FINAL DRAFT/PROPOSED CAAPP PERMIT
The Swan Corporation
I.D. No.: 121422ABP
Application No.: 99010001
January 9, 2003

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

The Swan Corporation
Attn: Kevin Kuknke, Technical and Facilities Manager
200 Swan Avenue
Centralia, Illinois 62801

Application No.: 99010001 I.D. No.: 121422ABP
Applicant's Designation: Date Received: January 4, 1999
Operation of: Compression Molded Fiberglass
Date Issued: TO BE DETERMINED Expiration Date[2]: DATE
Source Location: 200 Swan Avenue, Centralia, Marion County
Responsible Official: Kevin F. Kuknke, Technical and Facilities Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a compression molded fiberglass plant, 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 David Hulskotter at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DWH:jar

cc: Illinois EPA, FOS, Region 3

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

The Swan Corporation
200 Swan Avenue
Centralia, Illinois 62801
618/532-5673

I.D. No.: 121422ABP
Standard Industrial Classification: 3999, Miscellaneous Manufacturing Industries

1.2 Owner/Parent Company

The Swan Corporation
One City Centre, Suite 2300
St. Louis, Missouri 63101

1.3 Operator

The Swan Corporation
200 Swan Avenue
Centralia, Illinois 62801

Edward F. Paschal, Mr.
314-382-5321

1.4 General Source Description

The Swan Corporation produces wet mold compounds and base compounds for thick and bulk molding in the blending process. Fiberglass is mixed together with the mold compounds. Then the compounds are added to the compression mold. The compounds are forced uniformly throughout the mold by the pressure exerted by the press. The compounds polymerizes because of the resin mixture, heat and pressure. Fiberglass parts are produced from this process. Fiberglass bath tub surrounds, sinks and counter tops are some of the items produced.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
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
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
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
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
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 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:

Bulk Used Hydraulic Oil Storage Tank(s)

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:

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

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

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 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 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. 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.

3.2.3 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, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

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
EU1A	4 Unsaturated Polyester Resin Storage Tanks	1984	None
EU1B	2 Polystyrene Resin Storage Tanks	1984	None
EU2	Resin Blending	1985	Torit Dust Collector and Carbon Adsorber
EU3	Thick Molding Compound	1979	Particulate Filter and Activated Carbon Exhaust System
EU4	Bulk Molding Compound	1989	Particulate Filter and Activated Carbon System
EU5	Compression Molding	1965	None
EU6	Dust Blow-Off Booth	1997	None
EU7	Paint Booth and Drying Oven	1990	Water Curtain
EU8	Flat Goods Sanding, Small Sander	1996	Dust Collector DFT2-8
EU9	Flat Goods Sanding, Large Sander	1996	Dust Collector 2OF-12
EU10	Beam Panel Saw	1990	Dust Collector DFT-16
EU11	Fabrication Shop	1996	Dust Collector
EU12	2 Boilers	1984	None
EU13	Chip Grinder	1996	Dust Collector DFT2-12
EU14	Touch Up Booth	1997	None
EU15	Fabrication Shop	1999	Dust Collector
EU16	Methyl Ethyl Ketone Storage Tank	1987	None
EU17	2 n-Butyl Acetate Storage Tanks	1987	None
EU18	Used Methyl Ethyl Ketone Storage Tank	1998	None
EU19	Portable Mix Vessel Cleaning	1990	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 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.

   Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. 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, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 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.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [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 Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC 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 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address

either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, 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.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major

Stationary Sources, for reasons stated in the unit specific conditions of Section 7.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 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 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	158.57
Sulfur Dioxide (SO_2)	0.02
Particulate Matter (PM)	3.69
Nitrogen Oxides (NO_x)	2.93
HAP, not included in VOM or PM	----
Total	165.21

5.5.2 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.

5.5.3 Other Source-Wide Emission Limitations

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, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit, including HAP emissions.

5.6.2 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.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source 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.

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of this permit and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Resin Storage Tanks

7.1.1 Description

6,000 gallon fixed roof storage tanks are storing liquid styrene resins.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Tank Capacity
EU1A	4 Unsaturated Polyester Resin Storage Tanks	6,000 Gallons
EU1B	2 Polystyrene Resin Storage Tanks	6,000 Gallons

7.1.3 Applicability Provisions and Applicable Regulations

a. The “affected tanks” for the purpose of these unit-specific conditions, are the tanks listed in Condition 7.1.2.

b. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or submerged fill, unless such tank is a pressure tank or is fitted with a recovery system. [35 IAC 215.122] Exception: If no odor nuisance exists these limitations shall only apply to the loading of volatile organic liquid with vapor pressure of 2.5 psia or greater at 70°F.

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected tanks not being subject to the New Source Performance Standards (NSPS) for Standard of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR Part 60, Subpart Kb, because the affected tanks will each have storage capacities of less than 40 m^3 (approximately 10,596 gallons).

b. The requirements of 35 IAC 215.121 do not apply because each affected tank is less than 151 cubic meters (40,000 gallons).

c. This permit is issued based on the affected tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Control Requirements

At all times, the Permittee shall, to the extent practicable, maintain and operate the affected tanks, in a manner consistent with good air pollution control practice for minimizing emissions.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected tanks are subject to the following:

N/A

7.1.7 Testing Requirements

N/A

7.1.8 Monitoring Requirements

N/A

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tanks to demonstrate compliance, pursuant to Section 39.5(7)(b) of the Act:

a. The material stored and throughput of the affected tanks in gal/yr;

b. The annual VOM emissions from each affected tank; and

c. The vapor pressures of the materials being stored.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected tanks 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.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.1.12 Compliance Procedures

For the purpose of estimating VOM emissions from the affected tank, the current version of the TANKS program is acceptable.

7.2 Polyester Resin Molding

7.2.1 Description

Resin and powdered chemicals are blended in the blenders. The base compound created in blending and stranded fiberglass are mixed and the result is the thick molding compound. The base compound created in the blending and chopped fiberglass are mixed and the result is the bulk molding compound.

A measured amount of the bulk molding compound or thick molding compound are added to the press/mold. The compound is forced uniformly throughout the mold by the pressure exerted by the press. The compound polymerizes because of the resin mixture, heat and pressure. Fiberglass parts are produced from this process. Also colored resins are produced in thin molded sheets.

Carbon adsorbers are being operated for odor removal capabilities and emission removal credit is not being claimed for the carbon adsorbers.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EU2	Resin Blending	Torit Dust Collector and Carbon Adsorber
EU3	Thick Molding Compound	Particulate Filter and Activated Carbon Exhaust System
EU4	Bulk Molding Compound	Particulate Filter and Activated Carbon Exhaust System
EU5	Compression Molding	None

7.2.3 Applicability Provisions and Applicable Regulations

a. The “affected emission units” for the purpose of these unit-specific conditions are the emission units listed in Condition 7.2.2.

b. The Permittee shall not cause or allow the discharge of more than 8 pounds per hour of organic material into the atmosphere from an affected emission unit

pursuant to 35 IAC 215.301. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

c. Affected emission units EU2, EU3, and EU4 are subject to 35 IAC 212.321 which provides that:

> No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any 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.
>
> The allowable particulate matter emission limits may be calculated based upon the following equation:
>
> $$E = A\ (P)^B$$
>
> Where:
>
> P = Process weight rate; and
> E = Allowable emission rate: and
>
> Up to process weight rate of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

d. Affected emission unit EU5 is subject to 35 IAC 212.322 which provides that:

> No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit 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.

The allowable particulate matter emission limits for EU5 may be calculated based upon the following equation:

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

Where:

E = Allowable particulate matter emission rate
P = Process weight rate

For process weight rate up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the Torit dust collector and particulate filters including periodic inspection, routine maintenance, repair of defects and visual emission checks.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected emission units are subject to the following:

Emissions and operation of the BMC mixer shall not exceed the following limits:

Polyester Resin and Polystyrene Resin Solution Usage		VOM Emissions	
(Pounds/Month)	(Tons/Year)	(Pounds/Month)	(Tons/Year)
40,000	217	1,536	8.32

These limits are based on maximum operation and standard emission factors plus error margin. Compliance with annual limits shall be determined from a running total of 12 months of data.

The above limitations were established in Permit 98120057, 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 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].

7.2.7 Testing Requirements

N/A

7.2.8 Monitoring Requirements

N/A

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected emission units:

a. Monthly unsaturated polyester resin usage in pounds;

b. Monthly polystyrene resin usage in pounds;

c. Starting monomer content of resins; and

d. VOM emissions as calculated in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected 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.

Emission of VOM in excess of the limits in Condition 7.2.6 within 30 days of a record showing such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

a. VOM emissions shall be calculated based on the following emission factor and equation:

Emission Factor for Uncontrolled
Polyester Resin Product Fabrication = 2% of Starting
For Vapor Suppressed Closed Molding Monomer Content

VOM Emissions = Resin Usage x Starting Monomer Content x Emission Factor

b. Compliance provisions addressing the particulate matter Conditions of 7.2.3(c) and (d) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected emission unit.

7.3 Dust Blow-Off Booth

7.3.1 Description

Panels to be painted move through the booth on the conveyor and the dust is removed manually by an operator blowing the dust off with compressed air. The booth is equipped with inlet and exhaust filters and discharges to the outside.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EU6	Dust Blow-Off Booth	Filters

7.3.3 Applicability Provisions and Applicable Regulations

a. The “affected blow-off booth” for the purpose of these unit-specific conditions is the blow-off booth listed in Condition 7.3.2.

b. The affected blow-off booth is subject to the emission limits identified in Condition 5.2.2.

c. The affected blow-off booth is subject to 35 IAC 212.321 which provides that:

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.

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

$$E = A\ (P)^{B}$$

Where:

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

Up to process weight rate of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected blow-off booth not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected blow-off booth does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Operational and Work Practices

N/A

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected blow-off booth is subject to the following:

N/A

7.3.7 Testing Requirements

N/A

7.3.8 Monitoring Requirements

N/A

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected blow off booth to demonstrate compliance with the conditions of this permit, pursuant to Section 39.57) of the Act:

a. Annual particulate matter emissions.

b. Operating schedule.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected blow-off booth 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

a. Compliance provisions addressing the limitations of Condition 7.3.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in the operation of the affected blow-off booth.

b. Particulate matter emissions may be estimated by using the equation in Condition 7.3.3(c).

7.4 Sanding, Fabrication Shops and Saw with Dust Collectors

7.4.1 Description

Flat goods are sanded or buffed on the top surface to produce an acceptable finish. The beam panel saw cuts flat good to custom lengths. In the fabrication shops custom pieces are prepared in a fabricating process which generates particulate matter.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EU8	Flat Goods Sanding, Small Sander	Dust Collector DFT2-8
EU9	Flat Goods Sanding, Large Sander	Dust Collector 20F-12
EU10	Beam Panel Saw	Dust Collector DFT2-16
EU11	Fabrication Shop	Dust Collector Fab Shop I
EU15	Fabrication Shop	Dust Collector Fab Shop II

7.4.3 Applicability Provisions and Applicable Regulations

a. The “affected emission units” for the purpose of these unit-specific conditions are the emission units listed in Condition 7.4.2.

b. The affected emission units are subject to the emission limits identified in Condition 5.2.2.

c. An affected emission unit is subject to 35 IAC 212.321 which provides that:

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.

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

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

Where:

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

Up to process weight rate of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

7.4.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceed major source threshold levels.

7.4.5 Operational and Work Practices

The owner or operator shall follow good operating practices for the dust collectors including periodic inspection, routine maintenance, repair of defects and visual emission checks.

7.4.6 Emission Limitations

N/A

7.4.7 Testing Requirements

N/A

7.4.8 Monitoring Requirements

N/A

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for affected electroplating lines to demonstrate compliance with the conditions of this permit, pursuant to Section 39.57) of the Act:

a. Particulate matter emissions; and

b. A maintenance log for the control equipment detailing all routine and nonroutine maintenance.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected 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.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

a. Compliance with the particulate matter limitations of Condition 7.4.3 is assured and achieved by the proper operation and maintenance of the dust collectors as required by this section and the work-practices inherent in the operation.

7.5 Paint Booths

7.5.1 Description

Panels to be painted move through a paint booth on the conveyor and are manually painted by operators with spray guns. In the touch up booth, parts from compression molding requiring touch up are painted.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EU7	Paint Booth and Drying Oven	Water Curtain
EU14	Touch Up Booth	None

7.5.3 Applicability Provisions and Applicable Regulations

a. The “affected paint booths” for the purpose of these unit-specific conditions are the paint booths listed in Condition 7.5.2.

b. The affected paint booths are subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit. If no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 215.301].

d. i. The Permittee shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period from an affected paint booth to exceed the following allowable emission rates [35 IAC 212.321]:

Metric Process Weight (Mg/hr)	Allowable Particulate Matter Emission (Kg/hr)	English Process Weight (T/hr)	Allowable Particulate Matter Emission (lbs/hr)
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77

Metric Process Weight (Mg/hr)	Allowable Particulate Matter Emission (Kg/hr)	English Process Weight (T/hr)	Allowable Particulate Matter Emission (lbs/hr)
0.2	0.42	0.20	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

ii. Interpolated and extrapolated values of the data shall be determined by using the equation:

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

Where:

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

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

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

7.5.4 Non-Applicability of Regulations of Concern

a. The affected paint booths are not subject to the coating operation requirements of 35 IAC 215 Subpart F, due to Subpart F not containing requirements on coating fiberglass molded products.

b. This permit is issued based on the affected paint booths not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected paint booths do not use an add-on control device to control a major source of emissions.

7.5.5 Operational and Production Limits and Work Practices

N/A

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected paint booths are subject to the following:

Emissions of VOM from the paint spray booth with oven (EU7) shall not exceed 89.2 tons/year. This limit is based on the maximum of 4,160 hours of operation, the maximum of 5.3 lb of photochemically non-reactive volatile organic material per gallon of paint used in spray booth.

The above limitations were established in Permit 89010040, 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 or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 62.21 [T1].

7.5.7 Testing Requirements

Upon request by the Illinois EPA, the VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, incorporated by reference in 35 IAC 215.105.

7.5.8 Monitoring Requirements

N/A

7.5.9 Recordkeeping Requirements

The Permittee shall collect and record the following information for the affected paint booths:

a. The VOM content of each paint, catalyst and reducer in units of pounds of VOM per gallon;

b. Monthly usages of paint, catalyst, and reducer for each paint booth; and

c. Monthly VOM emissions in pounds for each paint booth.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected paint booths 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.

Emissions of VOM in excess of the limits in Condition 7.5.6 within 30 days of a record showing such an occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

a. Compliance with emission limits shall be determined using the information listed below:

VOM Emissions = VOM Usage

b. Compliance provisions addressing Condition 7.5.3(d) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected paint booth.

7.6 Natural Gas-Fired Boilers

7.6.1 Description

Natural gas-fired boilers produce stream for heat and compression molding.

7.6.2 List of Emission Units

Emission Unit	Description	Maximum Firing Rate
EU12	2 Boilers	3.347 mmBtu/Hour

7.6.3 Applicability Provisions and Applicable Regulations

a. The “affected boilers” for the purpose of these unit-specific conditions are the paint booths listed in Condition 7.6.2.

b. Each affected boiler is subject to the opacity limits identified in Condition 5.2.2(b).

7.6.4 Non-Applicability of Regulations of Concern

a. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9, 1989, with firing rates of 100 mmBtu/hr or less, but greater than 10 mmBtu/hr. The firing rates of the affected boilers are below the firing rates for which the NSPS would be applicable. Therefore, these rules do not apply.

b. The affected boilers are not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of each affected boiler is less than 7.32 MW (250 mmBtu/hr).

c. The affected boilers are not subject to 35 IAC 216.121, emissions of CO from existing fuel combustion emission units, because the actual heat input of each affected boiler is less than 2.9 MW (10 mmBtu/hr).

d. This permit is issued based on the affected boilers not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.6.5 Operational and Production Limits and Work Practices

Each affected boiler shall only be fired by natural gas.

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boilers are subject to the following:

N/A

7.6.7 Testing Requirements

None

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items to demonstrate compliance pursuant to Section 39.5(7)(b) of the Act:

a. Annual operating hours for the affected boilers.

b. Annual aggregate NO_x, PM, SO_2, and VOM emissions from the affected boilers, based on the operating hours and the applicable emission factors.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected boilers 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.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

Emissions from the boilers burning natural gas shall be calculated based on the following emission factors:

Pollutant	Emission Factor ($Lb/10^6\ Ft^3$)
PM	1.9
SO_2	0.6
VOM	5.5
NO_x	100

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, March 1998.

Boiler Emissions (Pounds) = Maximum Firing Rate (mmBtu/Hr) x 1 Cubic Foot/Btu x Appropriate Emission Factor x Operating Hours (Hours/Year)

7.7 Chip Grinder

7.7.1 Description

Colored chips are ground to produce particles of a specific size for blending into thick and bulk molding compounds.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EU13	Chip Grinder	Dust Collector DFT2-12

7.7.3 Applicability Provisions and Applicable Regulations

a. The “affected grinder” for the purpose of these unit-specific conditions is grinder listed in Condition 7.7.2.

b. The affected grinder is subject to the emission limits identified in Condition 5.2.2.

7.7.4 Non-Applicability of Regulations of Concern

a. 35 IAC 212.321 particulate matter emissions from process emission units is not applicable because 35 IAC 212.681 exempts grinding.

b. This permit is issued based on the affected chip grinder not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected chip grinder does not have the potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.7.5 Operational and Production Limits and Work Practices

The owner or operator shall follow good operating practices for the dust collector including periodic inspection, routine maintenance, repair of defects and visual emission checks.

7.7.6 Emission Limitations

N/A

7.7.7 Testing Requirements

N/A

7.7.8 Monitoring Requirements

N/A

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items to demonstrate compliance pursuant to Section 39.5(7)(b) of the Act:

a. Particulate matter emissions; and

b. A maintenance log for the control equipment detailing all routine and non-routine maintenance.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected grinder 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.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.7.12 Compliance Procedures

a. Particulate matter emissions are negligible for the affected grinder therefore an engineering estimate may be used to determine particulate matter emissions.

b. Particulate matter emissions may be estimated using the equation in Condition 7.7.3(c).

7.8 Storage Tanks

7.8.1 Description

N-butyl acetate is stored in two tanks labeled EU17. Bulk methyl ethyl ketone is stored in Storage Tank EU16. Used methyl ethyl ketone from equipment cleaning is stored in Storage Tank EU18.

7.8.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Tank Capacity
EU16	Methyl Ethyl Ketone Storage Tank	1,500 Gallons
EU17	2 N-Butyl Acetate Storage Tanks	6,000 Gallons Per Tank
EU18	Used Methyl Ethyl Ketone Storage Tank	6,000 Gallons

7.8.3 Applicability Provisions and Applicable Regulations

a. The “affected storage tanks” for the purpose of these unit-specific conditions are the storage tanks listed in Condition 7.8.2.

b. The affected storage tanks are subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or submerged fill unless such tank is a pressure tank [35 IAC 215.122(b)]. Exception: If no odor nuisance exists this limitation only applies to the loading of volatile organic liquid with a vapor pressure of 2.5 psia at 70°F.

7.8.4 Non-Applicability of Regulations of Concern

a. The affected storage tanks are not subject to the requirements of 35 IAC 215.121 Storage Containers, because these tanks meet the following criteria:

The capacity of each tank is below 151 cubic meters (40,000 gallons).

b. This permit is issued based on the affected storage tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected storage tanks do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.8.5 Operational and Production Limits and Work Practices

N/A

7.8.6 Emission Limitations

There are no specific emission limitations for the affected storage tanks however, there are source wide emission limitations in Condition 5.5 that include these units.

7.8.7 Testing Requirements

Upon request by the Illinois EPA the Permittee shall test the vapor pressure of the materials stored in accordance with ASTM Method 02879-86.

7.8.8 Monitoring Requirements

N/A

7.8.9 Recordkeeping Requirements

The Permittee shall maintain the following records:

a. Total annual storage tanks throughput (gallons/year); and

b. Vapor pressure of materials stored in kPa or psia.

7.8.10 Reporting Requirements

The Permittee shall notify the Illinois EPA, Compliance Section of noncompliance of deviations of the affected storage tanks 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.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.8.12 Compliance Procedures

To determine compliance with Condition 5.5.1 emissions from the storage tank shall be calculated based on the following:

For the purpose of calculating VOM emissions from the storage tank, the current version of the TANKS program is acceptable.

7.9 Portable Mix Vessel Cleaning

7.9.1 Description

Portable mix vessels are cleaned with methyl ethyl ketone. Methyl ethyl ketone is a photochemically nonreactive organic material.

7.9.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EU19	Portable Mix Vessel Cleaning	None

7.9.3 Applicability Provisions and Applicable Regulations

a. The “affected cleaning process” for the purpose of these unit-specific conditions are the storage tanks listed in Condition 7.9.2.

b. The affected cleaning process is subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit. If no odor nuisance exists this limitation shall apply only to photochemically reactive material [35 IAC 215.301].

7.9.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected cleaning process not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected cleaning process does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.9.5 Operational and Production Limits and Work Practices

None

7.9.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected cleaning process is subject to the following:

N/A

7.9.7 Testing Requirements

If the Permittee takes or claims emission credit for VOM containing waste, the percent concentration of solvent shall be determined with test methods for evaluation of solid waste.

7.9.8 Monitoring Requirements

N/A

7.9.9 Recordkeeping Requirements

In addition to records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected cleaning process, pursuant to Section 39.5(7)(b) of the Act:

a. Monthly solvent usage in pounds.

b. Monthly solvent shipped off-site for recovery or disposal in pounds.

c. VOM content of solvent shipped off-site for recovery or disposal in terms of weight percent.

d. VOM content test results of solvent shipped off-site for recovery or disposal.

d. Monthly VOM emissions in pounds.

7.9.10 Reporting Requirements

The Permittee shall notify the Illinois EPA, Compliance Section of noncompliance of deviations of the affected cleaning process 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.

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.9.12 Compliance Procedures

Compliance with VOM emission limits for the affected cleaning process shall be based on the following:

VOM Emissions = Solvent Usage – [Solvent Shipped Off-Site x VOM Content]

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 _____**{insert public notice start date}** (the date of issuance of the draft 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. 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 Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [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 determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which 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. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (“Title I provisions”) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

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 [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

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

b. The liability of 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, 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, 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 such malfunction or breakdown is allowed by a permit condition [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 thereunder.

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, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

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

   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 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. As 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 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, Compliance 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 Section, 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 [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment 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:

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. Normally, an act of God such as lightning or flood is considered an emergency;

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.

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, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, 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 inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

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

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 under Section 39.5(15)(b) 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, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. 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

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.1 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: _____

10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;

- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

- Requires more frequent monitoring or reporting by the Permittee;

- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or

- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

- Are not modifications under any provision of Title I of the CAA;

- Are not required to be processed as a significant permit modification; and

- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- The source’s suggested draft permit/conditions;

- Certification by a responsible official that the

proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	**For Illinois EPA use only**
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information

1.	Source name:		
2.	Source street address:		
3.	City:		4. Zip code:
5.	Is the source located within city limits?		☐ Yes ☐ No
6.	Township name:	7. County:	8. I.D. number:

Owner Information

9.	Name:		
10.	Address:		
11.	City:	12. State:	13. Zip code:

Operator Information (if different from owner)

14.	Name		
15.	Address:		
16.	City:	17. State:	18. Zip code:

Applicant Information

19.	Who is the applicant? ☐ Owner ☐ Operator	20.	All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source
21.	Attention name and/or title for written correspondence:		
22.	Technical contact person for application:	23.	Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	☐ Yes ☐ No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:

BY:

_____ AUTHORIZED SIGNATURE	_____ TITLE OF SIGNATORY
_____ TYPED OR PRINTED NAME OF SIGNATORY	_____ / _____ / _____ DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.

3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.

4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.

5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.

6. Information addressing any outstanding transfer agreement pursuant to the ERMS.

7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible

official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.

9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.html.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

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

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Swan Corporation produces wet mold compounds and base compounds for thick and bulk molding in the blending process. Fiberglass is mixed together with the mold compounds. Then the compounds are added to the compression mold. The compounds are forced uniformly throughout the mold by the pressure exerted by the press. The compounds polymerizes because of the resin mixture, heat and pressure. Fiberglass parts are produced from this process. Fiberglass bath tub surrounds, sinks and counter tops are some of the items produced.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
EU1A	4 Unsaturated Polyester Resin Storage Tanks	1984	None
EU1B	2 Polystyrene Resin Storage Tanks	1984	None
EU2	Resin Blending	1985	Torit Dust Collector and Carbon Adsorber
EU3	Thick Molding Compound	1979	Particulate Filter and Activated Carbon Exhaust System
EU4	Bulk Molding Compound	1989	Particulate Filter and Activated Carbon System
EU5	Compression Molding	1965	None
EU6	Dust Blow-Off Booth	1997	None
EU7	Paint Booth and Drying Oven	1990	Water Curtain
EU8	Flat Goods Sanding, Small Sander	1996	Dust Collector DFT2-8
EU9	Flat Goods Sanding, Large Sander	1996	Dust Collector 2OF-12
EU10	Beam Panel Saw	1990	Dust Collector DFT-16
EU11	Fabrication Shop	1996	Dust Collector
EU12	2 Boilers	1984	None

EU13	Chip Grinder	1996	Dust Collector DFT2-12
EU14	Touch Up Booth	1997	None
EU15	Fabrication Shop	1999	Dust Collector

Emission Unit	Description	Date Constructed	Emission Control Equipment
EU16	Methyl Ethyl Ketone Storage Tank	1987	None
EU17	2 n-Butyl Acetate Storage Tanks	1987	None
EU18	Used Methyl Ethyl Ketone Storage Tank	1998	None
EU19	Portable Mix Vessel Cleaning	1990	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	158.57
Sulfur Dioxide (SO_2)	0.02
Particulate Matter (PM)	3.69
Nitrogen Oxides (NO_x)	2.93
HAP, not included in VOM or PM	----
Total	165.21

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board’s emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also

contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source’s permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

DWH:99010001:jar