217/782-2113

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

PERMITTEE

The Knapheide Manufacturing Co.
Attn: Bernie Ott
Post Office Box 7140
Quincy, Illinois 62305-7140

I.D. No.: 001806AAT
Application No.: 98090055

Date Received: February 23, 2004
Date Issued: July 20, 2004
Expiration Date[1]: July 20, 2009

Operation of: The Knapheide Manufacturing Co., Manufacturing of Truck Equipment
Source Location: 3109 North 30th Street, Quincy, Adams County, 62305-7140
Responsible Official: Harold E. Marcionetti, Senior V.P. of Operations

This permit is hereby granted to the above-designated Permittee to operate a truck equipment manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: May 16, 2005
Revision Date Issued: **TO BE DETERMINED**
Purpose of Revision: Significant Modification

This significant modification clarifies that the source is considered minor for HAP emissions and to revise a prior solvent limitation.

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

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

ECB:RWC:psj

cc: Illinois EPA, FOS Region 2
CES
Lotus Notes

1 Except as provided in Conditions 1.5 and 8.8 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

The Knapheide Manufacturing Co.
Post Office Box 7140
Quincy, Illinois 62305-7140
217/222-7131

I.D. No.: 001806AAT
Standard Industrial Classification: 3713, Truck and Bus Bodies

1.2 Owner/Parent Company

The Knapheide Manufacturing Co.
Post Office Box 7140
Quincy, Illinois 62305-7140

1.3 Operator

The Knapheide Manufacturing Co.
Post Office Box 7140
Quincy, Illinois 62305-7140

Contact Person's Name
Bernie Ott, Environmental Engineer
217/222-7131

1.4 General Source Description

The Knapheide Manufacturing Co. principal manufacturing operation is located at 3109 North 30th Street in Quincy. A secondary operation (site) is located at 436 South 6th Street. The source fabricates truck equipment accessories and the principal pollutant emitting process is coating of the parts, which result in VOM emissions.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.8.)

a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued

for this source, which conditions are specifically designated as “T1.”

b. This permit contains Title I conditions that revise Title I requirements established in permits previously issued for this source, which conditions are specifically designated as “T1R.”

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
ft^3	cubic feet
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kW	kilowatts
lb	pound
m	million
mmBtu	Million British thermal units
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
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I B identifies Title I conditions that have been carried over from an existing permitT1NTitle I New B identifies Title I conditions that are being established in this permit
T1R	Title I Revised B 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
wt. %	weight percent
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:

Nine make-up air units, 3.025 mmBtu/hr, each
One make-up air unit, 3.0 mmBtu/hr
E-Coat Resin Storage Tank
Boiler for E-Coat
Welding
Metal forming process such as shearing, milling, punching, forming and grinding
Controlled pyrolysis cleaning machine
Wood saw and drill. Unit has cyclone/baghouse but emissions would be under 1.0 lb/hr without control. Control vents indoors.

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)].

Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or blended contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

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

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

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

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type

addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
PB-1	Paint Booth 1 with Flash Tunnel and Furnace	1997	Filter
PB-2	Paint Booth 2 with Flash Tunnel and Bake Oven	1997	Filter
PB-3	Paint Booth 3 with Bake Oven	1997	Filter
PB-4	Paint Booth 4	1997	Filter
PB-5	Paint Booth 5 with Bake Oven	1997	Filter
Tool Box PB	Tool Box Paint Operation Consisting of Prime Spray Booth, Topcoat Spray Booth, Two Flash Tunnels and a Bake Oven	1998	Filters on Prime and Topcoat Spray Booth
E-Coat	Electrocoat Line Including Stages for Cleaning and a Bake Oven	1997	None
HW	Hand Wiping	1997	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.

5.2 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 expected based on the lack of material handling and storage activity and the overall low PM emission rate.

b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Ozone Depleting Substances

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

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 Future Regulations

a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. 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.

5.2.6.1 None

5.2.6.2 None

5.2.7 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

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

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

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

5.2.8 PM_{10} Contingency Measure Plan

Should this stationary source, as defined in 35 IAC 212.700, become subject to the requirement to prepare and submit a contingency measure plan reflecting the PM10 emission reductions as set forth in 35 IAC 212.703, then the owner or operator 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 in accordance with 35 IAC 212.704. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U, incorporated herein by reference.

5.3 Non-Applicability of Regulations of Concern

This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source does not have a pollutant-specific emissions unit that uses an add-on control device to achieve compliance with an emission limitation or standard.

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	159.70
Sulfur Dioxide (SO_2)	0.06
Particulate Matter (PM)	5.05
Nitrogen Oxides (NO_x)	8.97
HAP, not included in VOM or PM	
Total	173.8

5.5.2 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 and the requirements of 40 CFR Part 63, Subpart MMMM, National Emission Standards for Surface Coating of Miscellaneous Metal Part and Products (MMPP) and 40 CFR Part 63, Subpart PPP, National Emission Standards for Surface Coating of Plastic Parts and Products (PPP), do not apply to the source. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.10.2, 5.11.1, and 5.7.2.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 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.

5.7 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.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating HAP Emissions

For the purpose of estimating HAP emissions from equipment at the source, the weight percent of each HAP for each product times the VOM emissions contributed by that product is acceptable.

5.10 Source-Wide Testing Requirements

5.10.1 General Procedures for Calculating HAP Emissions

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.

5.10.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.10.1 and to verify compliance with the requirements of Condition 5.5.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:

   Test the top five coatings and solvents that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.

b. Testing may be conducted by the supplier of the HAP-containing material.

c. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.11.1 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.

d. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.11 Source-Wide Recordkeeping Requirements

5.11.1 Records for HAP Emissions

a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.5.2, pursuant to Section 39.5(7)(b) of the Act.

b. If testing is required by Condition 5.10.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.11.1(c) below.

c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each coating, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.10.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 - 3%) then the highest value shall be used.

d. The Permittee shall keep a record of the applicability determination for 40 CFR 63, Subpart MMM, National Emission Standards for Surface Coating of Miscellaneous Metal Part and Products (MMPP) and 40 CFR Part 63, Subpart PPP, National Emission Standards for Surface Coating of Plastic Parts and Products (PPP) at the source for a period of five years after the determination. This determination shall include a detailed analysis that demonstrates why the Permittee believes the source is not subject to 40 CFR 63, Subpart MMM, National Emission Standards for Surface Coating of Miscellaneous Metal Part and Products (MMPP) and 40 CFR Part 63, Subpart PPP, National Emission Standards for Surface Coating of Plastic Parts and Products (PPP) [40 CFR 63.10(b)(3)].

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Cleaning and Coating Operations
Control: Filters

7.1.1 Description

The coating process generally consists of cleaning, prime coating/curing and then top coating/curing. The E-coat line consists of various stages in which cleaning is first done, then a rinse and finally the actual electrocoat primer followed by curing. Since the whole line is a dip process, no PM is generated. Some parts that are too large for the dip tanks are spray primed. The topcoat booths are spray operations and do emit PM. Paint booths 4 and 5 use the same bake oven. All of the coated materials are exposed to outdoor weather and thus qualify as using an extreme performance coating.

The E-coat bake oven is capable of generating glycol ethers during the curing process that are not part of the original E-coat raw material.

Purge or "gun cleaning" solvents are used to clean out lines during color changes.

Tool box manufacturing including coating is at the secondary site.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
PB-1	Paint Booth 1 with Flash Tunnel and Furnace Part/Coating/Type: Utility Body Undercoating and Prime Spray	Filter
PB-2	Paint Booth 2 with Flash Tunnel and Bake Oven Part/Coating/Type: Side Assembly Top Coat Spray	Filter
PB-3	Paint Booth 3 and Bake Oven Part/Coating/Type: Utility Body Topcoat, Spray	Filter
PB-4	Paint Booth 4 Part/Coating/Type: Platform Undercoat and Topcoat, Spray	Filter
PB-5	Paint Booth 5 Uses Same Bake Oven as PB-4 Part/Coating/Type: Large Product Prime Coat and Utility Body & Miscellaneous Topcoat, Spray	Filter

Emission Unit	Description	Emission Control Equipment
Tool Box PB	Tool Box Paint Operation Consisting of Prime Spray Booth, Topcoat Spray Booth, Two Flash Tunnels and a Bake Oven	Filters on Prime and Topcoat Spray Booth
E-Coat	Electrocoat Line Including Stages for Cleaning and a Bake Oven Part/Coating/Type: Cleaning and Prime Coat for Most Parts, Dip Tank	None
HW	Hand Wiping	None

7.1.3 Applicability Provisions and Applicable Regulations

a. An "affected coating line" for the purpose of these unit specific conditions, is a coating operation that includes a spray booth and drying oven or electrocoat dip tank and drying oven which is used to apply coating to a metal substrate. As of the "date issued" as shown on page 1 of this permit, the affected coating lines are identified in Condition 7.1.2.

b. Each affected coating line is subject to the 35 IAC 212.321(a), which requires 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 [35 IAC 212.321(a)].

The emissions of particulate matter into the atmosphere in any one hour period from each of 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 in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

Note that for a process weight rate below 100 lb/hour (0.05 tons/hour) the allowable is 0.55 lb/hour. For coating operations the process weight rate is the weight of the coating only; it does not include the weight of the steel product [35 IAC 266.110].

c. Each affected coating line at the source is subject to 35 IAC 215.204(j)(3) for extreme performance coatings which provides that:

i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating 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:

kg/liter	lbs/gallon
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 cleaning stages of the E-coat line and the hand wiping with cleaning solvent operation are both subject to 35 IAC 215.301. This rule states that no person shall cause or allow the discharge of more than 8 lb/hr of a photochemically reactive organic material into the atmosphere from any emission unit 935 IAC 218.301). The exception cited by the rule does not apply to the Permittee, since the Permittee does not have VOM emission control equipment.

7.1.4 Non-Applicability of Regulations of Concern

a. Each affected coating line is not subject to 35 IAC 215.301, Use of Organic Material, pursuant to 35 IAC 215.209, Exemption From General Rule on Use of Organic Material which excludes affected coating lines from this requirement.

b. The affected coating lines are not subject to 40 CFR Part 63, Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of

Miscellaneous Metal Parts and Products, because the affected coating lines are not located at a major source of HAP emissions that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year, pursuant to [40 CFR 63.3881(b)].

c. The affected coating lines are not subject to 40 CFR Part 63, Subpart PPPP—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, because the affected coating lines are not located at a major source of HAP emissions that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year, pursuant to [40 CFR 63.4481(b)].

7.1.5 Operational and Production Limits and Work Practices

The Permittee shall operate in accordance with the following requirements pursuant to Section 39.5(7)(a) of the Act:

a. The drying ovens shall only be operated with natural gas as the fuel.

b. i. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.

ii. An adequate inventory of spare filters shall be maintained.

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 line is subject to the following pursuant to Section 39.5(7)(a) of the Act:

a. Usages of coating on a "water excluded" and "as applied" basis, VOM content of coatings (water excluded) and VOM emissions shall not exceed the following [T1R]:

	Usage		VOM Content	VOM Emissions	
Type	(Gal/Mo)	(Gal/Yr)	(Lb/Gal)	(Ton/Mo)	(Ton/Yr)
Spray	8,400	70,000	3.0[a]	12.6	105.0
E-Coat	7,000	60,000	1.0[b]	3.5	30.0

[a] Annual average of all spray coatings for calculating annual emissions. For determining compliance with Condition 7.1.3(c) the allowable is 3.5.

[b] Annual average of all E-coat coatings for calculating annual emissions. For determining compliance with Condition 7.1.3(c) the allowable is 3.5.

b. Usage of hand wiping solvent and VOM emissions shall not exceed the following [T1R]:

Usage		VOM Emissions	
(Ton/Mo)	(Ton/Yr)	(Ton/Mo)	(Ton/Yr)
0.6	5.3	0.6	5.3

The usage rate was based on the solvent being 100% VOM. If a solvent is used that is not 100% VOM, the usage may be calculated as total weight used times weight percent VOM.

c. Usage of E-coat cleaning agent and VOM emissions shall not exceed the following [T1R]:

Usage		VOM Emissions	
(Ton/Mo)	(Ton/Yr)	(Ton/Mo)	(Ton/Yr)
0.4	3.2	0.4	3.2

The usage rate was based on the E-coat cleaning agent being 100% VOM. If a cleaning agent is used that is not 100% VOM, the usage may be calculated as total weight used times weight percent VOM. For instance, the VOM content of the cleaning agent at the time of submittal of the original application was 3.2 weight percent so 9.3 tons/month of cleaning agent may be used. The VOM may be emitted in either Stage 1 or Stage 2 of the cleaning process.

d. Usage of purge or gun cleaning solvent and VOM emissions shall not exceed the following [T1R]:

VOM Emissions[a] (Ton/quarter)	VOM Emissions[b] (Ton/Yr)
4.05	16.2

[a] Solvent is a combination of fresh material that is 100% methyl ethyl ketone (MEK) and material returned from recycler which includes

some of the coating solvent from the previous shipment. Usage is total of both.

[b] The calculation was based on a 25% loss factor. There is no VOM emission limit per month because amount recycled can vary significantly. There could be two shipments in one month and none in others. Calculated emissions could actually be negative for some months due to two shipments and also the flushed out coating is counted as solvent recycle when it is in reality coating recycle.

e. These values are based on usages presented in the application and for coatings the VOM content allowed pursuant to Condition 7.1.3(c).

f. 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). The months do not have to be calendar months. The Permittee's "accounting" months consisting of 4, 4 and 5 week periods are acceptable.

g. The above limitations contain revisions to previously issued Permit 95110091. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically MSSCAM and/or PSD. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the Knapheide Manufacturing Co. is now using a lower VOC content custom blended gun cleaning solvent, and for operational reasons requested to remove the gallon per month limitation. The gallon per month usage limit has been removed in 7.1.6(d) for the purge/gun cleaning solvent and replaced with a quarterly VOC mass limit for no change in emissions.

7.1.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 215.105(a), 215.211(a), and Section 39.5(7)(b) of the Act]:

a. On an annual basis for currently used coating, upon addition of a new coating or upon a reasonable written request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105(a), 215.208, and 215.211(a).

   i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105(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(a) and (b) directly reflect the application of such material and separately account for any additions of solvent.

   [35 IAC 215.105(a), 215.208, and 215.211(a)]

b. The Permittee may use emission factors for HAP emission from the E-coat bake oven as supplied by the E-coat manufacturer as these HAPs are reportedly formed during the baking process and cannot be determined by an analysis of the coating in the dip tank. The currently promulgated emission factors are stated in Condition 7.1.12(d) but may be modified by the supplier.

c. i. Unused waste materials (e.g. obsolete coating colors) in unopened containers may be assumed to have the same composition as when originally received and do not have to be tested for VOM content.

   ii. Other materials, such as E-coat cleaning agent, that are periodically drained must have the VOM content determined according to USEPA Test Methods, Physical/Chemical Methods (SW-846), Test Method 8260 or equivalent.

iii. If after three analyses of waste E-coat cleaning agent material is performed, a consistent value is obtained (e.g. 1-2% VOM), and the credit for waste is less than 4 tons per year, further analyses do not have to be performed for the remainder of that 12-month period unless a written request is made by the Illinois EPA. Analyses shall be performed again in one year.

iv. An analysis must also be performed on purge/gun cleaning solvent that is sent for recycling. This analysis may be performed by the recycling agent that recovers the solvent and returns it to the Permittee. If the Permittee's material is isolated, i.e. not mixed with other coaters materials, the amount may be determined by a material balance and an analysis need not be performed. For example, if 3,500 pounds of contaminated solvent is sent to the recycler where the solvent is distilled off, 750 pounds of solids remain after distillation and 2,700 pounds are returned, the 2,700 pounds is considered the amount recycled. Distillation losses would have to be considered as the Permittee's emission losses. The Permittee may also use the lowest VOM content of any of the coatings and gun cleaner used as the VOM content of the recycle material. There is no specific rule limit for this process, only a permit limit based on expected usage.

7.1.8 Inspection Requirements

The Permittee shall operate in accordance with the following requirements pursuant to Section 39.5(7)(a) of the Act:

The Permittee shall visually inspect the filters and check for air flow drop on a regular basis in order to ensure proper operation of the filters and the need for replacement.

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for all coating lines combined to demonstrate compliance with Conditions of this section, pursuant to Section 39.5(7)(b) of the Act:

a. i. The name and identification number of each coating as applied on the affected coating lines;

ii. The usage of each coating, in units of gallons/month and gallons/year.

iii. 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 month on all of the affected coating lines.

b. i. The name and identification number of each cleaning agent used in the E-coat cleaning stages, of each solvent used for hand wiping, and of each purge solvent used for gun cleaning.

ii. The usage of each E-coat cleaning agent, hand wiping solvent and purge solvent, in units of tons/month and tons/year.[1]

iii. The weight of VOM per pound of each E-coat cleaning agent, wiping solvent and purge solvent used in the E-coat cleaning and hand wiping processes.

iv. Weight of waste solvent sent offsite for recycle and calculation of the VOM content by analysis or material balance.

c. VOM emissions from the E-coat cleaning, wiping and coating processes as calculated from the information in Condition 7.1.9(a) and (b) and the calculation method in Condition 7.1.12.

d. Records of the testing of VOM and HAP content (wt. %) of each coating, E-coat cleaning agent, and waste 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; and

iii. Documentation of analysis methodology.

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[1] Since the maximum expected emission rate from Stage 1 and Stage 2 of the E-coat line, which emit VOM while cleaning the metal, are less than 1.0 lb/hr, records do not have to be kept demonstrating hourly usage or emission rate to verify compliance with Condition 7.1.3(d). Only monthly values are required. The records may be kept on a volume basis rather than weight basis provided that the density is known for conversion purposes.

e. Wiping solvents do not have to be tested if an assumption of 100% VOM is used. The density from an MSDS may be used for lb/gal.

f. Records of all mixing operations in which one material has a VOM content greater than 3.5 lb/gal, e.g. addition of hardener and reducer/thinner to a coating. Records must include a calculation of post-mixing VOM content or a chart can be prepared demonstrating a maximum amount of thinner than can be added in order for the VOM content to remain below 3.5 lb/gal. If the chart is used the records must show that the mix ratio is less than the chart value. Records are not required of the mix ratio when mixing components for which all are below 3.5 lb VOM/gal. Records are not required for the addition of water, or VOM exempt compounds.

g. Results of filter inspections and dates the replacements were made.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected coating lines 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:

Any record showing a violation of Condition 7.1.3(c), 7.1.6 or an exceedance of Condition 5.5.1 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation. If a violation is discovered at the end of the month when calculations or review of materials used is performed, the violation is considered to have occurred at the end of the month and the Permittee has 30 days from that date to submit the report.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to affected coating lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee’s obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that

the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Condition 5.5.1 are not exceeded and the affected coating lines remain in compliance, with the VOM content requirements.

7.1.12 Compliance Procedures

a. For each coating:

VOM Emissions (lb/mo) = Volume of Coating (gal/mo)[1] x VOM Content (lb/gal)[1]

b. For each E-coat cleaning agent:

VOM Emissions (lb/mo) = Volume of E-Coat Cleaning Agent (gal/mo)[1] x VOM Content (lb/gal)[1] - Credit for VOM in waste as calculated by f below

c. For wiping solvent:

VOM Emissions (lb/mo) = Volume of Wiping Solvent (gal/mo) x Density (lb/gal)

d. For HAPs generated by E-coat bake oven:

HAPs [2] (lb/mo) = Resin Usage (gal/mo) x 0.62 lb/gal + Paste Usage (gal/mo) x 1.10 lb/gal

e. For gun cleaning (purge) solvent:

VOM Emissions (lb/mo) = Volume of Purge Solvent (gal/mo) x Density (lb/gal) - Credit for VOM in waste as calculated by f below

f. Credit for VOM in waste:

VOM Credit (lb/mo) = VOM Waste Sent Offsite (lb/mo) x VOM Content of Waste (wt. %)[3]

g. Total VOM (lb/mo) = VOM from all coatings combined + VOM from all E-Coat Cleaning Agents Combined + VOM from All Wiping Solvents Combined + VOM from Purge Solvent + HAPs Generated in E-coat Bake Oven That Are Also VOMs - Credit from VOM in Waste

h. PM emissions for each spray booth:

PM Emissions (lb/mo) = 0.0003 grains/ft^3 [4] x Air Flow Rate (ft^3/min) x 60 min/hour x hours of operation ÷ 7000 grains/lb

i. Compliance with Condition 7.1.3(b) may be assumed by proper operation and replacement of filters as needed.

j. Combustion emissions from bake ovens for paint booth 1 through 3 and E-coat:

Fuel combustion emissions from the affected ovens shall be calculated based on the following emission factors:

Pollutant	Emission Factor (Lb/Mft^3)
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 - <10 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, 5th Edition, March 1998. VOM emission factor based on TOC factor corrected for 52% methane contribution.

Oven Emissions (lb) = (Natural Gas Consumed, Mft^3) x (The Appropriate Emission Factor, lb/Mft^3)

[1] Minus water and exempt compounds.

[2] Also a VOM.

[3] An alternative material balance approach by the recycler and another approach as described in Condition 7.1.7(c)(iv) may also be used.

[4] Average typical calculated outlet grain load.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____Error! Bookmark not defined. (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

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

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

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

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

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

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

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

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

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

8.6.3 Test Reports

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

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

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

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to

the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

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

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

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

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

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

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

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

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

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

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

RWC:psj

10.2 Attachment 2 - Guidance on Revising This Permit

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

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

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

1. Administrative Permit Amendment

- Corrects typographical errors;

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

- Requires more frequent monitoring or reporting by the Permittee;

- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;

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

- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

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

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

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

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

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

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

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

- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

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

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;

- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

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

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

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

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

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

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

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

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

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

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

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

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

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

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

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

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

Signature Block	
	This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature: BY: _____ AUTHORIZED SIGNATURE _____ TITLE OF SIGNATORY _____ TYPED OR PRINTED NAME OF SIGNATORY _____ / _____ / _____ DATE

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

10.4 Attachment 4 - Guidance on Renewing This Permit

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

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

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

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

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

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

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

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

7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

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

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

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

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

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

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

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

Mail renewal applications to:

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

RWC:psj