STANDARDS

Parameter	Top
Average Solids Content of All Coating (Volume %, Less Water)	Solid Color 51% Base Coat 42% Clear Coat 54%
Overall Actual Transfer	60%
Afterburner Destruction Efficiency (%)	95%

Note: The requirement for operation of afterburners from November 1 of one year to March 31 of the next year to meet the top coat standard is addressed by Condition 7.1.5(c)?.

Attachment 6 Best Available Control Technology for Volatile Organic Material (VOM) for Operations Not Covered by Condition 7.1.5(b) to (d)?

Area/Operation	Coating Quality (kg VOM/1 ctg)	Emission Other
Body Paint Shop:		
Seal/Undercoat/Stoneguard	0.067	
Assembly Line:		
Miscellaneous Coatings[5]	-----	0.06 lb/Vehicle
Check and Repair:		
Touch Up Coating	0.58[6]	
Under Floor Rustproofing	0.37	-----
Gasoline Tank(s)	-----	[1]
Vehicle Fueling	-----	[2]
Plastic Parts Paint Shop:		
Primer	0.63[3]	
Color Coat	0.58[3]	
Clear Coat	0.53[3]	
Solvent Purge and Clean-Up:		1.8 lb/Vehicle[4]

Notes:

[1] Control by “Stage 1 Vapor Balance System.

[2] Control by “Stage 2 Vapor Balance System.

[3] Limits are uncontrolled emission; oven exhausts of the plastic parts shop must also be controlled by an afterburner, see Condition 7.1.5(f).

[4] Solvent purge and clean-up covers use of solvent or VOM containing material for nonproduction purposes, e.g., purging of applicators, cleaning of applicators, cleanup of spray booths, in the body paint shop and plastic parts paint shop. It does not cover wiping or cleaning of automobile bodies or parts prior to coating. Solvent purge and cleanup must also be controlled by the measures specified in Conditions 7.1.5(c).

[5] Miscellaneous coatings include all coatings, adhesives, primers, etc., applied during automobile assembly, other than materials associated with installation of glass and solvents used for wiping automobile surfaces, e.g. wiping prior to application of a body side molding adhesive.

[6] Limit applies to touch-up coatings applied to assembled vehicles to repair damage during assembly, which coatings are not included in the demonstrations of compliance for the automobile body top coat operation.

Attachment 7 Annual Volatile Organic Material Limits for Coating and Process Operations (Ton/Year)

Press-Weld Shop:	
Misc. Coatings/Solvent	40.0
Body Paint Shop:	
Prime Coat	104.0
Undercoat/Seal/SCR	108.0
Guide (Second) Coat	450.0
Solvent Wiping 43.0	
Top Coat, Including Touch Up and Blackout	897.9
Total	1,602.9
Assembly Line:	
Glass Installation	18.7
Wiping Solvent	11.8
Other	7.3
Total	37.8
Check and Fueling	
Underfloor Coating	153
Engine Wax	1.9
Gasoline Tank(s) & Vehicle Fueling	4.6
Transit Wax	0.1
Total	159.6
Plastic Parts Paint Shop:	
Primer	115.0
Adhesion Promoter	105.6
Primer and Adhesion Promoter Combined	128.0
Color and Clear Coat	281.0
Total	409.0
Solvent Purge and Clean Up:	
Purge Solvent	196.6
Cold Cleaner	3.2
Other Solvent Use	0.1
Cleaning Agents	89.4
Total	289.3
Grand Total:	2,538.6

Attachment 8 Limitations for Equipment and Operations

Area/Operation or Process Equipment	Particulate Matter Emissions[3] (Lb/Hr)	Volatile Organic Material Emissions (Lb/Day)	Total Heat Input (mmBtu/Hr)
Press-Weld Shop:			
Misc. Coatings/Solvent	Neg.[1]	340	---[2]
Arc Welders	1.35	---	---
Grinding	1.60	---	---
Body Paint Shop:			
Prime	Neg.	860[4]	23.0
Undercoat/Seal/SCR	Neg.	900	3.5
Guide (Second) Coat	1.00	3,730	61.6
Solvent Wiping	----	360	----
Top Coat and Touch Up	3.37	8,200[4]	175.4
Wet Sand/Dry	Neg.	---	1.5
Total		14,630	
Assembly Line:			
Glass Installation	---	155	----
Wiping Solvent	---	100	----
Other(6)	Neg.	60	----
Total		315	
Check & Fueling Area:			
Touch Up Coating[7]	---	---	4.1
Vehicle Fueling	---	12	----
Underfloor Rustproof	Neg.	1,270	----
Engine Wax	0.06	70	----
Transit Wax	Neg.	Neg	----
Total		1,352	
Plastic Parts Paint Shop:			
Primer	0.51	1,050[4]	[5]
Color/Clear Coat	1.75	2,565[4]	[5]
Total		3,615	
Solvent Purge and Clean Up:			
Purge Solvent	---	1,500[8]	----
Cold Cleaner	---	535 lb/month[8,9]	----
Other Solvent Use	---	Neg.[8]	----
Cleaning Agents	--	3438 lb/week	----

Attachment 8 - Notes:

(1) “Neg.:” designate negligible emissions, that is less than 100 lbs/year

(2) “_” designates limit not applicable as relevant type of operation not present.

(3) Individual emission sources within the operation must also comply with 35 IAC 212.321.

(4) Emissions prior to control equipment.

(5) Total heat input to the Plastic Parts Shop is limited to 21.2 million Btu/hr.

(6) Other includes all coatings, adhesives, primers, etc., other than materials associated with installation of glass and solvents used for wiping automobile surfaces, e.g. wiping prior to application of a bodyside molding adhesive.

(7) Limits apply to touch-up coatings applied to assembled vehicles to repair damage during assembly, which coatings are not included as part of the automobile body topcoat operation.

(8) Emissions after control measures.

(9) Compliance determined annually.

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