217/782-2113

"REVISED"

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

and

TITLE I PERMIT[1]

PERMITTEE

Plastic Decorators, Inc.
Attn: Mr. David Albright
1330 Holmes Road
Elgin, Illinois 60123

Application No.: 98010086 I.D. No.: 089438AGC
Applicant's Designation: Date Received: January 29, 1998
Operation of: Automotive Knobs and Switch Parts Manufacturing
Date Issued: April 30, 1999 Expiration Date[2]: April 30, 2004
Source Location: 1330 Holmes Road, Elgin, Kane County
Responsible Official: Raymond A. DeMatteo, CEO

This permit is hereby granted to the above-designated Permittee to OPERATE a Automotive Knobs and Switch Parts Manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: October 20, 2000
Revision Date Issued: March 20, 2001
Purpose of Revision: Administrative Amendment

This administrative amendment incorporates the equipment listed in construction permit 00100070. Because the changes in the permit were only administrative, no formal public notice will be issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supercedes those terms and conditions of the permit for which the conflict exists. The previous permit issued April 12, 1999 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

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

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

DES:RWB:jar

cc: Illinois EPA, FOS, Region 1
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit.

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

TABLE OF CONTENTS

		PAGE
1.0	SOURCE IDENTIFICATION	4
	1.1 Source	
	1.2 Owner/Parent Company	
	1.3 Operator	
	1.4 General Source Description	
2.0	LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0	INSIGNIFICANT ACTIVITIES	7
	3.1 Identification of Insignificant Activities	
	3.2 Addition of Insignificant Activities	
4.0	SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0	OVERALL SOURCE CONDITIONS	10
	5.1 Source Description	
	5.2 Applicable Regulations	
	5.3 Non-Applicability of Regulations of Concern	
	5.4 Source-Wide Operational and Production Limits and Work Practices	
	5.5 Source-Wide Emission Limitations	
	5.6 General Recordkeeping Requirements	
	5.7 General Reporting Requirements	
	5.8 General Operational Flexibility/ Anticipated Operating Scenarios	
	5.9 General Compliance Procedures	
6.0	EMISSION REDUCTION MARKET SYSTEM (ERMS)	14
	6.1 Description of ERMS	
	6.2 Applicability	
	6.3 Obligation to Hold Allotment Trading Units (ATUs)	
	6.4 Market Transaction	
	6.5 Emission Excursion Compensation	
	6.6 Quantification of Seasonal VOM Emissions	
	6.7 Annual Account Reporting	
	6.8 Allotment of ATUs to the Source	
	6.9 Recordkeeping for ERMS	
	6.10 Federal Enforceability	
	6.11 Exclusions from Further Reduction	
7.0	UNIT SPECIFIC CONDITIONS	21
	7.1 Units PD Paint Department	

PAGE

8.0 GENERAL PERMIT CONDITIONS 33

8.1 Permit Shield
8.2 Applicability of Title IV Requirements
8.3 Emissions Trading Programs
8.4 Operational Flexibility/Anticipated Operating Scenarios
8.5 Testing Procedures
8.6 Reporting Requirements
8.7 Obligation to Comply with Title I Requirements

9.0 STANDARD PERMIT CONDITIONS 38

9.1 Effect of Permit
9.2 General Obligations of Permittee
9.3 Obligation to Allow Illinois EPA Surveillance
9.4 Obligation to Comply with Other Requirements
9.5 Liability
9.6 Recordkeeping
9.7 Annual Emissions Report
9.8 Requirement for Compliance Certification
9.9 Certification
9.10 Defense to Enforcement Actions
9.11 Permanent Shutdown
9.12 Reopening And Reissuing Permit For Cause
9.13 Severability Clause
9.14 Permit Expiration and Renewal

10.0 ATTACHMENTS

10.1 Attachment 1 - Emissions of Particulate Matter from New Process Emission Units 1-1
10.2 Attachment 2 – Net VOM Emissions Increase Determination 2-1
10.3 Attachment 3 - Example Certification by a Responsible Official 3-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Plastic Decorators, Inc.
1330 Holmes Road
Elgin, Illinois 60123
847/697-1330

I.D. No.: 089438AGC
Standard Industrial Classification: 3089, Plastic Products

1.2 Owner/Parent Company

Plastic Decorators, Inc.
1330 Holmes Road
Elgin, Illinois 60123

1.3 Operator

Plastic Decorators, Inc.
1330 Holmes Road
Elgin, Illinois 60123

Ms. Catherine Burger, Supervisor, Human Resources
630/907-1306

1.4 General Source Description

Plastic Decorators Inc. is located at 1330 Holmes Road in Elgin. The source molds, paints, prints, and laser etches small plastic parts primarily for the automotive industry. These parts are typically used as switches, knobs, and dial faces, which are sold chiefly to automotive customers for assembly into finished automobiles.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution 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 27717
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
ERMS	Emission Reduction Market System
gal	gallon
hr	hour
HAP	Hazardous Air Pollutants
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mg	Metric Tonnes or Megagrams
mmBtu	Million Btus
mo	month
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
SO_2	Sulfur Dioxide
T	Ton
T1	Title I - identifies Title I conditions that have been carried over from an existing construction 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 construction permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt.	Weight

yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Laser Department

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:

Regrind Department

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)].

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

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

3.2 Addition of Insignificant Activities

3.2.1 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).

3.2.2 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.

3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
1	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #1)	December, 1992	None
2	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #2)	August, 1984	None
4	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #4)	August, 1984	None
5	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #5)	August, 1984	None
6	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #6)	August, 1984	None
10	Metal Tech/Binks Spray Booth Serial No. 34108 (Spray Booth 60)	December, 1992	None
11	Metal Tech/Binks Spray Booth Serial No. 246742 (Spray Booth 60)	October, 1992	None
12	Metal Tech/Binks Spray Booth Serial No. 31333 (Spray Booth 60)	May, 1993	None
13	Metal Tech/Binks Spray Booth Serial No. 28219558 (Spray Booth 16)	August, 1984	None
14	Metal Tech/Binks Spray Booth Serial No. 246741 (Spray Booth 60)	December, 1992	None
20	Metal Tech/Binks Spray Booth Serial No. 495309691 (Spray Booth 220)	September, 1996	None
21	Metal Tech/Binks Spray Booth Serial No. 495309692 (Spray Booth 220)	September, 1996	None
22	Metal Tech/Binks Spray Booth Serial No. M1 (Spray Booth 220)	April, 1994	None
23	Metal Tech/Binks Spray Booth Serial No. 693297792 (Spray Booth 220)	May, 1993	None
24	Metal Tech/Binks Spray Booth Serial No. 1292294261 (Spray Booth 220)	May, 1993	None
25	Thierica Mfg. Spray Booth (New Spray Booth 25)	March, 2001	None
26	Metal Tech/Binks Spray Booth Serial No. 1292294262 (Spray Booth)	December, 1992	None
27	Metal Tech/Binks Spray Booth Serial No. 49228740 (Spray Booth B/G 204)	October, 1992	None
28	Metal Tech/Binks Spray Booth Serial No. 59027356 (Spray Booth B/G 168)	June, 1989	None
29	Metal Tech/Binks Spray Booth Serial No. 59027357 (Spray Booth 220)	April, 1994	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

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

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

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

b. The emission of smoke or other particulate matter from any emission unit shall not exceed an opacity of greater than 30 percent, except that an opacity of greater than 30 percent but less than 60 percent shall be allowed for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 feet) radius from the center point of any other such emission unit owned or operated by the Permittee, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period, pursuant to 35 IAC 212.123 and 212.124.

5.2.3 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 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO_x)	--
Particulate Matter (PM)	--
Sulfur Dioxide (SO_2)	--
Volatile Organic Material (VOM)	130.3

HAP, not included in VOM or PM	--
TOTAL	130.3

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

a. The annual emissions of VOM from the source, shall not exceed 135.8 tons/year.

b. This limit is based on the maximum allowable VOM emissions for the emission units (including the "Group I" paint spray booths) at the source constructed prior to November 15, 1992 (99.9 tons/year) plus increases in VOM emissions of 11.0 tons/year for the construction of the eight "Group II" paint spray booths, which were constructed on or after November 15, 1992 and prior to October 1, 1993, 10.685 tons/year for the construction of the five "Group III" Paint Booths, which were constructed on or after October 1, 1993 and prior to January 1, 1997, and 14.215 tons/year for the modification of the five "Group III" or Multi-Color paint spray booths pursuant to Construction permit 98100019. This limit ensures that the construction of these emission units does not constitute a new major source or major modification pursuant to 35 IAC Part 203. See also Condition 7.1.6 [T1].

c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

N/A

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 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 further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, 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 during initial issuance of the sources’ CAAPP permits. These allotments are established from historical VOM emissions or “baseline emissions” lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An 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 account database. The Illinois EPA will then retire ATUs in sources’ accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its 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 emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 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 (35 IAC 205.710). Sources may also transfer or sell the ATUs that they holds to other sources or participants [35 IAC 205.630].

6.2 Applicability

This source is considered a “participating source” for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to “emissions excursion compensation,” as described in Condition 6.4.

i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source’s next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance

with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and

ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Agency;

v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit

compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 213 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 24.1250tons.

This determination includes adjustment to actual emissions to account for noncompliance at the source, (e.g., construction of 13 spray booths since November 15, 1992 without first obtaining any Construction Permits and not addressing the requirements of 35 IAC Part 203, Major Stationary Source Construction and Modification) pursuant to 35 IAC 205.320(d) as further addressed in Conditions 5.5.3 and 7.1.6 of this permit.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments
(Pending construction)

There are no contingent allotments for this source.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

a. Seasonal component of the Annual Emission Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units, if satisfying Condition 6.11(a)(i), (a)(ii), or (a)(iii) (see also 35 IAC 205.405(a)(1), (a)(2), or (a)(3)) prior to May

1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy Condition 6.11(a)(i), (a)(ii), or (a)(iii) (see also 35 IAC 205.405(a)(1), (a)(2), or (a)(3)) [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and

iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

None

b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Units PD Paint Department

7.1.1 Description

After plastic resin pellets have been shaped by injection molding machines, the parts are cleaned of any flash material, spurs, gates, or burrs. These plastic parts will become small knobs, switches, and dial faces for automobile assemblies. The faces of these small plastic parts are painted using any of the source's twenty paint spray booths and then prepared for laser etching and/or pad printing of letters and symbols. The source's processes after the coating is applied to the plastic part involves a laser etching process in which letters, numbers, and dial faces are "burned" into the coating by laser energy. The portion of the coating which is contacted by the laser beam is vaporized, and the resulting pattern can be seen in the coating. In some cases, a colored "prime" coat is put on the plastic part, then overcoated with a black coating. The black coating is formulated to be able to adhere to the plastic part despite the input of the laser energy. Together, the two coatings are expected to adhere to each other, withstanding the strong tendency of the laser beam to separate them.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
1	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #1)	None
2	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #2)	None
4	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #4)	None
5	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #5)	None
6	Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #6)	None
10	Metal Tech/Binks Spray Booth Serial No. 34108 (Spray Booth 60)	None
11	Metal Tech/Binks Spray Booth Serial No. 246742 (Spray Booth 60)	None
12	Metal Tech/Binks Spray Booth Serial No. 31333 (Spray Booth 60)	None
13	Metal Tech/Binks Spray Booth Serial	None

Emission Unit	Description	Emission Control Equipment
	No. 28219558 (Spray Booth 16)	
14	Metal Tech/Binks Spray Booth Serial No. 246741 (Spray Booth 60)	None
20	Metal Tech/Binks Spray Booth Serial No. 495309691 (Spray Booth 220)	None
21	Metal Tech/Binks Spray Booth Serial No. 495309692 (Spray Booth 220)	None
22	Metal Tech/Binks Spray Booth Serial No. M1 (Spray Booth 220)	None
23	Metal Tech/Binks Manual Spray Booth Serial No. 693297792 (Spray Booth 220)	None
24	Metal Tech/Binks Spray Booth Serial No. 1292294261 (Spray Booth 220)	None
25	Thierica Mfg. Spray Booth (New Spray Booth 25)	None
26	Metal Tech/Binks Spray Booth Serial No. 1292294262 (Spray Booth)	None
27	Metal Tech/Binks Spray Booth Serial No. 49228740 (Spray Booth B/G 204)	None
28	Metal Tech/Binks Spray Booth Serial No. 59027356 (Spray Booth B/G 168)	None
29	Metal Tech/Binks Spray Booth Serial No. 59027357 (Spray Booth 220)	None

7.1.3 Applicability Provisions and Applicable Regulations

a. Each spray booth is an “affected coating line” for the purpose of these unit-specific conditions.

b. Each affected coating line is subject to the emission limits identified in Condition 5.2.2.

c. The affected coating lines are subject to 35 IAC 212.321(a), which provides that:

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, 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 1) [35 IAC 212.321(a)].

ii. Because the expected process weight rate for each affected coating line is less than 100 pounds per hour, the allowable PM emission rate for each affected coating lines set by 35 IAC 212.321 is 0.55 pounds per hour.

d. Pursuant to 35 IAC 218.204, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. The emission limitations are as follows:

i. Plastic Parts Coating: Automotive/Transportation/Specialty/Black Coatings, Reflective Argent Coatings, Air Bag Cover Coatings, and Soft Coatings [35 IAC 218.204(n)(3)(B)]:

kg/l	lb/gal
0.71	5.9

ii. Plastic Parts Coating: Automotive/Transportation/Specialty/Stencil Coatings, Adhesion Promoters, Ink Pad Coatings, Electrostatic Prep Coatings, and Resist Coatings [35 IAC 218.204(n)(3)(D)]:

kg/l	lb/gal
0.82	6.8

7.1.4 Non-Applicability of Regulations of Concern

a. The affected coating line is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

b. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating

line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.1.5 Operational and Production Limits and Work Practices

None

7.1.6 Emission Limitations

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

a. i. The total emissions of VOM from the seven "Group I" coating lines, which were constructed prior to November 15, 1992 (Manual Spray Booth #2, Manual Spray Booth #4, Manual Spray Booth #5, Manual Spray Booth #6, Spray Booth 16, Spray Booth B/G 168, and Spray Booth B/G 204), shall not exceed 99.9 tons/year, combined. Compliance shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

ii. The above limitations were established in Permit 98100019, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. Emissions and operation of the eight "Group II" paint spray booths, which were constructed on or after November 15, 1992 and prior to October 1, 1993 (Manual Spray Booth #1, Spray Booth Serial No. 1292294262, Spray Booth 60 Serial No. 34108, Spray Booth 60 Serial No. 246741, Spray Booth 220 Serial No. 693297792, Spray Booth 220 Serial No. 1292294261, and Spray Booth 60 Serial No. 31333), shall not exceed the following limits:

Material	Material Usage (gal/mo)	Material Usage (gal/yr)	VOM Content (lb/gal)	Overall Minimum VOM Recovered (% by Wt)	VOM Emissions (lb/mo)	VOM Emissions (Ton/yr)
Coating	311.00	3,727	5.90	--	1,833.00	11.00
Cleanup	333.33	4,000	7.00	90	233.33	1.40

Solvent

Total 12.40

i. These limits are based on representations of the maximum actual emissions based on the maximum material usage, the maximum VOM contents of these materials, and a minimum amount of VOM recovered from the waste cleanup solvent (90% by weight). (Note: The VOM content limitation includes water and exempt compounds.) Compliance shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

ii. The above limitations were established in Permit 98100019, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

c. Emissions from the "Group III" or Multi-Color paint booths (Booth 60 Serial No. 246742, Booth 220 Serial No. M1, Booth 220 Serial No. 495309691, Booth 220 Serial No. 495309692, Booth Serial No. 59027357, and New Booth 25) shall not exceed the following limits:

i. Emissions of volatile organic material (VOM)

Ton/month	Ton/year
3.6	21.4

ii. Emissions of PM from New Booth 25 shall not exceed 0.55 pounds per hour and 2.41 tons per year.

iii. Compliance with these limits shall be determined from a running total of 365 days of data.

iv. The above limitations were established in Permit 00100070, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention

of Significant Deterioration (PSD), 40 CFR 52.21 and 35 IAC Part 203 [T1].

v. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the CAA from the New Booth 25 shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions from the New Booth 25 not triggering the requirements of Section 112(g) of the CAA.

7.1.7 Testing Requirements

a. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under Condition 7.1.9(b) (see also 35 IAC 218.211) 35 IAC 218.211(a).

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected coating line 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(b) directly reflect the application of such material and separately account for any additions of solvent.

c. i. Upon written request from the Illinois EPA, pursuant to 35 IAC 201.282 and Section 39.5(7)(b) of the Act, tests shall be performed which will allow evaluation of the waste coatings and solvents in order to determine compliance with the requirements of Condition 7.1.6.

ii. These tests shall be performed by an approved independent laboratory. USEPA Method 24 shall

be used for testing of waste coatings and solvents. Refer to 40 CFR 60, Appendix A for USEPA test methods.

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 5.5.1, 7.1.3, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.1.7, 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.

b. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected 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 the affected coating lines; and

   ii. 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 lines.

c. Records of the coating usage for the "Group I" and "Group II" coating lines, gal/mo and gal/yr;

d. Records of the coating usage for the "Group III" coating lines, gal/day, gal/mo and gal/yr;

e. The VOM content of coatings applied on each affected coating line, % by Wt;

f. Density of coatings applied on each coating line, lb/gal;

g. The VOM content of the coatings applied on the "Group II" coating lines including water and exempt compounds, lb/gal;

h. Records of the cleanup solvent added to the "Group I" and "Group II" coating lines, gal/mo and gal/yr;

i. Records of the cleanup solvent added to the"Group III" coating lines, gal/day, gal/mo and gal/yr;

j. Records of the cleanup solvent recovered from the "Group I" and "Group II" coating lines, gal/mo and gal/yr;

k. Records of the cleanup solvent recovered from the "Group III" coating lines, gal/day, gal/mo and gal/yr;

l. The operating schedule of the affected coating lines;

m. The monthly and aggregate annual PM emissions from the affected coating lines based on the material usage and operating schedule, with supporting calculations;

n. The monthly and aggregate annual VOM emissions from the "Group I" and "Group II" coating lines based on the material usage, with supporting calculations; and

o. The daily, monthly, and aggregate annual VOM emissions from the "Group III" coating lines based on the material usage, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected coating line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(d) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.

b. Emissions of particulate matter in excess of limits in Condition 7.1.3(c) within 30 days of such an occurrence.

c. Emissions of VOM in excess of the limits in Conditions 7.1.6(a), (b), and/or (c) within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

a. To determine compliance with Conditions 5.5.1, 7.1.3(c) and 7.1.6, PM and VOM emissions from the affected coating lines shall be calculated based on the following:

i. Particulate Matter Emissions:

PM (lb) = (Coating Usage, gal) x (Coating Density, lb/gal) x (Wt % Solids) x [1 - (Transfer Efficiency* (%)/100)]

*As specified by manufacturer or vendor of the spray booths and paint booth filters

ii. Volatile Organic Material Emissions:

VOM (lb) = (Coating Usage, gal) x (Coating Density, lb/gal) x (VOM Content of Coating, % by Wt.) + (Cleaning Solvent Usage, gal) x (Cleaning Solvent Density, lb/gal) x [1 - (Cleaning Solvent Recovery**(%)/100)]

**As specified by testing pursuant to Condition 7.1.7(c).

b. Compliance with Condition 7.1.6(c) shall be based on the recordkeeping for the "Group III" coating lines and estimations of VOM emissions using the emission factors and formulas listed Condition 7.1.12(a)(ii).

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 November 28, 1998 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA,

emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and 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 [Section 39.5(12)(a) of the Act]. This notice shall:

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. 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;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1

July - December	March 1

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

8.6.2 Test Notifications

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

a. The name and identification of the affected unit(s);

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

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section (MC 11)

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to comply with Title I requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

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

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

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(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

   ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; 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.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

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

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

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

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay

any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

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

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

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Emissions of Particulate Matter from New Process Emission Units

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

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, 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)].

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

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

Where:

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

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

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

ii. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

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

10.2 Attachment 2 Net VOM Emissions Increase Determination

Table 1

Contemporaneous VOM Increases

Emission Unit	Permit	VOM (Ton/yr)
"Group III" Coating Lines	96090107	11.8346*
"Group III" Coating Lines Modification	98100019	13.0651**
	Total	24.9

Table 2

Contemporaneous VOM Decreases

Emission Unit	Permit	VOM (Ton/yr)

There have been no contemporaneous VOM decreases at this source.

Table 3

Net VOM Emission Increase

	VOM (Ton/yr)
Contemporaneous Increases	24.9
Contemporaneous Decrease	0.0
	24.9

* Based upon the actual VOM emissions from the "Group III" coating lines averaged over the last two years (October, 1996 - September 1998).

** Difference between the VOM limit in Special Condition No. 6(a) and the actual VOM emissions from the "Group III" coating lines averaged over the last two years (24.9 tons/yr - 11.8346 tons/yr = 13.0651 tons/yr).

10.3 Attachment 3 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: _____

RWB:jar