

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - NSPS SOURCE -- RENEWAL

PERMITTEE

IKO Chicago, Inc.
Attn: David Foulkes
6600 South Central Avenue
Bedford Park, Illinois 60638

<u>Application No.:</u> 83010045	<u>I.D. No.:</u> 031012AEL
<u>Applicant's Designation:</u>	<u>Date Received:</u> January 26, 2007
<u>Subject:</u> Asphalt Roofing Manufacturing	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 6600 South Central Avenue, Bedford Park, Cook County, 60638	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

two asphalt oxidizer blowing stills controlled by an afterburner/asphalt heater;

twelve (12) asphalt product storage tanks controlled by a fume eliminator:
two 169,000 gallons,
four 33,800 gallons,
one 46,500 gallons,
one 32,000 gallons,
one 7,500 gallons,
one 2,500 gallons,
one 1,000 gallons, and
one 900 gallons;

one asphalt dip saturator/coater controlled by a scrubber/filter (HEAF unit);

two filler material storage silos with conveying system controlled by baghouse;

one backing material storage silo with conveying system, twenty granule storage silos, one granule conveying and application system, one coating/filler mixer, all controlled by main production dust collector;

one shingle laminating line comprised of one adhesive (oxidized asphalt/rubber) mixing tank, one adhesive holding/application tank and one shingles cutter, and

natural gas-fired space heaters, two oil heaters, one coating preheater, one saturant preheater

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year of particulate matter less than 10 microns (PM₁₀), carbon monoxide (CO), and volatile organic materials (VOM), 10 tons year for a single hazardous air pollutant (HAP) and 25 tons/year of any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
 - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
 - b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permits issued for this location.
- 2a. The saturators and each mineral handling and storage facility at this source are subject to the New Source Performance Standards (NSPS) for Asphalt Processing and Asphalt Roofing Manufacture, 40 CFR 60, Subparts A and UU. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
 - b. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
 - c. Pursuant to 40 CFR 60.472(a), on and after the date on which 40 CFR 60.8(b) requires a performance test to be completed, no owner or operator subject to the provisions of 40 CFR 60 Subpart UU shall cause to be discharged into the atmosphere from any saturator:
 - i. Particulate matter in excess of:
 - A. 0.04 kg/Mg (0.08 lb/ton) of asphalt shingle or mineral-surfaced roll roofing produced, or
 - B. 0.04 kg/Mg (0.08 lb/ton) of saturated felt or smooth-surfaced roll roofing produced;

- ii. Exhaust gases with opacity greater than 20 percent; and
 - iii. Any visible emissions from a saturator capture system for more than 20 percent of any period of consecutive valid observations totaling 60 minutes. Saturators that were constructed before November 18, 1980, and that have not been reconstructed since that date and that become subject to these standards through modification are exempt from the visible emissions standard. Saturators that have been newly constructed or reconstructed since November 18, 1980 are subject to the visible emissions standard.
- d. Pursuant to 40 CFR 60.472(b), on and after the date on which 40 CFR 60.8(b) requires a performance test to be completed, no owner or operator subject to the provisions of 40 CFR 60 Subpart UU shall cause to be discharged into the atmosphere from any blowing still:
- i. Particulate matter in excess of 0.67 kg/Mg (1.3 lb/ton) of particulate per megagram of asphalt charged to the still when a catalyst is added to the still; and
 - ii. Particulate matter in excess of 0.60 kg/Mg (1.2 lb/ton) of asphalt charged to the still during blowing without a catalyst; and
 - iii. Exhaust gases with an opacity greater than 0 percent unless an opacity limit for the blowing still when fuel oil is used to fire the afterburner has been established by the Illinois EPA or USEPA in accordance with the procedures in 40 CFR 60.474(g).
- e. Pursuant to 40 CFR 60.472(c), within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, no owner or operator subject to the provisions of 40 CFR 60 Subpart UU shall cause to be discharged into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. If, however, the emissions from any asphalt storage tank(s) are ducted to a control device for a saturator, the combined emissions shall meet the emission limit contained in 40 CFR 60.472(a) during the time the saturator control device is operating. At any other time the asphalt storage tank(s) must meet the opacity limit specified above for storage tanks.
- f. Pursuant to 40 CFR 60.472(d), within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, no owner or operator subject to the provisions of 40 CFR 60 Subpart UU shall cause to be discharged into the atmosphere from any mineral handling and storage facility emissions with opacity greater than 1 percent.

- 3a. 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 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 Ill. Adm. Code 212.301 and 212.314.
- c. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- d. Pursuant to 35 Ill. Adm. Code 212.307, all unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods.
- e. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- f. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;

- v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- g. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
4. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air, pursuant to 35 Ill. Adm. Code 216.121.
5. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.
- 6a. Pursuant to 35 Ill. Adm. Code 218.122(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 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.

- d. Pursuant to 35 Ill. Adm. Code 218.926(a), every owner or operator of miscellaneous fabricated product manufacturing process emission unit subject to 35 Ill. Adm. Code 218 Subpart PP shall comply with the requirements of 35 Ill. Adm. Code 218.926(a), (b) or (c):
 - i. Emission capture and control techniques which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit; or
 - ii. For coating lines: The daily-weighted average VOM content shall not exceed 0.42 kg VOM/1 (3.5 lbs VOM/gal) of coating as applied (minus water and any compounds which are specifically exempted from the definition of VOM) during any day. Owners and operators complying with this limitation are not required to comply with 35 Ill. Adm. Code 218.301.
- 7a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
- 8a. The operation and emissions of the two asphalt oxidizer blowing stills shall not exceed the following limits:

- i. Coating Asphalt Production: 30,000 ton/mo, 240,000 ton/yr
- ii. Emissions:

<u>Pollutant</u>	<u>Emission Factor</u> (lb/Ton)	<u>Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
Particulate Matter (PM)	0.026	0.4	3.1
Carbon Monoxide (CO)	0.52	7.8	62.4
Volatile Organic Material (VOM)	0.017	0.3	2.0
Hydrogen Chloride (HCl)	0.052	0.8	6.2

These limits are based on the maximum coating asphalt production of 20.3 ton/hr in each still, standard emission factors (Table 11.2-4, AP-42, Fifth Edition, Volume I, January 1995) for VOM and the test data for PM, CO and HCl.

- b. The operation and emissions of the asphalt dip saturator/coater shall not exceed the following limits:
 - i. Shingles Production: 30,000 ton/mo, 250,000 ton/yr

ii. Emissions:

<u>Pollutant</u>	<u>Emission Factor</u> (Lb/Ton)	<u>Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
Particulate Matter (PM)	0.056	0.8	7.0
Carbon Monoxide (CO)	0.0019	0.03	0.2
Volatile Organic Material (VOM)	0.094	1.4	11.8

These limits are based on the maximum shingles production of 41.8 ton/hr, standard emission factors (Table 11.2-4, AP-42, Fifth Edition, Volume I, January 1995) for CO and VOM and the test data for PM.

- c. Operation and emissions of the natural gas-fired equipment shall not exceed the following limits:

i. Natural Gas Usage: 70 mmscf/mo, 600 mmscf/yr

ii. Emissions:

<u>Pollutant</u>	<u>Emission Factor</u> (lb/mmscf)	<u>Emissions</u>	
		(Ton/Mo)	(Ton/Yr)
Nitrogen Oxides (NO _x)	100	3.5	30.0
Carbon Monoxide (CO)	84	2.9	25.2
Particulate Matter (PM)	7.6	0.3	2.3
Volatile Organic Materials (VOM)	5.5	0.2	1.7

These limits are based on the maximum operating rate and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- d. This permit is issued based on negligible emissions of volatile organic materials and particular matter from the shingles laminating line. For this purpose emissions of each pollutant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- e. This permit is issued based on negligible emissions of particular matter from the asphalt product storage tanks, filler material storage silos and backing materials handling operations. For this purpose emissions of from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
9. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
10. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

- 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 12 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 12a. Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This Condition shall not apply to 35 Ill. Adm. Code 212.301.
- b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15

feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.

- c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
 - d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
 - e. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
13. Pursuant to 35 Ill. Adm. Code 218.928(a), when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with 35 Ill. Adm. Code 218.926, the owner or operator of a VOM emission unit subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105.
- 14a. Pursuant to 40 CFR 60.473(a), the owner or operator subject to the provisions of 40 CFR 60 Subpart UU, and using either an electrostatic precipitator or a high velocity air filter to meet the emission limit in 40 CFR 60.472(a)(1) and/or (b)(1) shall continuously monitor and record the temperature of the gas at the inlet of the control device. The temperature monitoring instrument shall have an accuracy of $\pm 15^{\circ}\text{C}$ ($\pm 25^{\circ}\text{F}$) over its range.
- b. Pursuant to 40 CFR 60.473(b), the owner or operator subject to the provisions of 40 CFR 60 Subpart UU and using an afterburner to meet the emission limit in 40 CFR 60.472(a)(1) and/or (b)(1) shall continuously monitor and record the temperature in the combustion zone of the afterburner. The monitoring instrument shall have an accuracy of $\pm 10^{\circ}\text{C}$ ($\pm 18^{\circ}\text{F}$) over its range.
- 15a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor

for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.

- b. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or $\pm 0.5^\circ$ C, whichever is greater.
16. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
17. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 18a. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by

maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.

- b. Pursuant to 35 Ill. Adm. Code 218.991(a)(2), any owner or operator of a VOM emission unit which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT and complying by the use of emission capture and control equipment shall collect and record all of the following information each day and maintain the information at the source for a period of three years:
 - i. Control device monitoring data.
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source.
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- c. Pursuant to 35 Ill. Adm. Code 218.991(b)(2), any owner or operator of a coating line which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT and complying by means of the daily-weighted average VOM content limitation shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
 - i. The name and identification number of each coating as applied on each coating line;
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line; and
 - iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 Ill. Adm. Code 218.104.
- 19a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Records addressing use of good operating practices for the pollution control equipment covered under this permit:
 - A. Records for periodic inspection of the pollution control equipment covered under this permit with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Coating asphalt production (tons/month and tons/year);

- iii. Shingles production in tons/month and tons/year;
 - iv. Natural gas usage (mmscf/mo and mmscf/yr); and
 - v. Monthly and annual emissions of CO, NO_x, PM, PM₁₀, SO₂, VOM and HAPs (including hydrogen chloride) with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
20. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Unit in Springfield, Illinois within 30 days after the exceedance/deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
21. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 22a. Pursuant to 35 Ill. Adm. Code 218.991(a)(3), any owner or operator of a VOM emission unit which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT and complying by the use of emission capture and control equipment shall notify the Illinois EPA:
- i. Of any violation of the requirements of 35 Ill. Adm. Code 218 Subpart PP, QQ, RR or TT by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation;
 - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of capture systems and control devices to the use of complying coatings, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(b)(1). Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of capture systems and control devices to the use of complying coatings, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(b).

- b. Pursuant to 35 Ill. Adm. Code 218.991(b)(3), any owner or operator of a coating line which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT and complying by means of the daily-weighted average VOM content limitation shall notify the Illinois EPA:
 - i. Of a violation of the requirements of 35 Ill. Adm. Code 218 Subpart PP or TT by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation;
 - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(a)(1). Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart PP or TT from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.991(a).

23. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

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

ECB:VJB:

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the asphalt roofing manufacturing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons per year of CO, PM₁₀, and VOM, 10 tons per year for a single HAP, and 25 tons per year for combined HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emission Units</u>	E M I S S I O N S					
	<u>VOM</u>	<u>PM</u>	<u>NO_x</u>	<u>CO</u>	<u>Single HAP</u>	<u>Total HAP</u>
Asphalt Blowing Stills	2.0	3.1		62.4	6.2	
Asphalt Saturator	11.8	7.0		0.2		
Asphalt Storage Tanks		0.44				
Filler Storage Silos		0.44				
Backing Material						
Handling System		0.44				
Shingle Laminating Line	0.44	0.44				
Fuel Combustion						
Equipment	<u>1.7</u>	<u>2.3</u>	<u>30.0</u>	<u>25.2</u>		
Total	15.9	13.7	30.0	87.8	9.0	22.5

VJB: