

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

K & K Iron Works, Inc.
Attn: Jerry Kulhanek
5100 South Lawndale Avenue
McCook, Illinois 60525

I.D. No.: 031174AAW
Application No.: 07020020

Date Received: February 2, 2007
Date Issued: June 26, 2008
Expiration Date¹: June 26, 2013

Operation of: Manufacturing of Structural Steel
Source Location: 5100 South Lawndale Avenue, McCook, Cook County, Illinois
60525
Responsible Official: Jerry Kulhanek, Secretary/Treasurer

This permit is hereby granted to the above-designated Permittee to OPERATE a Structural Steel Manufacturing 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 Anatoly Belogorsky at 217/782-2113.

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

ECB:AB:psj

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

K & K Iron Works, Inc.
5100 South Lawndale Avenue
McCook, Illinois 60525

708/924-0000

I.D. No.: 031174AAW

County: Cook

Standard Industrial Classification: 3441, Manufacturing-Fabricated
Structural Metal

1.2 Owner/Parent Company

K & K Iron Works, Inc.
5100 South Lawndale Avenue
McCook, Illinois 60525

1.3 Operator

K & K Iron Works, Inc.
5100 South Lawndale Avenue
McCook, Illinois 60525

Jerry Kulhanek
708/924-0000

1.4 Source Description

K & K Iron Works, Inc. is located at 5100 South Lawndale Avenue in
McCook and conducts spray coating of the steel structural components.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1N."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
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 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Flux Core Arch Welding

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

None

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

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

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

3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.
- 3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, a vapor recovery system, or an equivalent device approved by the Illinois EPA. [Note: storage tanks used for storing gasoline and any hazardous air pollutants are not illegible for insignificant activities].

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

Unit/Operations	Description	Emission Control Equipment	Subsection
Spray Coating	Fabricated Steel Spray Coating	Dry Fabric Filter (prevention from overspray)	7.1

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

5.2 Area Designation

5.2.1 This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment), PM₁₀, PM_{2.5}, and attainment or unclassifiable for all other criteria pollutants (CO, lead, NO_x, SO₂).

5.3 Source-Wide Applicable Provisions and Regulations

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

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability, if not otherwise specified anywhere in this permit:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
- c. Except as otherwise provided in 35 IAC Part 212, no person shall cause or allow the emission into the atmosphere of PM₁₀, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period [35 IAC 212.324(b)]

- d. The mass emission limits contained in Condition 5.3.2(c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this Condition is not a defense finding of a violation of the mass emission limits contained in Condition 5.3.2(c) and 35 IAC 212.324(b)) [35 IAC 212.324(d)].

5.3.3 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with a fugitive particulate matter operating program submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph (b) below.
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source 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 [35 IAC 212.306].

5.3.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

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

5.3.5 Risk Management Plan (RMP)

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

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

5.3.6 PM₁₀ Contingency Measure Plan

Should the actual annual source-wide emissions of PM₁₀ equal to or exceed 15 tons, then the Permittee shall prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U. This permit may also have to be revised or reopened to address this regulation (see Condition 9.12.2).

5.3.7 Future Emission Standards

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

any violation of applicable requirements prior to or at the time of permit issuance.

5.4 Source-Wide Non-Applicability of Regulations of Concern

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

5.5 Source-Wide Control Requirements and Work Practices

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

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	24.83
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	2.10
Nitrogen Oxides (NO _x)	0.07
HAP, not included in VOM or PM	----
Total	27.00

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions (see also Condition 7.1.6(b)). However, based on the USEPA policy ("once in - always in" provision) the source is considered to be major for the underlined MACT standard, 40 CFR Part 63, Subpart M. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements as specified in Section 7.1.

5.6.3 Other Source-Wide Production and Emission Limitations

See Condition 7.1.6 for the source-wide production and emission limits.

5.7 Source-Wide Testing Requirements

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

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

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

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Conditions 5.6.1 and 5.6.3, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Records for HAP Emissions

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

5.9.3 Retention and Availability of Records

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

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

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

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Compliance Procedures

5.11.1 General Procedures for Calculating Emissions

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

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

6.1.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.1.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal

allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.1.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Spray Coating

7.1.1 Description

The Permittee conducts spray coating of the steel structural components either in a dedicated paint room or on the concrete tarmac outside the shop/paint room areas.

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

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Spray Coating	Fabricated Steel Spray Coating	Prior to 2004 (coating operations) 11/2006 (Dry Filter)	Dry Fabric Filter (overspray prevention)

7.1.3 Applicable Provisions and Regulations

a. An "affected coating operation" for the purpose of these unit specific conditions is an emission unit/operation described in Conditions 7.1.1 and 7.1.2 above.

b. The affected coating operation is subject to 35 IAC 212.321(b)(1), 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, 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 (See also Attachment 2) [35 IAC 212.321(a)].

c. Each affected coating operation is subject to the following requirements of 35 IAC 218.204(j)(2)(A):

i. No owner or operator of an affected coating operation shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the extreme performance coating (air dried) as applied to Miscellaneous Metal Parts and Products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and

any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/liter</u>	<u>lbs/gallon</u>
0.42	3.5

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

- d. The affected coating operations are subject to 40 CFR Part 63 Subpart M "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products" and the following emission limitations apply pursuant to 40 CFR 63.3890(b)(1):

For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified below:

For each existing general use coating, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

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

Emission rate without add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The Permittee shall meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

- f. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission

units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

- g. Except as otherwise provided in 35 IAC Part 212, no person shall cause or allow the emission into the atmosphere of PM₁₀, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period [35 IAC 212.324(b)]

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coating operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating operations are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).
- b. The affected coating operation is not subject to 35 IAC Part 218 Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes affected coating operation from this requirement.

7.1.5 Control Requirements and Work Practices

The control requirements and work practices are not set for the affected coating operations.

7.1.6 Production and Emission Limitations

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

- a. i. The total coating/cleanup solvents usage and VOM emissions from the affected coating operations shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Paints & Coatings	1,000	12,000	1.75	21.00
Cleanup Solvents	95.0	1140.0	0.32	3.83

- ii. These limits are based on the maximum production rate and the VOM content in applied coating and cleanup solvents equal to 3.5 lb/gallon and 6.71 lb/gallon, respectively.
- iii. The above limitations are being established in this permit pursuant to Title I of the CAA, specifically MSSCAM and/or PSD. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that

limit the VOM emissions from the affected coating operations below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

- iv. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1N].
- b. The total HAP usage and HAP emissions from the affected coating operations shall not exceed the following limits:

HAP	HAP Usage (Ton/Year)	HAP Emissions (Ton/Year)
Individual HAP	9.9	9.9
Total HAP's	24.9	24.9

These limits are established to limit potential to emit (PTE) of HAP's below major source thresholds. However, based on the USEPA policy ("once in - always in" provision) the source is considered to be major for the underlined MACT standard, 40 CFR Part 63, Subpart Mmmm.

7.1.7 Testing Requirements

- a. Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.204, and Section 39.5(7)(b) of the Act]:

Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating lines shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

- i. The VOM content of representative coatings "as applied" on the affected coating lines shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
- ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9 directly reflect the application of such material and separately account for any additions of solvent [35 IAC 218.105(a)].
- b. Testing for compliance demonstration with the HAP emission limits established in Condition 7.1.3(d) and Subpart Mmmm shall be performed as follows [40 CFR 63.3941]:

- i. *Determine the mass fraction of organic HAP for each material used.* The Permittee shall determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using the following:
 - A. *(Method 311 appendix A to 40 CFR part 63).* Method 311 is used for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test.
 - 1. Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791).
 - 2. Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).
 - B. *(Method 24 appendix A to 40 CFR part 60).* For coatings, Method 24 shall be used to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to subpart PPPP of this part, rather than Method 24. The Permittee shall use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart PPPP of this part, as a substitute for the mass fraction of organic HAP.
 - C. *Information from the supplier or manufacturer of the material.* The Permittee may rely on information other than that generated by the

test methods specified above, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, the Permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

- c. The applicable testing described above should be performed once in five years at the time of renewal of this CAAPP permit. This condition is established pursuant to 39.5(7) of the Act.

7.1.8 Monitoring Requirements

- a. Testing requirements described in Condition 7.1.7 and continuous compliance procedures in Condition 7.1.12 should be used as a surrogate for the monitoring of VOM and HAP content in the applied coatings or cleanup solvents.
- b. This condition is established in accordance with provisions 39.5(7) of the Act.

7.1.9 Recordkeeping Requirements

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

- a. Records required by 40 CFR 63.3930 and 63.3931:
 - i. A copy of each notification and report submitted to comply with this subpart, and the documentation supporting each notification and report.
 - ii. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's

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

- iii. For each compliance period, the following specified records:
 - A. A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.
 - B. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941.
 - C. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951.
- iv. A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used.
- v. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning

material used during each compliance period unless the material is tracked by weight.

- vi. A record of the volume fraction of coating solids for each coating used during each compliance period.
 - vii. If you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
 - viii. You must keep records of the date, time, and duration of each deviation.
 - ix. Your records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
 - x. As specified in 40 CFR 63.10(b)(1), the Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
 - xi. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The Permittee may keep the records off-site for the remaining 3 years.
- b. Coatings:
- i. The usage of each coating, in units of gallons/month and gallons/year.
 - ii. Density of each coating in units of lbs/gallon.
 - iii. VOM content of each coating in weight percent.
 - iv. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on the affected coating operations.
- c. Cleanup solvents:
- i. VOM content of each cleanup solvent used in lbs/gal.
 - ii. Amount of each cleanup solvent used in gallons/month and gallons/year.

- d. Individual and total HAP usage (t/month and t/year) as applied.
- e. Total monthly/annual VOM and HAP emissions from the affected coating operations calculated in accordance with compliance procedures of Condition 7.1.12.
- f. Records of the testing of VOM content (wt. %) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- g. The Permittee shall keep the following records of maintenance and repair pursuant to 35 IAC 212.324(g):
 - i. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 IAC 212.324(f).
 - ii. The owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.
 - iii. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.
 - iv. Copies of all records required by 35 IAC 212.324(g) shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.
 - v. The records required under 35 IAC 212.324(g) shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by the Illinois EPA representatives during working hours.

- vi. Upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

7.1.10 Reporting Requirements

- a. The semiannual compliance reports and deviations reports shall be submitted in accordance with 40 CFR 63.3920(a). The required semiannual compliance reports may be combined and presented with semiannual monitoring reports described in Condition 8.6.1.
- b. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected coating operations with the permit requirements, 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 PM₁₀ and VOM in excess of the limits specified in Conditions 7.1.3 and 7.1.6 within 30 days of such occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected coating operations.

7.1.12 Compliance Procedures

- a. Compliance with the PM₁₀ emission limits of Condition 7.1.3 shall be achieved by decreasing overspray through utilization of the filter system.
- b. Compliance of the affected coating operations with VOM emission limitations of Condition 7.1.3(c) shall be based on the recordkeeping requirements of Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use the formula listed below:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D],$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \Sigma (w_i/d_i),$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i , lb/gal

and the summation Σ is applied over water and all exempt compounds i in the coating.

- c. Total VOM and HAP emissions from the affected coating operations (from both coating and cleanup operations) shall be calculated based on the following:

$$E_T = E_c + E_o$$

Where:

E_T = Total VOM/HAP emissions, in pounds/month

E_c = VOM/HAP emissions from all coatings, in pounds/month

E_o = VOM/HAP emissions from all other VOM/HAP-containing materials (e.g., cleanup solvents), in pounds/month,

And

$$E_c = \sum_{i=1}^n U_i V_i W_i$$

Where:

U_i = Usage of coating i , in gallons/month

V_i = Density of coating i , in lb/gal

W_i = VOM/HAP content of coating i , in weight percent

and the summation Σ is over all coatings i ; and

$$E_o = \sum_{j=1}^n U_j V_j$$

Where:

U_j = Usage of VOM/HAP-containing material j , in lb/month

V_j = VOM/HAP content of VOM/HAP-containing material j , in weight percent

and the summation Σ is over all VOM/HAP-containing materials j (other than coatings).

d. Continuous compliance demonstration procedures with Subpart MMMM [40 CFR 63.3942]:

- i. For each compliance period to demonstrate continuous compliance, the Permittee must use no coating for which the organic HAP content (determined using Equation 2 of 40 CFR 63.3941) exceeds the applicable emission limit in 40 CFR 63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to 40 CFR 63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in 40 CFR 63.3940, is the end of a compliance period consisting of that month and the preceding 11 months.
- ii. If the Permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in 40 CFR 63.3910(c)(6) and 63.3920(a)(5).
- iii. As part of each semiannual compliance report required by 40 CFR 63.3920, the Permittee must identify the coating operation(s) for which the compliant material option is used. If there were no deviations from the applicable emission limit in 40 CFR 63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in 40 CFR 63.3890, and no thinner and/or other additive, or cleaning material is used that contained organic HAP, determined according to 40 CFR 63.3941(a).

7.1.13 Compliance Schedule

- a. The Permittee was sent a Violation Notice VN A-2208-00018 by the Illinois EPA for failing to comply with 35 IAC Part 218, 35 IAC 212.309, 40 CFR Part 63 Subpart MMMM and Sections 9(a) and 39.5 of the Illinois Environmental Protection Act for the affected metal coating operations. Notwithstanding Condition 8.1 of this permit, compliance with the terms of this permit does not shield the Permittee from possible enforcement actions initiated by either the USEPA or the Illinois EPA involving the above named emission units or activities. In addition, compliance with

the terms of this permit does not serve as proof of compliance for the emission units or activities addressed in this pending enforcement action.

b. Progress towards Compliance

The Permittee shall comply with the following schedule of compliance to address compliance for the affected coating operations:

Interim Commitment	Timeframe
1. Conduct an initial compliance demonstration in accordance with 40 CFR 63.3950	No later than any timeframe established pursuant to resolution of the above stated VN.
a. Submit a historical compilation of annual VOM and HAP emissions emitted from the spraying operations from 1998 to the present.	No later than any timeframe established pursuant to resolution of the above stated VN.
b. Submit a certification of compliance and an initial certification pursuant to 35 IAC 218.211 and 40 CFR 63.3910.	No later than any timeframe established pursuant to resolution of the above stated VN.
2. Implement and maintain all necessary records and reports required by 35 IAC 218.211 and 40 CFR 63.3930, 63.3931, 63.3920.	Immediately, unless some other timeframe has been established pursuant to resolution of the above stated VN.
3. Achieve the full compliance with 35 IAC 218.204(j) and 40 CFR 63, Subpart MMMM	No later than any timeframe established pursuant to resolution of the above stated VN.
4. Submit a fugitive control operating program	No later than any timeframe established pursuant to resolution of the above stated VN.
5. Implement fugitive control operating program requirements pursuant to 35 IAC 212.309, 212.310 and 212.312	No later than any timeframe established pursuant to resolution of the above stated VN.

c. Submittal of Progress Reports

A Progress Report shall be submitted every six months, beginning six months from the date of issuance of this permit and ending upon the achievement of compliance. The Progress Report shall contain at least the following:

- i. The required timeframe for achieving the interim commitment or action in the schedules for compliance, and actual dates when such interim commitment or action is achieved.
- ii. Any explanation of why any required timeframe in the schedule of compliance was not met, and any preventive or corrective measures adopted to achieve the required interim commitment that was not met.
- iii. Progress reports shall be submitted to the following:

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276; and

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

- d. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such outstanding issue (e.g., include a new compliance schedule, identify appropriate applicable requirements, establish new requirements). The Permittee shall apply for revision of this permit to address the requirements imposed as part of resolution of any related enforcement action no later than 180 days after achieving full compliance with such requirements.

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 March 20, 2008, unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

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

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of

such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	July 31
July - December	January 31

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

8.6.2 Test Notifications

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

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

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

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

8.6.4 Reporting Addresses

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

- i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
 Bureau of Air
 Compliance & Enforcement Section (MC 40)
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
 Bureau of Air
 Air Quality Planning Section (MC 39)
 1021 North Grand Avenue East
 P.O. Box 19276
 Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

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

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

practices, or operations regulated or required under this permit;

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

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254. The regulated air pollutants (including HAP's) from the entire source and individual emission units or group of emission units have to be addressed in the Annual Emission Report and calculated as recommended in Condition 5.12.1(b).

9.8 Requirements for Compliance Certification

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

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

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

- ii. The permitted source was at the time being properly operated;

- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.

- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.
- d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(1) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

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

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

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- b. 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, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
 - i. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

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

Where:

P = Process weight rate

E = Allowable emission rate

- ii. For process weight rates of 408 Mg/hr (450 T/hr):

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

- iii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

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

c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

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

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

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

Attachment 4 Guidance

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

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

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

www.epa.state.il.us/air/caapp/index.html

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

www.epa.state.il.us/air/caapp/199-caapp.pdf

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

AB:psj