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1.0 SOURCE IDENTIFICATION

1.1 Source

Intermatic Incorporated
7777 Winn Road
Spring Grove, Illinois 60081
815/675-2321

I.D. No.: 111080AAC
Standard Industrial Classification: 3999, Miscellaneous
Manufacturing

1.2 Owner/Parent Company

Intermatic Incorporated
7777 Winn Road
Spring Grove, Illinois 60081

1.3 Operator

Intermatic Incorporated
7777 Winn Road
Spring Grove, Illinois 60081

Ralph Tassone
815/675-2321

1.4 General Source Description

Intermatic Incorporated is located at 7777 Winn Road in Spring Grove. The source manufactures miscellaneous items such as low voltage lighting, professional lighting, photo controllers, surge suppressor strips, and electro-mechanical and electronic timers for consumer and industrial use. Raw materials, such as plastic, steel, brass, and aluminum, are ultimately manufactured into parts for sub assembly and final assembly. The source's products are manufactured through molding, punch presses, and screw machine departments. Some molded parts are sent directly to sub assembly. Others are silk screened prior to being sent to sub assembly. Punch press parts are either degreased or powder coated prior to sent to sub assembly. Automatic screw machine parts are cleaned or degreased prior to sub assembly. From sub assembly, parts go to final assembly and ultimately to warehousing for shipment to the source's customers.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
ACMA	Alternative Compliance Market Account
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
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic foot
gal	gallon
HAP	Hazardous Air Pollutants
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
l	liter
lb	pound
Mft ³	Million cubic feet
Mg	Metric Tonnes or Megagrams
mmBtu	Million Btus
mo	month
MW	Megawatts
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
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Ton
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TOC	Total Organic Compounds

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:

Gas Fired Infra-Red Heaters
Silk Screen Printers
Pad Printers
Batch Oven

- 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:

Punch Presses
Screw Machines
Maintenance Tool Room with Cyclone

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

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

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

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
Boiler #1	Cleaver Brooks Model CB200-400 Natural-Gas Fired Boiler (Boiler #1, 16.738 mmBtu/hr)	1977	None
Boiler #2	American International Model AC7865 Natural Gas-Fired Boiler (Boiler #2, 14.500 mmBtu/hr)	1972	None
DETREX	DETREX Model #2DCRS-650-1VBS Vapor Degreaser	August, 1973	AEI Odorkleen Carbon Adsorption System
KORD	Heidelberg Model KORD Sheet-Fed Offset Printing Press	Unknown	None
POWDER	Volstatic, Inc. Powder Coating Line (2 Manual Booths, One Automatic Booth, and One Natural Gas-Fired Curing Oven)	Prior to 1982	Cyclone and Baghouse
SORD	Heidelberg Model SORD Sheet-Fed Offset Printing Press	Unknown	None
SORS	Heidelberg Model SORS Sheet-Fed Offset Printing Press	Unknown	None
TYPE M	Heidelberg Model TYPE M Sheet-Fed Offset Printing Press	Unknown	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

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

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

- b. 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.

5.2.4 Risk Management Plan

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

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

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

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

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)	6.91
Particulate Matter (PM)	1.65
Sulfur Dioxide (SO ₂)	0.05
Volatile Organic Material (VOM)	10.10
HAP, not included in VOM or PM	49.90
Total	68.61

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal PSD 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 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

None

6.0 EMISSIONS 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 reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

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

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

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

6.2 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 35 IAC 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 the ATU equivalent of 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 6.5.

- i. VOM emissions from insignificant emission 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 in Section 7.0 of 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 Condition 6.8(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 seasonal 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 Transactions

- 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 Emissions 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 the 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 emissions 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 after 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 Sections 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 conditions report within two days after the time when such excess emissions occurred due to the emergency; and
- ii. A final emergency conditions 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 Emissions Report, seasonal VOM emissions 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 35 IAC 205.337;
 - 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 Illinois EPA;
 - 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 is 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 October 31 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 111 ATUs per seasonal allotment period.

- ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 12.5950 tons per season.
- iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 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 during 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 during the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units
Not applicable.

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 emissions 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 the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions 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 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be

excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [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 Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 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 its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit DETREX DETREX Vapor Degreaser
Control CAS Carbon Adsorption System

7.1.1 Description

A vapor degreaser is a sump containing a heater that boils solvent to generate vapors. The height of these pure vapors is controlled by condenser coils or a water jacket encircling the device. Solvent and moisture condensed on the coils are directed to a water separator, where the heavier solvent is drawn off the bottom and is returned to the vapor degreaser. A "freeboard" extends above the top of the vapor zone to minimize vapor escape. Parts to be cleaned are immersed in the vapor zone, and condensation continues until they are heated to the vapor temperature. Residual liquid solvent on the parts rapidly evaporates as they are slowly removed from the vapor zone. Lip mounted exhaust systems carry solvent vapors away from operation personnel. Cleaning action is often increased by spraying the parts with solvent below the vapor level or by immersing them in the liquid solvent bath.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
DETREX	DETREX Model #2DCRS-650-1VBS Vapor Degreaser	AEI Odorkleen Carbon Adsorption System

7.1.3 Applicability Provisions and Applicable Regulations

- a. The Vapor Degreaser is an "affected degreaser" for the purpose of these unit-specific conditions.
- b. The affected degreaser is subject to the NESHAP for Halogenated Solvent Cleaning, 40 CFR 63 Subparts A and T, because it uses a solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
- c. The affected degreaser is subject to 35 IAC 218 Subpart G, Use of Organic Material, which provides that:
 - i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.1.3(c) (ii) (see also 35 IAC 218.302) and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 218.301].

- ii. Emissions of organic material in excess of those permitted by Condition 7.1.3(c) (i) (see also 35 IAC 218.301) are allowable if such emissions are controlled by a vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere [35 IAC 218.302(b)].

7.1.4 Non-Applicability of Regulations of Concern

None

7.1.5 Operational and Production Limits and Work Practices

- a. Pursuant to 40 CFR 63.463(a), except as provided in 40 CFR 63.464 for all cleaning machines, each owner or operator of a solvent cleaning machine subject to the provisions of 40 CFR 63 Subpart T shall ensure that each existing or new batch vapor or in-line solvent cleaning machine subject to the provisions of 40 CFR 63 Subpart T conforms to the design requirements specified in Conditions 7.1.5(a) (i) through (vii) (see also 40 CFR 63.463(a)(1) through (7)). The owner or operator of a continuous web cleaning machine shall comply with the requirements of 40 CFR 63.463(g) or (h), as appropriate, in lieu of complying with this Condition.
 - i. Pursuant to 40 CFR 63.463(a)(1), each cleaning machine shall be designed or operated to meet the control equipment or technique requirements in Condition 7.1.5(a) (i) (A) or (a) (i) (B) (see also 40 CFR 63.463(a)(1) (i) or (a) (1) (ii)).
 - A. An idling and downtime mode cover, as described in Condition 7.1.5(c) (i) (A) (see also 40 CFR 63.463(d)(1) (i)), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects [40 CFR 63.463(a)(1) (i)].
 - B. A reduced room draft as described in Condition 7.1.8(a) (ii) (A) (see also 40 CFR 63.463(e)(2) (ii)) [40 CFR 63.463(a)(1) (ii)].
 - ii. Each cleaning machine shall have a freeboard ratio of 0.75 or greater [40 CFR 63.463(a)(2)].
 - iii. Each cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the

- initial loading of parts through removal of cleaned parts [40 CFR 63.463(a)(3)].
- iv. Each vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils [40 CFR 63.463(a)(4)].
 - v. Each vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser [40 CFR 63.463(a)(5)].
 - vi. Each vapor cleaning machine shall have a primary condenser [40 CFR 63.463(a)(6)].
 - vii. Each cleaning machine that uses a lip exhaust shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of 40 CFR 63.463(e)(2)(vii) [40 CFR 63.463(a)(7)].
- b. Pursuant to 40 CFR 63.463(b)(2), except as provided in 40 CFR 63.464, each owner or operator of an existing or new batch vapor cleaning machine with a solvent/air interface area greater than 1.21 square meters (13 square feet) shall comply with the requirements specified in either 40 CFR 63.463(b)(2)(i) or in the Condition below (see also 40 CFR 63.463(b)(2)(ii)).

Demonstrate that their solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in Condition 7.1.7(b) (see also 63.465(a) and appendix A to 40 CFR part 63 [40 CFR 63.463(b)(2)(ii)]).

- c. Pursuant to 40 CFR 63.463(d), except as provided in 40 CFR 63.464 for all cleaning machines, each owner or operator of an existing or new batch vapor or in-line solvent cleaning machine shall meet all of the following required work and operational practices specified in Conditions 7.1.5(c)(i) through (xii) (see also 40 CFR 63.463(d)(1) through (12)) as applicable. The owner or operator of a continuous web cleaning machine shall comply with the requirements of 40 CFR 63.463(g) or (h), as appropriate, in lieu of complying with this Condition.
- i. Pursuant to 40 CFR 63.463(d)(1), control air disturbances across the cleaning machine opening(s) by incorporating the control equipment or techniques in Condition

7.1.5(c)(i)(A) or (c)(i)(B) (see also 40 CFR 63.463(d)(1)(i) or (d)(1)(ii)).

- A. Cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place [40 CFR 63.463(d)(1)(i)].
 - B. A reduced room draft as described in Condition 7.1.8(a)(ii)(A) (see also 40 CFR 63.463(e)(2)(ii)) [40 CFR 63.463(d)(1)(ii)].
- ii. The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less [40 CFR 63.463(d)(2)].
 - iii. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine) [40 CFR 63.463(d)(3)].
 - iv. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Illinois EPA or USEPA [40 CFR 63.463(d)(4)].
 - v. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped [40 CFR 63.463(d)(5)].
 - vi. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater [40 CFR 63.463(d)(6)].
 - vii. During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off [40 CFR 63.463(d)(7)].
 - viii. When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof

couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface [40 CFR 63.463(d)(8)].

- ix. Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Illinois EPA's or USEPA's satisfaction to achieve the same or better results as those recommended by the manufacturer [40 CFR 63.463(d)(9)].
 - x. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63 Subpart T if requested during an inspection by the Illinois EPA or USEPA [40 CFR 63.463(d)(10)].
 - xi. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container [40 CFR 63.463(d)(11)].
 - xii. Sponges, fabric, wood, and paper products shall not be cleaned [40 CFR 63.463(d)(12)].
- d. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the idling emission limit standards in Condition 7.1.5(b) (see also 40 CFR 63.463(b)(1)(ii), (b)(2)(ii), (c)(1)(ii), or (c)(2)(ii)) shall operate the solvent cleaning machine within parameters identified in the initial performance test [40 CFR 63.463(f)(3)].
- e. Operating Requirements: Pursuant to 35 IAC 218.183(a), no person shall operate an open top vapor degreaser unless:
- i. The cover of the degreaser is closed when workloads are not being processed through the degreaser [35 IAC 218.183(a)(1)];
 - ii. Pursuant to 35 IAC 218.183(a)(2), solvent carry out emissions are minimized by:
 - A. Racking parts to allow complete drainage [35 IAC 218.183(a)(2)(A)];
 - B. Moving parts in and out of the degreaser at less than 3.3 m/min (11 ft/min) [35 IAC 218.183(a)(2)(B)];

- C. Holding the parts in the vapor zone until condensation ceases [35 IAC 218.183(a)(2)(C)];
 - D. Tipping out any pools of solvent on the cleaned parts before removal from the vapor zone [35 IAC 218.183(a)(2)(D)]; and
 - E. Allowing parts to dry within the degreaser until visually dry [35 IAC 218.183(a)(2)(E)].
- iii. Porous or absorbent materials, such as cloth, leather, wood or rope, are not degreased [35 IAC 218.183(a)(3)];
 - iv. Less than half of the degreaser's open top area is occupied with a workload [35 IAC 218.183(a)(4)];
 - v. The degreaser is not loaded to the point where the vapor level would drop more than 10 cm (4 in) when the workload is removed from the vapor zone [35 IAC 218.183(a)(5)];
 - vi. Spraying is done below the vapor level only [35 IAC 218.183(a)(6)];
 - vii. Solvent leaks are repaired immediately [35 IAC 218.183(a)(7)];
 - viii. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere [35 IAC 218.183(a)(8)];
 - ix. Water is not visually detectable in solvent exiting from the water separator [35 IAC 218.183(a)(9)]; and
 - x. Exhaust ventilation exceeding 20 cubic meters per minute per square meter (65 cubic feet per minute per square foot) of degreaser open area is not used, unless necessary to meet the requirements of the Occupational Safety and Health Act (29 U.S.C. Section 651 et seq.) [35 IAC 218.183(a)(10)].
- f. Equipment Requirements: Pursuant to 35 IAC 218.183(b), no person shall operate an open top vapor degreaser unless:
 - i. The degreaser is equipped with a cover designed to open and close easily without disturbing the vapor zone [35 IAC 218.183(b)(1)];

- ii. Pursuant to 35 IAC 218.183(b) (2), the degreaser is equipped with the following switches:
 - A. One which shuts off the sump heat if the amount of condenser coolant is not sufficient to maintain the designed vapor level [35 IAC 218.183(b) (1) (A)]; and
 - B. One which shuts off the spray pump if the vapor level drops more than 10 cm (4 in) below the bottom condenser coil [35 IAC 218.183(b) (1) (B)]; and
 - C. One which shuts off the sump heat source when the vapor level exceeds the design level [35 IAC 218.183(b) (1) (C)].
- iii. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser [35 IAC 218.183(b) (3)];
- iv. Pursuant to 35 IAC 218.183(b) (4), the degreaser is equipped with one of the following devices:
 - A. A freeboard height of 3/4 of the inside width of the degreaser tank or 91 cm (36 in), whichever is less; and if the degreaser opening is greater than 1 square meter (10.8 square feet), a powered or mechanically assisted cover [35 IAC 218.183(b) (4) (A)]; or
 - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA and further processed consistent with 35 IAC 218.108. Such equipment or system may include a refrigerated chiller, an enclosed design or a carbon adsorption system [35 IAC 218.183(b) (4) (B)].
- g. The Permittee shall follow good operating practices for the carbon adsorption system, including periodic inspection, routine maintenance and prompt repair of defects.

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

- a. Pursuant to 40 CFR 63.463(f), each owner or operator of a batch vapor or in-line solvent cleaning machine

complying with the idling emission limit standards in Condition 7.1.5(b) (see also 40 CFR 63.463(b)(1)(ii), (b)(2)(ii), (c)(1)(ii), or (c)(2)(ii)) shall comply with the requirements specified in Conditions 7.1.7(a)(i) through (a)(ii) (see also 40 CFR 63.463(f)(1) through (f)(5)).

- i. Pursuant to 40 CFR 63.463(f)(1), conduct an initial performance test to comply with the requirements specified in Conditions 7.1.7(a)(i)(A) and (a)(i)(B) (see also 40 CFR 63.463(f)(1)(i) and (f)(1)(ii)).
 - A. Demonstrate compliance with the applicable idling emission limit [40 CFR 63.463(f)(1)(i)].
 - B. Establish parameters that will be monitored to demonstrate compliance. If a control device is used that is listed in Condition 7.1.8(a)(ii) (see also 40 CFR 63.463(e)(2)), then the requirements for that control device as listed in Condition 7.1.8(a)(ii) (see also 40 CFR 63.463(e)(2)) shall be used unless the owner or operator can demonstrate to the Illinois EPA's or USEPA's satisfaction that an alternative strategy is equally effective [40 CFR 63.463(f)(1)(ii)].
- ii. Pursuant to 40 CFR 63.463(f)(4), if any of the requirements in Conditions 7.1.7(a)(i), 7.1.8(b), or 7.1.5(d) (see also 40 CFR 63.463(f)(1) through (f)(3)) are not met, determine whether an exceedance has occurred using the criteria in Conditions 7.1.7(a)(ii)(A) and (a)(ii)(B) (see also 40 CFR 63.463(f)(4)(i) and (f)(4)(ii)).
 - A. If using a control listed in Condition 7.1.8(a) (see also 40 CFR 63.463(e)), the owner or operator shall comply with the appropriate parameter values in Condition 7.1.8(a)(ii) (see also 40 CFR 63.463(e)(2)) and the exceedance delineations in Conditions 7.1.8(a)(iii)(A) and (a)(iii)(B) (see also 40 CFR 63.463(e)(3)(i) and (e)(3)(ii)) [40 CFR 63.463(f)(4)(i)].
 - B. If using a control not listed in Condition 7.1.8(a) (see also 40 CFR 63.463(e)), the owner or operator shall indicate whether the exceedance of the parameters that are monitored to determine the proper functioning of this control would be classified as an immediate exceedance or whether a 15 day repair period would be

allowed. This information must be submitted to the Illinois EPA or USEPA for approval [40 CFR 63.463(f) (4) (ii)].

- b. Except as provided in 40 CFR 63.465(f) and (g) for continuous web cleaning machines, each owner or operator of a batch vapor or in-line solvent cleaning machine complying with an idling emission limit standard in Condition 7.1.5(b) (see also 40 CFR 63.463(b) (2) (ii)) shall determine the idling emission rate of the solvent cleaning machine using Reference Method 307 in appendix A of 40 CFR part 63 [40 CFR 63.465(a)].
- c. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7) (b) of the Act, the vapor pressure of the cleaning solvent, the exhaust ventilation rates, and the performance of any control devices shall be determine according to the methods specified in Conditions 7.1.7(d) and (e).
- d. The following test methods shall be used to demonstrate compliance with 35 IAC 218 Subpart E:
 - i. Vapor pressures shall be determined by using the procedure specified in 35 IAC 218.110 [35 IAC 218.186(a)];
 - ii. Exhaust ventilation rates shall be determined by using the procedures specified in 35 IAC 218.105(f) (3) [35 IAC 218.186(b)]; and
 - iii. The performance of control devices shall be determined by using the procedures specified in 35 IAC 218.105(f) [35 IAC 218.186(c)].
- e. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7) (b) of the Act, the efficiency of each capture system and control device used on the affected degreaser shall be determined as follows:

Capture System Efficiency Test Protocols: Pursuant to 35 IAC 218.105(c) (1) (B), if an emission unit is equipped with (or uses) a control device designed to collect and recover VOM (e.g., carbon adsorber), an explicit measurement of capture efficiency is not necessary provided that the conditions given below are met. The overall control of the system can be determined by directly comparing the input liquid VOM to the recovered liquid VOM. The general procedure for use in this situation is given in 40 CFR 60.433 with the following additional restrictions:

- i. The owner or operator shall obtain data each operating day for the solvent usage and solvent recovery to permit the determination of the solvent recovery efficiency of the

system each operating day using a 7-day rolling period. The recovery efficiency for each operating day is computed as the ratio of the total recovered solvent for that day and the most recent prior 6 operating days to the total solvent usage for the same 7-day period used for the recovered solvent, rather than a 30-day weighted average as given in 40 CFR 60.433. This ratio shall be expressed as a percentage. The ratio shall be computed within 72 hours following each 7-day period. A source that believes that the 7-day rolling period is not appropriate may use an alternative multi-day rolling period not to exceed 30 days, with the approval of the Illinois EPA and USEPA. In addition, the criteria in Condition 7.1.7(e) (ii) or 7.1.7(e) (iii) (see also 35 IAC 218.105(c) (1) (B) (iii)) or 35 IAC 218.105(c) (1) (B) (iv)) must be met [35 IAC 218.105(c) (1) (B) (i)].

- ii. The solvent recovery system (i.e., capture and control system) must be dedicated to a single coating line, printing line, or other discrete activity that by itself is subject to an applicable VOM emission standard [35 IAC 218.105(c) (1) (B) (iii)]; or
- iii. If the solvent recovery system controls more than one coating line, printing line or other discrete activity that by itself is subject to an applicable VOM emission standard, the overall control (i.e., the total recovered VOM divided by the sum of liquid VOM input from all lines and other activities venting to the control system) must meet or exceed the most stringent standard applicable to any line or other discrete activity venting to the control system [35 IAC 218.105(c) (1) (B) (iv)].

7.1.8 Monitoring Requirements

- a. Pursuant to 40 CFR 63.463(e), each owner or operator of a solvent cleaning machine complying with Condition 7.1.5(b) (see also 40 CFR 63.463(b)) shall comply with the requirements specified in Conditions 7.1.8(a) (i) through (a) (iii) (see also 40 CFR 63.463(e) (1) through (4)).
 - i. Conduct monitoring of each control device used to comply with Condition 7.1.5(a), (b), or (c) (see also 40 CFR 63.463) as provided in Condition 7.1.8(c) through (f) (see also 40 CFR 63.466) [40 CFR 63.463(e) (1)].

- ii. Pursuant to 40 CFR 63.463(e)(2), determine during each monitoring period whether each control device used to comply with 40 CFR 63 Subpart T meets the requirements specified in Conditions 7.1.8(a)(ii)(A) through (C) (see also 40 CFR 63.463(e)(2)(i) through (xi)).
 - A. Pursuant to 40 CFR 63.463(e)(2)(ii), if a reduced room draft is used to comply with 40 CFR 63 Subpart T, the owner or operator shall comply with the requirements specified in Conditions 7.1.8(a)(ii)(A)(I) and (a)(ii)(A)(II) (see also 40 CFR 63.463(e)(2)(ii)(A) and (e)(2)(ii)(B)).
 - I. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in Condition 7.1.8(d) (see also 40 CFR 63.466(d)) [40 CFR 63.463(e)(2)(ii)(A)].
 - II. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in Condition 7.1.8(d) (see also 40 CFR 63.466(d) [40 CFR 63.463(e)(2)(ii)(B)]).
 - B. Pursuant to 40 CFR 63.463(e)(2)(iv), if an idling-mode cover is used to comply with 40 CFR 63 Subpart T, the owner or operator shall comply with the requirements specified in Conditions 7.1.8(a)(ii)(B)(I) and (a)(ii)(B)(II) (see also 40 CFR 63.463(e)(2)(iv)(A) and (e)(2)(iv)(B)).
 - I. Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place [40 CFR 63.463(e)(2)(iv)(A)].
 - II. Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects [40 CFR 63.463(e)(2)(iv)(B)].
 - C. Pursuant to 40 CFR 63.463(e)(2)(vii), if a carbon adsorber in conjunction with a lip

exhaust is used to comply with 40 CFR 63 Subpart T, the owner or operator shall comply with the requirements specified in Conditions 7.1.8(a)(ii)(C)(I) through (a)(ii)(C)(III) (see also 40 CFR 63.463(e)(2)(vii)(A) through (e)(2)(vii)(C)).

I. Ensure that the concentration of organic solvent in the exhaust from this device does not exceed 100 parts per million of any halogenated HAP compound as measured using the procedure in Condition 7.1.8(e) (see also 63.466(e)). If the halogenated HAP solvent concentration in the carbon adsorber exhaust exceeds 100 parts per million, the owner or operator shall adjust the desorption schedule or replace the disposable canister, if not a regenerative system, so that the exhaust concentration of halogenated HAP solvent is brought below 100 parts per million [40 CFR 63.463(e)(2)(vii)(A)].

II. Ensure that the carbon adsorber bed is not bypassed during desorption [40 CFR 63.463(e)(2)(vii)(B)].

III. Ensure that the lip exhaust is located above the solvent cleaning machine cover so that the cover closes below the lip exhaust level [40 CFR 63.463(e)(2)(vii)(C)].

iii. Pursuant to 40 CFR 63.463(e)(3), If any of the requirements of Condition 7.1.8(a)(ii) (see also 40 CFR 63.463(e)(2)) are not met, determine whether an exceedance has occurred using the criteria in Conditions 7.1.8(a)(iii)(A) and (a)(iii)(B) (see also 40 CFR 63.463(e)(3)(i) and (e)(3)(ii)).

A. An exceedance has occurred if the requirements of Conditions 7.1.8(a)(ii)(A)(II), (a)(ii)(B)(I), or (a)(ii)(C)(I) (see also 40 CFR 63.463(e)(2)(ii)(B), (e)(2)(iii)(A), (e)(2)(iv)(A), (e)(2)(v), (e)(2)(vi)(B), (e)(2)(vi)(C), (e)(2)(vii)(B), or (e)(2)(vii)(C)) have not been met [40 CFR 63.463(e)(3)(i)].

B. An exceedance has occurred if the requirements of Conditions 7.1.8(a)(ii)(A)(I), (a)(ii)(B)(II), or

- (a)(ii)(C)(I) (see also 40 CFR 63.463(e)(2)(i), (e)(2)(ii)(A), (e)(2)(iii)(B), (e)(2)(iv)(B), (e)(2)(vi)(A), or (e)(2)(vii)(A)) have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits [40 CFR 63.463(e)(3)(ii)].
- b. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the idling emission limit standards in Condition 7.1.5(b) (see also 40 CFR 63.463(b)(1)(ii), (b)(2)(ii), (c)(1)(ii), or (c)(2)(ii)) shall conduct the periodic monitoring of the parameters used to demonstrate compliance as described in Condition 7.1.8(f) (see also 40 CFR 63.466(f) [40 CFR 63.463(f)(2)]).
- c. Pursuant to 40 CFR 63.466(c), except as provided in 40 CFR 63.466(g), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the equipment or idling standards in Condition 7.1.5(a) (see also 40 CFR 63.463) shall monitor the hoist speed as described in Conditions 7.1.8(c)(i) through (c)(iv) (see also 40 CFR 63.466(c)(1) through (c)(4)).
- i. The owner or operator shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute) [40 CFR 63.466(c)(1)].
- ii. The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly [40 CFR 63.466(c)(2)].
- iii. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated [40 CFR 63.466(c)(3)].
- iv. If an owner or operator can demonstrate to the Illinois EPA's or USEPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance [40 CFR 63.466(c)(4)].

- d. Pursuant to 40 CFR 63.466(d), except as provided in 40 CFR 63.466(g), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the equipment standards in 40 CFR 63.463(b)(1)(i), (b)(2)(i), (c)(1)(i), or (c)(2)(i) using a reduced room draft shall conduct monitoring and record the results as specified in Conditions 7.1.8(d)(i) or (d)(ii) (see also 40 CFR 63.466(d)(1) or (d)(2)).

- i. Pursuant to 40 CFR 63.466(d)(1), if the reduced room draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), the owner or operator shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters as specified in Conditions 7.1.8(d)(i)(A) and (d)(i)(B) (see also 40 CFR 63.466(d)(1)(i) and (d)(1)(ii)).
 - A. Pursuant to 40 CFR 63.466(d)(1)(i), measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the procedure specified in Conditions 7.1.8(d)(i)(A)(I) through (d)(i)(A)(IV) (see also 40 CFR 63.466(d)(1)(i)(A) through (d)(1)(i)(D)).
 - I. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located [40 CFR 63.466(d)(1)(i)(A)].
 - II. Orient a velometer in the direction of the wind current at each of the four corners of the machine [40 CFR 63.466(d)(1)(i)(B)].
 - III. Record the reading for each corner [40 CFR 63.466(d)(1)(i)(C)].
 - IV. Average the values obtained at each corner and record the average wind speed [40 CFR 63.466(d)(1)(i)(D)].
 - B. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft [40 CFR 63.466(d)(1)(ii)].
- ii. Pursuant to 40 CFR 63.466(d)(2), if an enclosure (full or partial) is used to achieve a reduced room draft, the owner or operator shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the windspeed within the enclosure using the procedure specified in Conditions 7.1.8(d)(ii)(A) and (d)(ii)(B) (see also 40 CFR 63.466(d)(2)(i) and (d)(2)(ii)) and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.

- A. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located [40 CFR 63.466(d) (2) (i)].
 - B. Record the maximum wind speed [40 CFR 63.466(d) (2) (ii)].
- e. Pursuant to 40 CFR 63.466(e), except as provided in 40 CFR 63.466(g), each owner or operator using a carbon adsorber to comply with this subpart shall measure and record the concentration of halogenated HAP solvent in the exhaust of the carbon adsorber weekly with a colorimetric detector tube. This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined using the procedure specified in Conditions 7.1.8(e) (i) through (e) (iii) (see also 40 CFR 63.466(e) (1) through (e) (3)).
 - i. Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of solvent in air to an accuracy of ± 25 parts per million by volume [40 CFR 63.466(e) (1)].
 - ii. Use the colorimetric detector tube according to the manufacturer's instructions [40 CFR 63.466(e) (2)].
 - iii. Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet [40 CFR 63.466(e) (3)].
- f. Pursuant to 40 CFR 63.466(f), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the idling emission limit standards of Condition 7.1.5(b) (see also 40 CFR 63.463(b) (1) (ii), (b) (2) (ii), (c) (1) (ii), or (c) (2) (ii)) shall comply with the requirements specified in Conditions 7.1.8(f) (i) and (f) (ii) (see also 40 CFR 63.466(f) (1) and (f) (2)).
 - i. If using controls listed in Conditions 7.1.8(c) through (e) (see also 40 CFR 63.466(a) through (e)), the owner or operator shall comply with the monitoring frequency requirements in Conditions 7.1.8(c) through

- (e) (see also 40 CFR 63.466(a) through (e)) [40 CFR 63.466(f) (1)].
 - ii. If using controls not listed in Conditions 7.1.8(c) through (e) (see also 40 CFR 63.466(a) through (e)), the owner or operator shall establish the monitoring frequency for each control and submit it to the Illinois EPA or USEPA for approval in the initial test report [40 CFR 63.466(f) (2)].
- g. Pursuant to 35 IAC 218.105(d) (2) (A) (iii), an owner or operator that uses a carbon adsorber to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the carbon adsorber is in use. The continuous monitoring equipment must monitor for each carbon adsorber, the VOM concentration of each carbon adsorption bed exhaust or the exhaust of the bed next in sequence to be desorbed.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected degreaser to demonstrate compliance with Conditions 5.5.1, 7.1.3, and 7.1.5, pursuant to Section 39.5(7) (b) of the Act:

- a. Pursuant to 40 CFR 63.467(a), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of Conditions 7.1.5(a) and (b) (see also 40 CFR 63.463) shall maintain records in written or electronic form specified in Conditions 7.1.9(a) (i) through (iv) (see also 40 CFR 63.467(a) (1) through (7)) for the lifetime of the machine.
 - i. Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment [40 CFR 63.467(a) (1)].
 - ii. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted [40 CFR 63.467(a) (2)].
 - iii. Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the idling emission limit standards of Condition 7.1.5(b) (see also 40 CFR

63.463(b)(1)(ii), (b)(2)(ii), (c)(1)(ii), or (c)(2)(ii)) shall maintain records of the initial performance test, including the idling emission rate and values of the monitoring parameters measured during the test [40 CFR 63.467(a)(4)].

- iv. Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of 40 CFR 63 Subpart T [40 CFR 63.467(a)(5)].
- b. Pursuant to 40 CFR 63.467(b), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with Conditions 7.1.5(a) and (b) (see also 40 CFR 63.463) shall maintain records specified in Conditions 7.1.9(b)(i) through (iii) (see also 40 CFR 63.467(b)(1) through (b)(4)) either in electronic or written form for a period of 5 years.
- i. The results of control device monitoring required under Condition 7.1.8(c) through (e) (see also 40 CFR 63.466) [40 CFR 63.467(b)(1)].
 - ii. Information on the actions taken to comply with Conditions 7.1.8(a) and (b) and 7.1.7(a) (see also 40 CFR 63.463(e) and (f)). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels [40 CFR 63.467(b)(2)].
 - iii. Estimates of annual solvent consumption for each solvent cleaning machine [40 CFR 63.467(b)(3)].
 - iv. If a carbon adsorber is used to comply with 40 CFR 63 Subpart T, records of the date and results of the weekly measurement of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in Condition 7.1.8(e) (see also 40 CFR 63.466(e)) [40 CFR 63.467(b)(4)].
- c. Records of the testing of the affected degreaser pursuant to Condition 7.1.7, which include the following [Section 39.5(7)(e) of the Act]:
- i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;

- iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- d. Records addressing use of good operating practices for the carbon adsorption system:
- i. Records for periodic inspection of the carbon adsorption system with date, individual performing the inspection, and nature of inspection; and
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. The recovery efficiency of the carbon adsorption system shall be calculated daily in accordance with the procedures specified in Condition 7.1.7(e) (i) (see also 35 IAC 218.105(c) (1) (B) (i));
- f. Records of monthly and aggregate annual VOM emissions from the affected degreaser shall be maintained, based on solvent consumption and the applicable emission factors and formulas, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected degreaser 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. The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in Condition 7.1.10(d) (see also 40 CFR 63.468(h)) [40 CFR 63.463(e) (4)].
- b. each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the idling emission limit standards in Condition 7.1.5(b) (see also 40 CFR 63.463(b) (1) (ii), (b) (2) (ii), (c) (1) (ii), or (c) (2) (ii)) shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in Condition 7.1.10(d) (see also 40 CFR 63.468(h)) [40 CFR 63.463(f) (5)].

- c. Pursuant to 40 CFR 63.468(f), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of Conditions 7.1.5(a) and (b) (see also 40 CFR 63.463) shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified in Conditions 7.1.10(c) (i) through (c) (iii) (see also 40 CFR 63.468(f) (1) through (f) (3)).
 - i. A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in Condition 7.1.5(d) (x) (see also 40 CFR 63.463(d) (10))" [40 CFR 63.468(f) (1)].
 - ii. An estimate of solvent consumption for each solvent cleaning machine during the reporting period [40 CFR 63.468(f) (2)].
 - iii. The reports required under Condition 7.1.10(c) (see also 40 CFR 63.468(f) and (g)) can be combined into a single report for each facility [40 CFR 63.468(f) (3)].

- c. Pursuant to 40 CFR 63.468(h), each owner or operator of a batch vapor or in-line solvent cleaning machine shall submit an exceedance report to the Illinois EPA or USEPA semiannually except when, the Illinois EPA or USEPA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under Condition 7.1.10(e) (see also 40 CFR 63.468(i)) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in Conditions 7.1.10(d) (i) through (iii) (see also 40 CFR 63.468(h) (1) through (3)).
 - i. Information on the actions taken to comply with Conditions 7.1.8(a) and (b) and 7.1.7(a) (see also 40 CFR 63.463(e) and (f)). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels [40 CFR 63.468(h) (1)].

- ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken [40 CFR 63.468(h) (2)].
 - iii. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report [40 CFR 63.468(h) (3)].
- e. Pursuant to 40 CFR 63.468(i), an owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in Conditions 7.1.10(e) (i) through (e) (iii) (see also 40 CFR 63.468(i) (1) through (i) (3)) are met.
- i. The source has demonstrated a full year of compliance without an exceedance [40 CFR 63.468(i) (1)].
 - ii. The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified 40 CFR 63 Subpart A (General Provisions) and in 40 CFR 63 Subpart T [40 CFR 63.468(i) (2)].
 - iii. The Illinois EPA or USEPA does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e) (3) (iii) of 40 CFR 63 Subpart A (General Provisions) [40 CFR 63.468(i) (3)].

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:

To determine compliance with Conditions 5.5.1 and 7.1.3(c) (ii), VOM and HAP emissions from the affected degreaser shall be calculated based on the following:

a. Carbon Adsorption System Recovery:

$$\text{Recovery Efficiency (\%)} = \left[\frac{(\text{Solvent Recovered, lb})}{(\text{Solvent Added to Degreaser, lb})} \right] \times 100$$

b. VOM and HAP Emissions:

$$\text{Degreaser Emissions (lb)} = \text{Solvent Added to Degreaser, lb} - (\text{Solvent Recovered, lb})$$

7.2 Units Heidelberg Heidelberg Printing Presses

7.2.1 Description

This source operates lithographic printing lines, which are used to print instructions for their products.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
KORD	Heidelberg Model KORD Sheet-Fed Offset Printing Press	None
SORD	Heidelberg Model SORD Sheet-Fed Offset Printing Press	None
SORS	Heidelberg Model SORS Sheet-Fed Offset Printing Press	None
TYPE M	Heidelberg Model TYPE M Sheet-Fed Offset Printing Press	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The Heidelberg Printing Presses are "affected printing lines" for the purpose of these unit-specific conditions.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 9 and 63, Subparts A and KK, because the affected printing lines are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.
- b. The affected printing lines are not subject to the control requirements of 35 IAC 218.407, Emission Limitations and Control Requirements for Lithographic Printing Lines On and After March 15, 1996 pursuant to 35 IAC 218.405(d)(2), which exempts sources with combined emissions of VOM from all lithographic printing line(s) (including solvents used for cleanup operations associated with the lithographic printing line(s)) that never exceed 45.5 kg/day (100 lb/day).

7.2.5 Operational and Production Limits and Work Practices

None

7.2.6 Emission Limitations

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

- a. Emissions of VOM from all lithographic printing lines at the source shall not exceed 100 lbs/day, combined.
- b. These limits ensure that the affected printing lines are not subject to the control requirements of 35 IAC Part 218, Subpart H, Emission Limitations and Control Requirements for Lithographic Printing Lines On and After March 15, 1996.

7.2.7 Testing Requirements

Pursuant to 35 IAC 218.409(c), testing to demonstrate compliance with the VOM content limitations in to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of Condition 7.2.12(a) (see also 35 IAC 218.411(a) (1) (B))), shall be conducted upon request of the Illinois EPA, as follows:

- a. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, shall be used to demonstrate compliance [35 IAC 218.409(c) (1)]; or
- b. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a) provided, however, Method 24 shall be used to determine compliance [35 IAC 218.409(c) (2)].

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6, pursuant to Section 39.5(7) (b) of the Act:

- a. Records of the testing of VOM content of coatings, inks, and cleaning solvents pursuant to Condition 7.2.7, 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.
 - iv. Person performing analysis.
- b. On and after March 15, 1996, pursuant to 35 IAC 218.411(a) (2), an owner or operator of lithographic printing line(s) exempt from the limitations of 35 IAC 218.407 because of the criteria in Conditions 7.2.4(b) (see also 35 IAC 218.405(d)) and 7.2.6 shall collect and record the information specified in 35 IAC 218.411(a) (2) (B) (i.e., purchase and inventory recordkeeping) for all lithographic printing lines at the source, including the following:
 - i. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month [35 IAC 218.411(a) (2) (B) (i)];
 - ii. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source [35 IAC 218.411(a) (2) (B) (ii)];
 - iii. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source [35 IAC 218.411(a) (2) (B) (iii)];
 - iv. A daily record which shows whether a lithographic printing line at the source was in operation on that day [35 IAC 218.411(a) (2) (B) (iv)];
 - v. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records required to be maintained pursuant to Conditions 7.2.9(c) (i), (ii), and (iv) (see also 35 IAC 218.411(a) (2) (B) (i), (a) (2) (B) (ii) and

- (a) (2) (B) (iii)) [35 IAC 218.411(a) (2) (B) (v)];
and
- vi. The VOM emissions in lb/day for the month, calculated in accordance with Condition 7.2.12(a) (see also 35 IAC 218.411(a) (1) (B)) [35 IAC 218.411(a) (2) (B) (vi)].
- c. Ink and coating purchase records for the affected printing lines, gal/day and gal/yr;
- d. The VOM content of inks and coatings, % by Wt;
- e. Density of inks and coatings, lb/gal;
- f. Solvent purchase records for the affected printing lines, gal/day and gal/yr;
- g. Density of solvent, lb/gal; and
- h. The monthly and aggregate annual VOM emissions from the affected printing lines based on ink and solvent purchase, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected printing 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. On and after March 15, 1996, an owner or operator of lithographic printing line(s) exempt from the limitations of 35 IAC 218.407 because of the criteria in Condition 7.2.4(b) (see also 35 IAC 218.405(d)) and 7.2.6 shall notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lb/day), before the use of capture systems and control devices, within 30 days after the event occurs. Such notification shall include a copy of all records of such event [35 IAC 218.411(a) (3)].
- b. Emissions of VOM in excess of the limits in Condition 7.2.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. Pursuant to 35 IAC 218.411(a) (1) (B), calculations which demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 45.5 kg/day (100 lb/day) before the use of capture systems and control devices, as follows:
 - i. To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that printing lines at the source were in operation [35 IAC 218.411(a) (1) (B) (i)];
 - ii. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the tests methods and procedures set forth in Condition 7.2.7 (see also 35 IAC 218.409(c)) shall be used [35 IAC 218.411(a) (1) (B) (ii)];
 - iii. To determine VOM emissions from inks used on lithographic printing line(s) at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing line(s) [35 IAC 218.411(a) (1) (B) (iii)]; and
 - iv. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing line(s) at the source, no retention factor is used [35 IAC 218.411(a) (1) (B) (iv)].
- b. To determine compliance with Conditions 5.5.1 and 7.2.6, emissions from the affected printing lines shall be calculated based on the following:

Volatile Organic Material Emissions:

$$\text{VOM (lb)} = (\text{Coating or Ink Usage, gal}) \times (\text{Coating Density, lb/gal}) \times (\text{VOM Content of Coating or Ink, lb/gal}) \times (\text{Adjustment Factor for VOM Retention in Substrate}) + (\text{Cleaning Solvent Usage, gal}) \times (\text{Solvent Density, lb/gal})$$

7.3 Units Boilers #1 and #2 Natural Gas-Fired Boilers

7.3.1 Description

This source operates two natural gas-fired boilers to produce process steam and to heat the plant.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Boiler #1	Cleaver Brooks Model CB200-400 Natural Gas-Fired Boiler (Boiler #1, 16.738 mmBtu/hr)	None
Boiler #2	American International Model AC7865 Natural Gas-Fired Boiler (Boiler #2, 14.500 mmBtu/hr)	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. Boilers #1 and #2 are "affected boilers" for the purpose of these unit-specific conditions.
- b. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to the NSPS for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because construction, modification, or reconstruction of each affected boiler commenced prior to June 9, 1989.
- b. The affected boilers are not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from new Fuel Combustion Emission Sources, and 35 IAC 217.141, Emissions of Nitrogen Oxides from Existing Fuel Combustion Emission Sources in Major Metropolitan Areas, because the actual heat input of each of these affected boilers is less than 73.2 MW (250 mmBtu/hr).
- c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use Of Organic Material.

7.3.5 Operational and Production Limits and Work Practices

The affected boilers shall only be operated with natural gas as the fuel.

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected boiler to demonstrate compliance with Conditions 5.5.1 and 7.3.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the fuel usage for each affected boiler, Mft³/mo and Mft³/yr; and
- b. Records of the monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected boiler shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected boiler 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:

The use of any fuel other than the fuel specified in Condition 7.3.5 within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. Compliance with Conditions 7.3.3(b) and (c) is assumed by the work-practices inherent in operation of a natural gas-fired boiler, so that no compliance procedures are set in this permit addressing these regulations.
- b. To determine compliance with Condition 5.5.1, emissions from the affected boiler shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/Mft³)</u>
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

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

$$\text{Boiler Emissions (lb)} = (\text{Natural Gas Consumed, Mft}^3) \times (\text{The Appropriate Emission Factor, lb/Mft}^3)$$

- 7.4 Unit POWDER Powder Coating Line
- Control POWDER Powder Coating Line Cyclone and Baghouse

7.4.1 Description

The powder coating line consists of two manual and one automatic powder coating booths. Each booth has self-contained air filtration. The powder paint overspray is collected in the booths and ducted to the powder paint booth cyclone. The air from the cyclone is returned to the painting equipment room within the building. Once the parts are painted, they are conveyed through a natural gas-fired oven for curing.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
POWDER	Volstatic, Inc. Powder Coating Line (2 Manual Booths, One Automatic Booth, and One Natural Gas-Fired Curing Oven)	Cyclone and Baghouse

7.4.3 Applicability Provisions and Applicable Regulations

- a. The Powder Coating Line is an "affected coating line" for the purpose of these unit-specific conditions.
- b. The affected coating line is subject to the emission limits identified in Condition 5.2.2.
- c. The affected coating line is 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 the affected coating line is less than 100 pounds per hour, the allowable PM emission rate for the affected coating line set by 35 IAC 212.321 is 0.55 pounds per hour.
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

e. 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. Miscellaneous Metal Parts and Products
Coating/Extreme Performance Coating (Baked)
[35 IAC 218.204(j) (2) (B)]:

kg/l	lb/gal
0.40	3.3

ii. Miscellaneous Metal Parts and Products
Coating/All Other Coatings (Baked) [35 IAC
218.204(j) (4) (B)]:

kg/l	lb/gal
0.34	2.8

7.4.4 Non-Applicability of Regulations of Concern

- a. The curing oven on the affected coating line is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the actual heat input is less than 2.9 MW (10 mmBtu/hr) and the drying oven is not by definition a fuel combustion emission unit.
- b. The curing oven on the affected coating line is not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Sources, because the actual heat input is less than 73.2 MW (250 mmBtu/hr) and the drying oven is not by definition a fuel combustion emission unit.
- c. 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 PM₁₀, as identified in 35 IAC 212.324(a) (1).
- d. 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].

7.4.5 Operational and Production Limits and Work Practices

- a. The Permittee shall follow good operating practices for the cyclone and baghouse, including periodic inspection, routine maintenance and prompt repair of defects.
- b. The curing oven on the affected coating line shall only be operated with natural gas as the fuel.

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Testing Requirements

- a. Pursuant to 35 IAC 212.110 and Section 39.5(7)(b) of the Act, testing for PM emissions shall be performed as follows:
 - i. Measurement of particulate matter emissions from stationary emission units subject to 35 IAC Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E [35 IAC 212.110(a)].
 - ii. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4 [35 IAC 212.110(b)].
 - iii. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 IAC Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA [35 IAC 212.110(c)].
- b. 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 7.4.7(b) (see also 35 IAC 218.211) [35 IAC 218.211(a)].
- c. 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 7.4.9(c) directly reflect the application of such material and separately account for any additions of solvent.

7.4.8 Monitoring Requirements

None

7.4.9 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 and 7.4.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 35 IAC 212.110(e) and Section 39.5(7)(e) of the Act, the owner or operator of an emission unit subject 35 IAC Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed and shall include the following:
 - i. The date, place and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.4.7, 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.
- c. 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 each affected coating line; 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 each affected coating line.
- d. Records addressing use of good operating practices for the cyclone and baghouse:
- i. Records for periodic inspection of the cyclone and baghouse with date, individual performing the inspection, and nature of inspection; and
 - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Records of the coating usage for the affected coating line, lb/mo and lb/yr;
- f. The VOM content of coatings, % by Wt;
- g. The solvent usage for the affected coating line, gal/mo and gal/yr;
- h. Density of solvent, lb/gal;
- i. Records of the fuel usage the curing oven on the affected coating line, Mft³/mo and Mft³/yr; and
- j. The operating schedule of the affected coating line, hr/mo and hr/yr;
- k. The aggregate monthly and annual PM and VOM emissions from the affected coating line based on the material usage, with supporting calculations; and
- l. Records of the monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the curing oven on the affected coating line shall be maintained, based on

fuel consumption and the applicable emission factors, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations 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. A person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from Condition 7.3.7(a) (see also 35 IAC 212.110) that will be used [35 IAC 212.110(d)].
- b. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.4.3(e) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.
- c. Continued operation of the affected coating line with a defect in the cyclone that may result in emissions of particulate matter in excess of limits in Condition 7.4.3(c) within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

- a. Compliance with Condition 7.4.3(c) is assumed to be achieved by proper operation of the dry filter system, as addressed by Condition 7.4.5(a).
- b. Compliance with Condition 7.4.3(d) is assured by the work-practices inherent in operation of a natural gas-fired curing oven.
- c. To determine compliance with Condition 5.5.1, PM and VOM emissions from the affected coating line shall be calculated based on the following:
 - i. Particulate Matter Emissions:

$$\text{PM (lb)} = (\text{Coating Usage, lb}) \times [1 - (\text{Transfer Efficiency}^* (\%)/100)] \times [1 - (\text{Cyclone Efficiency and Baghouse}^* (\%)/100)]$$

*As specified by manufacturer or vendor of the spray booths, cyclone, and baghouse

ii. Volatile Organic Material Emissions:

$$\text{VOM (lb)} = (\text{Coating Usage, lb}) \times (\text{VOM Content of Coating, \% by Wt.}) + (\text{Cleaning Solvent Usage, gal}) \times (\text{Solvent Density, lb/gal})$$

- d. To determine compliance with Condition 5.5.1, emissions from the curing oven on the affected coating line shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/Mft³)</u>
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

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

$$\text{Curing Oven Emissions (lb)} = (\text{Natural Gas Consumed, Mft}^3) \times (\text{The Appropriate Emission Factor, lb/Mft}^3)$$

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 September 1, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring

(including test methods), recordkeeping, reporting, or compliance certification requirements;

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

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

<u>Monitoring Period</u>	<u>Report Due Date</u>
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
 - 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)(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 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 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77

0.2 Metric P Mg/hr	0.42 E kg/hr	0.2 English P T/hr	1.10 E lb/hr
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 - 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:psj

10.3 Attachment 3 - Preliminary Baseline Emissions Summary

Seasonal VOM emissions from excluded units, in tons/season (TPS):

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>	<u>Notes</u>
Degreaser	<u>12.5950</u>	<u>0.0000</u>	1, 2
Total:	12.5950	0.0000	

Seasonal VOM emissions from units subject to further reduction, in TPS:

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>	<u>Notes</u>
Degreaser	0.0000	12.5950	1
Boilers 1 and 2	0.0100	0.0000	2
Soldering	0.1100	0.0000	2
Graphic Arts	<u>0.4100</u>	<u>0.0000</u>	2
Total:	0.5300	12.5950	

Notes: 1. The degreaser NESHAP was promulgated in December 1994, so the degreaser cannot be excluded from further reduction.

2. No information provided for these units although they are significant units in the CAAPP permit.

The source shall maintain records of actual seasonal VOM emissions for all emission units not considered insignificant activities in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit starting with the 2003 seasonal allotment period of May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by October 31 of each year, pursuant to 35 IAC 205.300.

TOTAL SOURCE ALLOTMENT = 0.0000 + (0.88 x 12.5950) = 11.0836 TPS

OR 111 ATU

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATUs equals 1 ton.

RPS:psj

10.4 Attachment 4 - Guidance on Revising This Permit

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

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

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

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
 - Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

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

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

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

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

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



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

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

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

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits?		<input type="checkbox"/> Yes <input type="checkbox"/> 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? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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.

10.5 Attachment 5 - 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