

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Amcor White Cap, LLC
Attn: Ralph Fasano
1819 North Major Avenue
Chicago, Illinois 60639

Application No.: 95120061 I.D. No.: 031600ARM
Applicant's Designation: Date Received: December 6, 1995
Operation of: Manufacturer of Metal Closures
Date Issued: July 12, 1999 Expiration Date²: July 12, 2004
Source Location: 1819 North Major Avenue, Chicago, Cook, 60639
Responsible Official: Ralph Fasano, Manager of Division Affairs

This permit is hereby granted to the above-designated Permittee to OPERATE a metal closure manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: November 15, 2002
Revision Date Issued: December 4, 2002
Purpose of Revision: Administrative Amendment

This Administrative Amendment is being issued due to an ownership change. Because the changes in the permit were only administrative, no formal notice was issued.

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

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

DES:DWH:jar

cc: Illinois EPA, FOS, Region 1

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 B federal PSD and 35 IAC Part 203 B Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Amcor White Cap, LLC
1819 North Major Avenue
Chicago, Illinois 60639
Telephone: 773/804-3579

I.D. No.: 031600ARM
Standard Industrial Classification: 3466 Crowns and Closures

1.2 Owner/Parent Company

Amcor White Cap Americas
1140 31st Street
Downers Grove, Illinois 60515

1.3 Operator

Amcor White Cap, LLC
1819 North Major Avenue
Chicago, Illinois 60639

Contact Person: Ralph Fasano, Manager of Division Affairs
Contact Phone No.: 773/804-3579

1.4 General Source Description

Amcor White Cap, LLC is located at 1819 North Major Avenue in Chicago. The source manufactures metal closures for food and beverage glass packaging and also refurbishes industrial machinery used in the capping process. The source has lithography lines that coat the closures and this is where the majority of the plant's VOM emissions occur.

2.0 LIST OF ABBREVIATIONS/ACRONYMS

acfm	Actual cubic feet per minute
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
°F	degrees Fahrenheit
ft ³	cubic foot
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kg	kilogram
kW	kilowatts
lb	pound
m	meter
Mg	Megagrams
mmBtu	Million British thermal units
mo	month
MW	Megawatts
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
OM	Organic Material
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
PTE	permanent total enclosure
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Ton
T1	Title I B identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New B identifies Title I conditions that are being established in this permit
T1R	Title I Revised B identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit

USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
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:

VOM Storage Tanks
Soil Vapor Extraction System
Instapak Operation
Make-Up Air Units

- 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:

Internally vented compound mixer and dust collector.

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

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

Equipment used for the melting or application of less than 50,000 lbs/year of wax to which no organic solvent has been added [35 IAC 201.210(a)(7)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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

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

3.2 Addition of Insignificant Activities

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

3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
PC2	Printing/Coating Line PC2	1947	ABB Thermal Oxidizer
PC3	Printing/Coating Line PC3	1947	ABB Thermal Oxidizer
C9A	Coating Line C9A	1947	Catalytic Oxidizer CD2
PC10A	Printing/Coating Line PC10A	1947	Catalytic Oxidizer CD2
C9B	Coating Line C9B	1947	Catalytic Oxidizer CD3
C10B	Coating Line C10B	1947	Catalytic Oxidizer CD3
PPC2	Printing/Coating Line PPC2	1995	ABB Thermal Oxidizer & PTE
C3	Coating Line C3	1995	ABB Thermal Oxidizer & PTE
C4	Coating Line C4	1998	Quadrant Thermal Oxidizer & PTE
C5	Coating Line C5	*	Thermal Oxidizer CD5 & PTE
C6	Coating Line C6	*	Thermal Oxidizer CD6 & PTE
PPC1	Printing/Coating Line PPC1	*	ABB Thermal Oxidizer & PTE
EU-3	Compound Formulation Process	Prior to 1963	Baghouse and Mixer Dust Filter System
C01-C028	28 Compound Curing Ovens	Prior to 1989	None
EU-5	Spray Paint Booth	Prior to 1980	Fabric Filter
B2-B9	8 Natural Gas Fired Boilers	1932	None

* Construction permits have been issued for emission units C5, C6 and PPC1. At the date of the issuance of this permit, they have not been constructed.

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. i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

ii. The operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with the requirements set forth by Condition 5.2.2(b) and shall be submitted to the Illinois EPA pursuant to 35 IAC 212.312.

iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program.

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

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 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

See Conditions 7.1.4, 7.2.4, 7.3.4, 7.4.4 and 7.5.4

5.4 Source-Wide Operational and Production Limits and Work Practices

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
Volatiles Organic Material (VOM)	358.43
Sulfur Dioxide (SO ₂)	0.52
Particulate Matter (PM)	76.34
Nitrogen Oxides (NO _x)	106
HAP, not included in VOM or PM	-----
TOTAL	541.29

5.5.2 Emissions of Hazardous Air Pollutants

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 NSR Explanation

Coating Lines PPC2, C3, and C4 have been constructed during the last five years and other coating lines were removed, as the new lines were replacement lines. Construction permits were issued for coating lines PPC1, C5 and C6 during the last five years. Netting projects were performed so that, although the new and proposed lines emit more than 25 tons of VOM per year, White Cap did not trigger the applicability of Illinois's New Source Review 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:

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

- b. Total annual HAP 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 a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

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 Operation Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of this permit, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year, starting with the 2000 ozone season, participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permit. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

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

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

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

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation", as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA, and obtain a Transaction Account prior to conducting any market transactions, pursuant to 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted in its application for a Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

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

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.650, 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 205.650(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.650, 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 are

not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 30 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, as it is a participating source, is 1,313 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 149.1158 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units

The source was issued a construction permit prior to January 1, 1998 for the following new or modified emission units for which three years of operational data is not yet available:

Emission Unit	Construction Permit #
Coating Line PPC1	97060085
Coating Line C4	96080019
Coating Line C5	97060085
Coating Line C6	97060085

In accordance with 35 IAC 205.310(h) and 205.320(f), the source shall submit a written request for, or an application for, a revised emissions baseline and allotment which address these emission units by December 1 of the year of the third complete seasonal allotment

period in which each such newly constructed or modified emission unit is operational. Such submittal shall include information from the affected emission units on the seasonal emissions for these first three seasonal allotment periods.

- c. Pursuant to 35 IAC Part 205, the Illinois EPA will issue ATUs to the source consistent with the above allotment of ATUs specified in Condition 6.8(a)(i), annually. These ATUs will be valid for the seasonal allotment period for which they are issued and, if not used for VOM emissions in this season, the following seasonal allotment period. Notwithstanding the above, part or all of the above allotment of ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs from the allotment by the source to another participant or the ACMA, in accordance with 35 IAC 205.530;
 - ii. Deduction of ATUs from the allotment as a consequence of emission excursion compensation, in accordance with 35 IAC 205.620; and
 - iii. Transfer of ATUs from the allotment to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.600(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and

(e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:

- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

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

Boilers

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

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Lithographic Coating Lines

Units PPC2, C3, C4, PC2, PC3, C9A, PC10A, C9B, C10B and Proposed Units C5, C6 and PPC1

7.1.1 Description

These metal decorating lines consist of printer coater lines and coating lines only. These lines coat metal sheets that are later formed into metal closures. The metal sheets are cured in ovens and the coating lines are controlled by oxidizers.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Emission Group	Emission Unit	Description	Emission Control Equipment
EG-1	PC2	Printing/Coating Line PC2	ABB Regenerative Thermal Oxidizer
EG-1	PC3	Printing/Coating Line PC3	ABB Regenerative Thermal Oxidizer
EG-1	C9A	Coating Line C9A	Catalytic Oxidizer CD2
EG-1	PC10A	Printing/Coating Line PC10A	Catalytic Oxidizer CD2
EG-1	C9B	Coating Line C9B	Catalytic Oxidizer CD3
EG-1	C10B	Coating Line C10B	Catalytic Oxidizer CD3
EG-2	PPC2	Printing/Coating Line PPC2	ABB Regenerative Thermal Oxidizer and Permanent Total Enclosure
EG-2	C3	Coating Line C3	ABB Regenerative Thermal Oxidizer and Permanent Total Enclosure
EG-2	C4	Coating Line C4	Quadrant Thermal Oxidizer and Permanent Total Enclosure
EG-2	C5	Coating Line C5	Thermal Oxidizer CD5 & PTE
EG-2	C6	Coating Line C6	Thermal Oxidizer CD6 & PTE
EG-2	PPC1	Printing/Coating Line PPC1	ABB Regenerative Thermal Oxidizer & PTE

* Construction permits have been issued for emission units C5, C6 and PPC1. At the date of the issuance of this permit, they have not been constructed.

7.1.3 Applicability Provisions and Applicable Regulations

- a. i. An "affected coating line" for the purpose of these unit-specific conditions, is a coating line listed in Condition 7.1.2.
- ii. Each affected coating line is subject to the emission limits identified in Condition 5.2.2.
- b. Each affected coating line shall comply with one of the following options pursuant to 35 IAC 218.207(b):
 - i. The coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency, or
 - ii. The system used to control VOM from the coating line is demonstrated to have an overall efficiency sufficient to limit VOM emissions to no more than what is allowed under 35 IAC 218.204. Such overall efficiency shall be determined as follows [35 IAC 218.207]:
 - A. Obtain the emission limitation from the appropriate subsection in 35 IAC 218.204.
 - B. Calculate S according to the following equation:

$$S = \frac{C}{1 - (C/D)}$$

Where:

S = The limitation on VOM emissions in terms of kg VOM/l (lbs VOM/gal) of solids

C = The limitation of VOM emissions in terms of kg/l (lbs/gal) of coating (minus water and any compounds which are specifically excluded from the definition of VOM) specified in Section 218.204 of this Part

D = The density of VOM in the coating. For the purposes of calculating S, the density is 0.882 kg VOM/l VOM (7.36 lbs VOM/gal VOM)

- C. Calculate the overall efficiency required according to the following equation:

$$E = ([VOM_a - VOM_1]/VOM_a) \times 100$$

Where:

E = Equivalent overall efficiency of the capture system and control device as a percentage

VOM_a = Actual VOM content of a coating, or the daily-weighted average VOM content of two or more coatings (if more than one coating is used), as applied to the subject coating line as determined by the applicable test methods and procedures specified in subsection (a) of this Section in units of kg VOM/l (lb VOM/gal) of coating solids as applied

VOM₁ = The VOM emission limit specified in 35 IAC 218.204 or 218.205 in units of kg VOM/l (lb VOM/gal) of coating solids as applied

- c. The subject capture systems and control devices must be operated at all times the affected coating lines are in operation [35 IAC 218.207(a)], except as noted in Condition 7.1.4a, when lines PC2, PC3, PC10A, PPC2, and/or proposed line PPC1 are run as printing only.
- d. Coating Lines C3-C6, PPC1 and PPC2 are subject to 35 IAC 212.321(a), which requires that:
- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)], or
 - ii. The emissions of particulate matter into the atmosphere in any one hour period from the subject coating lines shall not exceed the allowable emission rates specified by the

following equation which is equivalent to 35 IAC 212.321(c).

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

Where:

P = Process Weight Rate.

E = Allowable Emission Rate.

For process weight rates up to 408 Mg/hr (450 T/hr):

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

[35 IAC 212.321]

- e. Coating Lines C9A, C9B, C10B, PC2, PC3, and PC10A are subject to 35 IAC 212.322 which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any 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 prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)], or
 - ii. The emissions of particulate matter into the atmosphere in any one hour period from subject coating line shall not exceed the allowable emission rates specified by the following equation which is equivalent to 35 IAC 212.322(c).

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

Where:

P = Process Weight Rate.

E = Allowable Emission Rate.

For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based upon the lithographic printing at this source being exempt from the control requirements of 35 Ill. Adm. Code 218.407 due to the emissions from the lithographic printing being below the applicability level of 100 pounds of VOM per day on an average basis pursuant to 35 IAC 218.405(a).
- b. The affected coating lines are not subject to 35 IAC 218 Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption from General Rule on Use of Organic Material.

7.1.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel fired in the dryers and control devices.
- b. The thermal oxidizers combustion chambers shall be preheated to the manufacturer's recommended temperature but not lower than 1350°F, before the coating process is begun, and this temperature shall be maintained during operation of the affected coating lines.
- c. The Permittee shall follow good operating practices for the oxidizers, including periodic inspection, routine maintenance and repair of defects.
- d. The capture systems on coating lines C4, C3 and PPC2 (not including the print unit) shall be designed, operated, and maintained to provide permanent total enclosure, in accordance with the criteria in 35 IAC 218 Appendix B, Procedure T.

7.1.6 Emission Limitations

- a. Total emissions of VOM from lithographic coating and printing lines PPC1, PPC2, C3, C4, C5, and C6 shall not exceed 94.0 tons/year. Compliance with this limit shall be determined from a running total of 365 days of data.

The above limitations were established in Construction Permit 97060085 pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203. [T1]

- b. Construction permit 97060085 was issued based upon contemporaneous and creditable decreases in VOM emissions so that the net increase in VOM emissions is not significant. Therefore, these projects are not subject to 35 Ill. Adm. Code Part 203 Subpart C as a major modification. The accounting of increases and decreases for a 5 year period is shown in Attachment 2. The total contemporaneous increases, including the 6 new coating lines, is 94.44 ton/year. The total decrease in emissions, created by shutdown of Coating Lines PC4, C5, C6, C7, C8A and C8B is greater than 69.44 tons/year, so that the new increase is less than 25 tons/year.
- c. Emissions of nitrogen oxides (NO_x), carbon monoxide (CO) and operation of the fuel combustion equipment shall not exceed the following limits:

<u>Equipment</u>	<u>Firing Rate (mmBtu/hr)</u>	<u>NO_x Emissions (lb/mo)(T/yr)</u>	<u>CO Emissions (lb/mo)(T/yr)</u>
PPC2 Oven	5.8	447 2.63	149 0.88
C3 Oven	5.8	447 2.63	149 0.88
ABB Oxidizer	9.0	670 3.94	149 0.88
Quadrant Thermal Oxidizer	6.3	469 <u>2.76</u>	105 <u>0.62</u>
		11.96	3.26

These limits are based on maximum operation, continuous operation, natural gas being the fuel used and standard emission factors.

The above limitations were established in Construction Permits 95080159 and 96080019 pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203. [T1]

- d. Emissions of nitrogen oxides (NO_x), carbon monoxide (CO) and operation of the fuel combustion equipment shall not exceed the following limits:

<u>Equipment</u>	<u>Firing Rate (mmBtu/hr)</u>	<u>NO_x Emissions (Ton/yr)</u>	<u>CO Emissions (Ton/yr)</u>
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PPC1 Oven	6.3	2.76	0.62
C5 Oxidizer	6.3	2.76	0.62
C6 Oxidizer	6.3	<u>2.76</u>	<u>0.62</u>
		8.28	1.86

These limits are based on maximum operation, continuous operation, natural gas being the fuel used and standard emission factors.

The above limitations were established in Construction Permit 97060085 pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203. [T1]

7.1.7 Testing Requirements

- a. The owner or operator shall test all of its oxidizers for compliance with the destruction efficiency and capture efficiency requirements of 35 IAC 218.207 and 218.105 and report such results to USEPA and Illinois EPA within 30 days of VOM emission testing. These tests shall be performed between February, 1996 and within 60 days after the issuance of a final effective CAAPP permit. The capture efficiency test can be avoided for a coating line if the line is equipped and operated with permanent total enclosure pursuant to 35 IAC Appendix B, Procedure T.
 - i. Destruction efficiency testing shall be performed pursuant to USEPA Reference Methods 1 through 4, and 18, 25, or 25A, whichever is appropriate for each oxidizer.
 - ii.
 - A. Capture efficiency testing shall be performed pursuant to 35 IAC 218.105 or USEPA's Memorandum on Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions issued on February 7, 1995, by John S. Seitz, Office of Air Quality Planning and Standards and the Guidance Document Attached to this Memorandum, including the data Quality Objective or Lower Confidence Level Alternative Methods.
 - B. This authorizes use of alternative test methods, pursuant to 35 IAC 218.108(b), as USEPA's 1995 Guidance both modifies established test methods and outlines two new methods.

- iii. To demonstrate permanent total enclosure, testing shall be performed in accordance with 35 IAC Part 218, Appendix B, Procedure T.
 - iv. The Permittee shall provide to the Illinois EPA at least 30 days and USEPA at least 15 days prior to each capture or destruction efficiency test, a copy of the test protocol to be used to conduct the test. USEPA reserves the right to require changes to a test protocol.
 - v. The subsequent test report for each oxidizer shall include, at a minimum, the emission results with example calculations, process and control equipment data related to determination of compliance representativeness of process parameters and collected materials.
- b. Coating line C4 and associated thermal oxidizer shall be tested in accordance with the conditions of Construction Permit 96080019. Coating lines C5, C6 and PPC1 and associated thermal oxidizers shall be tested in accordance with the conditions of Construction Permit 97060085.
 - c. Upon request by the Illinois EPA, the VOM contents of coatings and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.211(a)].
 - d. Upon request by the Illinois EPA testing shall be performed to demonstrate that the capture systems for the coating lines complies with the criteria for a permanent total enclosure. This testing shall be performed in accordance with 35 IAC Part 218 Appendix B, Procedure T.

7.1.8 Monitoring Requirements

- a. Each thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, operated and maintained according to vendor specifications at all times the oxidizer is in use, in accordance with 35 IAC 218.105(d)(2). This monitoring equipment shall monitor and record the combustion chamber temperatures of the oxidizers [218.105(d)(2)].
- b. The catalytic oxidizers shall be equipped with continuous monitoring devices which are installed, calibrated, operated and maintained according to vendor specifications at all times the oxidizers are

in use. These monitoring devices shall monitor the temperature rise across each catalytic bed or VOM concentration of exhaust [218.105(d)(2)].

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each affected coating line:

- a. Control device monitoring data each day the oxidizer operates [35 IAC 218.211(e)(2)(B)].
- b. A log of the operating time for the capture system, control device, monitoring equipment and the coating operation [35 IAC 218.211(e)(2)(C)].
- c. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages [35 IAC 218.211(e)(2)(D)].
- d. The weight of VOM per volume of coating solids as applied each day on each coating line, if complying pursuant to 35 IAC 218.207(b)(2).
- e. The usage of each coating, ink and solvent in gallons or pounds on a daily basis.
- f. The VOM content of each coating, ink and solvent in pounds per gallon or pound per pound.
- g. The most recent stack test report for each coating line.

7.1.10 Reporting Requirements

The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of an affected coating line with the permit requirements within 30 days of the violation 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.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with VOM emission limits for the affected coating lines shall be based on the emission factors and formulas listed below:

- i. For coatings applied during the coating process:

Coating VOM Emissions = Computer calculated coating usage x VOM content of the coatings x (1 - Overall Control Efficiency)

Where: Computer calculated coating usage = a mainframe computer calculation that takes the coatings standards and Job Number data and combines it with daily production data inputs to come up with a coating usage per coating type per line per day.

Standard data includes gallons per base box ratios for all coatings and base box size definition.

Job number data includes coating type, applied coating thickness in milligram weight per 4 square inches and sheet size.

Production input data includes per line daily inputs of job number, coating type and total sheets run.

- ii. For solvents used in relation to the coating process on lines with permanent total enclosures:

Solvent VOM Emissions = Hours of operation x lbs per hour solvent evaporation rate x (1 - Overall Control Efficiency)

Where: Hours of operation = total hours per day that solvent is on the line, ready for use in the coating operation. This also includes the hours for coater wash-ups, because the same solvent is used in the wash-up operation.

Lbs per hour solvent evaporation rate = 2.1

This rate was derived from a controlled experiment whereby the solvent evaporation rate was determined for solvent used in the coater roll wash operation during the coating process. This rate is also

used for solvent evaporation during
coater wash-ups.

- iii. For inks and solvents used in relation to the
printing process:

VOM Emissions = Lbs of Material x VOM content
of Material x (1 - Overall Control Efficiency)

Where: Overall Control Efficiency = Capture
Efficiency x Destruction Efficiency

Overall Control Efficiency (Solvent) = 0

Capture Efficiency (Ink) = 0.5

Destruction Efficiency (Ink) = Stack
tested value

- iv. For solvents used in relation to the coating
process on lines without permanent total
enclosures:

VOM Emissions = Hours of operation x lbs per
hour solvent evaporation rate*

* See Condition 7.1.12(a)(ii)

- b. In order to demonstrate compliance with the annual
limits in Conditions 7.1.6(a) and (b), VOM emissions
shall at least be calculated on a monthly basis and
when periodically requested by the Illinois EPA or
USEPA.
- c. Compliance provisions addressing Condition 7.1.3(d)
and (e) are not set by this permit as compliance is
assumed to be achieved by the normal work practices
and maintenance activities inherent in operation of
an affected coating line.

7.2 Unit EU-3 Compound Formulation Process

7.2.1 Description

Emission unit EU-3 consists of 3 mixers and unloading and pneumatic transfer of raw materials. These items are all controlled by particulate matter filters.

Plasticizers, PVC resin and other miscellaneous materials are being mixed and are the ingredients for a gasket seal compound.

7.2.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EU-3	Compound Formulation Process	Baghouse and Mixer Dust Filter System

7.2.3 Applicability Provisions and Applicable Regulations

- a. i. An "affected compound formulation process" for the purpose of these unit specific conditions is a compound formulation process listed in Condition 7.2.2.
- ii. Each affected compound formulation process is subject to the emission limits identified in Condition 5.2.2.
- b. The affected compound formulation process is subject to 35 IAC 212.322, 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 process unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified below.

Metric Process Weight (Mg/hr)	Allowable Particulate Matter Emission (Kg/hr)	English Process Weight (T/hr)	Allowable Particulate Matter Emission (lbs/hr)
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40

Metric Process Weight (Mg/hr)	0.89 Allowable Particulate Matter Emission (Kg/hr)	0.30 English Process Weight (T/hr)	1.83 Allowable Particulate Matter Emission (lbs/hr)
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.	8.7	10.00	19.20
13.	11.1	15.00	25.20
18.	13.8	20.00	30.50
23.	16.2	25.00	35.40
27.	18.15	30.00	40.00
32.	18.8	35.00	41.3

ii. Interpolated and extrapolated values of the data in subsection (a)(i) of this Section shall be determined by using the equation:

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

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0.00	0.00

c. The owner or operator shall not cause or allow the discharge of more than 3.6 Kg/hr (8 lbs/hr) of organic material into the atmosphere from the affected compound formulation process [35 IAC 218.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.

7.2.4 Non-Applicability of Regulations

The affected compound formulation process is not subject to the control requirements of 35 IAC 218 Subpart QQ because VOM emissions from this process is below the applicability level of 25 tons of VOM per year [35 IAC 218.940].

7.2.5 Operational and Work Practice Requirements

The owner or operator shall follow good operating practices for the baghouse and mixer dust filter system including periodic inspection, routine maintenance, repair of defects and visual emission checks.

7.2.6 Emission Limitations

N/A

7.2.7 Testing Requirements

N/A

7.2.8 Monitoring Requirements

N/A

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following for the compound formulation process:

- a. Operating records of material throughput on a monthly basis in tons.
- b. A maintenance log for the control equipment detailing all routine and nonroutine maintenance performed.

7.2.10 Reporting Requirements

The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of the affected compound formulation process with the permit requirements within 30 days of the violation 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.

7.2.11 Operational Flexibility

N/A

7.2.12 Compliance Procedures

Compliance provisions addressing Condition 7.2.3(b) and (c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected compound formulation process.

7.3 Units C01-C028 Compound Curing Ovens

7.3.1 Description

Plastisol compound is cured to create a plastic gasket inside the caps. There are 28 curing ovens each having a firing rate of 1.5 or 1.6 mmBtu per hour.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Emission Units	Description	Emission Control Equipment
C01 through C028	28 Compound Curing Ovens	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. i. An "affected curing oven" for the purpose of these unit specific conditions is curing oven listed in Condition 7.3.2.
- ii. Each affected curing oven is subject to the emission limits identified in Condition 5.2.2.
- b. The owner or operator shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any affected curing oven [35 IAC 218.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.
- c. All compounding curing ovens with the exception of C015, C016 and C017 are subject to 35 IAC 212.322. See Condition 7.2.3(b) for detailed requirements of this regulation.
- d. Compounding curing ovens C015, C016 and C017 are subject to 35 IAC 212.321, 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 which either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified below.

<u>Metric Process Weight (Mg/hr)</u>	<u>Allowable Particulate Matter Emission (Kg/hr)</u>	<u>English Process Weight (T/hr)</u>	<u>Allowable Particulate Matter Emission (lbs/hr)</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	2.1	2.00	3.70
2.7	2.4	3.00	4.60
3.6	2.7	4.00	5.35
4.5	3.9	5.00	6.00
9.	4.8	10.00	8.70
13.	5.7	15.00	10.80
18.	6.5	20.00	12.50
23.	7.1	25.00	14.00
27.	7.7	30.00	15.60
32.	18.8	35.00	17.00

ii. Interpolated and extrapolated values of the data in subsection (a)(i) of this Section shall be determined by using the equation:

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

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

Up to process weight rate of 408 Mg/hr (450 T/hr):

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

7.3.4 Non-Applicability of Regulations

The affected curing ovens are not subject to the control requirements of 35 IAC 218 Subpart QQ because VOM emissions from this process is limited below 25 tons of VOM per year [35 IAC 218.940].

7.3.5 Operational and Work Practices

- a. Natural gas shall be the only fuel fired in the affected curing ovens.

7.3.6 Emission Limitations

Operation and emissions of the affected compound curing ovens combined shall not exceed the following limits:

<u>Gasket Compound Usage</u> (ton/year)	<u>VOM Emissions</u> (ton/year)
18,750	15.0

These limits are based on maximum operation and stack test emission factor of 1.6 lb VOM/ton of gasket compound. Compliance with annual limits shall be determined from a running total of 12 months of data.

The above limitations were established in Construction Permit 97060085 pursuant to 35 IAC 203. These limits ensure that the construction/modification addressed in the aforementioned construction permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203. [T1]

7.3.7 Testing Requirements

N/A

7.3.8 Inspection Requirements

Visual emission checks shall be made monthly. Observation of high visible emissions shall initiate evaluation of the process for possible problem.

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following for the affected curing ovens:

- a. Aggregate of monthly compound usage in tons.
- b. Visible emissions on a monthly basis. This shall be recorded as low, typical or high.
- c. MSDS sheets of plastisols used or materials used to make the plastisols.
- d. Aggregate monthly hours of operation for the compounding curing ovens.
- e. Calculations of maximum hourly VOM and PM emissions.

7.3.10 Reporting Requirements

The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of an affected curing oven with the permit requirements within 30 days of the violation 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.

7.3.11 Operational Flexibility

N/A

7.3.12 Compliance Procedures

- a. Compliance with the PM limitations of Condition 7.3.3 is addressed by applying the emission factor obtained by stack testing and the recordkeeping required by Condition 7.3.9. Aggregate PM emissions may be determined for all compound curing ovens combined. PM emissions = total gasket compound usage x 6.2 lb/ton of compound. Compliance is determined on a unit basis, i.e., the process weight rate = total compound usage in lb/hr divided by number of gasket machines operating.

$$\begin{array}{l} \text{Emission} \\ \text{Factor} \quad \underline{6.2 \text{ lb PM}} \\ \text{From} \quad = \text{Ton Compound} \\ \text{Stack} \quad \text{Applied} \\ \text{Testing} \end{array}$$

- b. Compliance with the organic material limitations are addressed by applying the emission factor obtained by stack testing and the recordkeeping required by Condition 7.3.9. Aggregate organic material emissions may be determined for all compound curing ovens combined.

$$\begin{array}{l} \text{Emission} \\ \text{Factor} \quad \underline{1.6 \text{ lb VOM}} \\ \text{From} \quad = \text{Ton Compound} \\ \text{Stack} \quad \text{Applied} \\ \text{Testing} \end{array}$$

$$\begin{array}{r}
 \text{Organic} \\
 \text{Material} \\
 \text{Emissions}
 \end{array}
 = \frac{\text{Total Gasket Compound Usage (Tons)} \times 1.6 \text{ lb VOM}}{\text{Ton}}$$

7.4 Unit EU-5 Spray Paint Booth

7.4.1 Description

The spray paint booth will be used to apply coatings to miscellaneous industrial machinery and parts used on and off-site. The booth is equipped with a fabric filter to control particulate matter. This booth is considered a separate source for VOM emissions based on it being classified under a different SIC number and more than 50% of the products from this booth are sold to customers outside of White Cap. It is classified as a different SIC number because this booth is used in the process of refurbishing industrial machines.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EU-5	Spray Paint Booth	Fabric Filter

7.4.3 Applicability Provisions and Applicable Regulations

- a. i. An "affected spray booth" for the purpose of these unit specific conditions is a spray booth listed in Condition 7.4.2.
- ii. The affected spray booth is subject to the emission limits identified in Condition 5.2.2.
- b. The owner or operator shall not cause or allow the discharge of more than 3.6 Kg/hr (8 lbs/hr) of organic material into the atmosphere from any affected spray booth [35 IAC 218.301]. If no odor nuisance exists this limitation shall apply only to photochemically reactive material.
- c. The affected spray paint booth is subject to 35 IAC 212.322, 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 process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)], or
 - ii. The allowable particulate matter emission limits for the affected spray booths shall be

calculated based upon the following emission factors and formulas:

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

Where:

E = Allowable particulate matter emission rate

P = Process weight rate

For process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

7.4.4 Non-Applicability of Regulations of Concern

The coating VOM content limitations of 35 IAC 218.204 shall not apply to the affected spray booth because VOM emissions from this emission unit do not exceed 15 pounds per day [35 IAC 218.208].

7.4.5 Operational and Production Limits and Work Practice Requirements.

N/A

7.4.6 Emission Limitations

The VOM emissions from the affected spray booth shall not exceed 15 pounds per day pursuant to 35 IAC 218.208.

7.4.7 Testing Requirements

Upon request by the Illinois EPA, the VOM contents of coatings shall be determined by the applicable test methods specified in 35 IAC 218.105.

7.4.8 Monitoring Requirements

N/A

7.4.9 Recordkeeping Requirements

The owner or operator of the affected spray booth shall maintain the following records:

- a. The name and identification number of each coating as applied [35 IAC 218.211(b)(2)].
- b. 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 in units of pounds per gallon [35 IAC 218.211(b)(2)].
- c. Daily usage of each coating in gallons or pounds.

7.4.10 Reporting Requirements

The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of an affected spray booth with the permit requirements within 30 days of the violation 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.

7.4.11 Operational Flexibility

N/A

7.4.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.4.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected spray booth.
- b. Compliance with VOM emission limitations shall be calculated as follows:

VOM Emissions = (Coating or Solvent Usage) x (VOM Content of Material)

7.5 Units B2 - B9 Natural Gas Fired Boilers

7.5.1 Description

Natural gas fired boilers are being operated. Boilers B6 - B9 and B4 are below 10 mmBtu/hr capacity. Boilers B2, B3 and B5 are above 10 mmBtu/hr and none exceeds 16.5 mmBtu/hr.

7.5.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
B2 - B9	8 Natural Gas Fired Boilers	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. i. An "affected boiler" for the purpose of these unit specific conditions, is each boiler listed in Condition 7.5.2.
- ii. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from boilers B2, B3 and B5 to exceed 200 ppm, corrected to 50 percent excess air on a per boiler basis [35 IAC 216.121].

7.5.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to NSPS, 40 CFR 60 Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating unit was constructed, modified, or reconstructed prior to June 9, 1989 which is the applicability date.
- b. Boilers B6-B9 and B4 are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission sources, since the actual heat input from each boiler is less than 2.9 MW (10 mmBtu/hr).
- c. The affected boilers are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of the boilers is less than 73.2 MW (250 mmBtu/hr).
- d. The affected boilers are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.303, Fuel Combustion Emission Sources, which excludes the affected boilers from this requirement.

7.5.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected boilers.

7.5.6 Emission Limitations

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

N/A

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

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

- a. Source fuel usage (ft³/yr), and
- b. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.5.12 (ton/yr).

7.5.10 Reporting Requirements

The Permittee shall notify the Illinois EPA Compliance Section of noncompliance of an affected boiler with the permit requirements within 30 days of the violation 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.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.5.12 Compliance Procedures

- a. Compliance with Condition 7.5.3(b) is assumed to be achieved by the work practices inherent in operation of a natural gas-fired boiler, thus no compliance procedures are set in this permit addressing this regulation.

- b. To determine compliance with Condition 5.5.1 emissions from the natural gas fired equipment shall be based on the emission factors listed below:

<u>Pollutant</u>	<u>Natural Gas Emission Factors for Boilers (lb/10⁶ ft³)</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 boilers, Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement F, March, 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, ft³) x
(The Appropriate Emission Factor)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after March 17, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written

notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

<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 (MC 40)
Bureau of Air
Compliance Section
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section (MC 11)
Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch
USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

The Permittee shall submit compliance certifications annually no later than May 1 of the following year, or more frequently as specified in the applicable requirement or by permit condition pursuant to Section 39.5(7)(p)(v) of the Act. Compliance

certifications shall be submitted to the Illinois EPA - Air Compliance Section. Copies shall be submitted to the Illinois EPA - Air Regional Office and to the USEPA Region 5 - Air Branch.

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)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2

Netting Table from Construction Permit 97060085
Emissions Increases and Decreases
Five Year Period

		VOM
<u>Emissions</u>		
<u>Project</u>		
<u>(Tons/Year)_</u>		
1.	Permitted Emission Increases	
	A. Coating Line C5	
	94.0*	
	B. Coating Line PPC1	
	C. Coating Line C6	
	D. Coating Line C4	October 1997
	E. Coating Lines PPC2 and C3	October 1995
	F. Soil Vapor Extractor	October 1993
	<u>0.44</u>	
		Total
	94.44	
2.	Minimum Available Emission Decreases (See Tables II, III and IV)	
	A. Coating Lines C8A and C8B	72.8
	B. Coating Lines PC4, C5, C6, and C7	<u>130.0</u>
		Total
	202.8**	
3.	Netting Evaluation	
	The net increase in VOM emissions is below 25 tons/year after the contemporaneous increases and decreases are considered.	
*	Six new coating lines limited to 94.0 tons/year.	
**	Estimated emissions based on historical data for use and VOM content of coating materials and performance of the control systems. This information shows more than adequate actual emissions decreases from the shutdown of	

the existing coating lines so that the new lines will not result in a significant net increase in VOM emissions.

These VOM emission estimates are not permit limits but are to be used for netting evaluation purposes only.

DWH:jar