

FINAL DRAFT/PROPOSED CAAPP RENEWAL PERMIT  
Arlington Plating Company  
I.D. No.: 031234AAP  
Application No.: 95120034  
January 24, 2004

217/782-2113

"RENEWAL"  
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Arlington Plating Co  
Attn: Tom Galaida  
600 South Vermont Street  
Palatine, Illinois 60078-0974

Application No.: 95120034                      I.D. No.: 031234AAP  
Applicant's Designation:                      Date Received: December 5, 1995  
Operation of: Metal Polishing and Plating  
Date Issued: TO BE DETERMINED              Expiration Date<sup>2</sup>: DATE  
Source Location: 600 South Vermont Street, Palatine, Cook  
Responsible Official: Richard Macary, Vice President

This permit is hereby granted to the above-designated Permittee to OPERATE a miscellaneous metal parts polishing, plating and painting operation, pursuant to the above-referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:JS:psj

cc: Illinois EPA, FOS Region 1  
CES  
Lotus Notes

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

<sup>2</sup> Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Arlington Plating Company  
600 South Vermont Street  
Palatine, Illinois 60078-0974  
847/359-1490

I.D. No.: 031234AAP  
Standard Industrial Classification: 3471, Metal Polishing and  
Plating

1.2 Owner/Parent Company

Arlington Plating Company  
600 South Vermont Street  
Palatine, Illinois 60078-0974

1.3 Operator

Arlington Plating Company  
600 South Vermont Street  
Palatine, Illinois 60078-0974

Tom Galaida  
847/359-1490

1.4 General Source Description

Arlington Plating Company is located at 600 South Vermont Street in Palatine, Illinois. Arlington Plating Company conducts polishing, plating, and painting of miscellaneous metal parts.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), 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
°C	degree Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
cm	centimeter
dscf	dry standard cubic foot
dscm	dry standard cubic meter
ERMS	Emissions Reduction Market System
°F	degree Fahrenheit
ft	feet
ft <sup>3</sup>	cubic foot
hr	hour
HAP	Hazardous Air Pollutant
gal	gallon
gr	grain
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
in	inch
kg	kilogram
lb	pound
m	meter
MACT	Maximum Achievable Control Technology
mg	milligram
Mg	Megagram
mmBtu	Million Btus
min	minute
mo	month
MW	Megawatt
NESHAP	National Emission Standard for Hazardous Air Pollutant
NO <sub>x</sub>	Nitrogen Oxides
O & M	Operation & Maintenance
OSHA	Occupational Safety and Health Administration
PM	Particulate Matter

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ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
SOP	Standard Operating Procedure
T	ton
T1	Title I - identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - Identifies Title I conditions that are being established in this permit
T1R	Title I Revised - Identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt	weight
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

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

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

Storage Tanks (STTK 1 and STTK 2)  
Small Gas Fired Batch Oven (HL2-1)

- 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:

Alkaline Cleaning Tanks  
Nickel Plating Tanks  
Acid Pickle Deoxidizing  
Process Steam Boiler 1  
Hot Water Heating Boiler 3  
Stand-By Steam Boiler 2  
Heated Air Makeup Unit 1

- 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:

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

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

#### 3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
  - 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
  - 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.3 Addition of Insignificant Activities
- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
  - 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
  - 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
05	Decorative Chrome Plating Tank (H2)	1976	Fume Suppressant Wetting Agent
06	Decorative Chrome Plating Tank-Hand Line (HL1-2)	1975	Fume Suppressant Wetting Agent
07	Decorative Chrome Plating Tank-Hand Line (HL2-2)	1987	Fume Suppressant Wetting Agent
08	Solvent Degreaser 1 (D-1)	12/1997	Working-Mode Cover, Freeboard Refrigeration Device, and Superheated Vapor
09	Solvent Degreaser 2 (D-2)	12/1997	Working-Mode Cover, Freeboard Refrigeration Device, and Superheated Vapor

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.1.2 This permit is issued based on the source being a major source of HAPs.

5.2 Applicable Regulations

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

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

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minute period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any such emission unit owned and operated by the Permittee and provided further that such more opaque emissions permitted from each such unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).

5.2.3 Ozone Depleting Substances

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

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

5.2.4 Risk Management Plan

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

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

- 5.2.5
- 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
Volatile Organic Material (VOM)	71.38
Sulfur Dioxide (SO <sub>2</sub> )	0.04
Particulate Matter (PM)	1.74
Nitrogen Oxides (NO <sub>x</sub> )	7.14
HAP, not included in VOM or PM	-----
Total	80.30

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the Clean Air Act being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a major source for HAPs.

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

5.6 General Recordkeeping Requirements

5.6.1 As a substitute for specific records for affected emission units pursuant to Section 7, the Permittee may 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:

None

- 5.6.2 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.

- 5.6.3 Retention and Availability of Records

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

- 5.7 General Reporting Requirements

- 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the requirements of this permit 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:

Annual emissions from the source in excess of the limits specified in Condition 5.5.1, within 30 days of such an occurrence.

- 5.7.2 Annual Emission Report

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

- 5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7 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. 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 emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its 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 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
  - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

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

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

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

#### 6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(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 205.750, 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 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 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 243 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 24.43 tons.
    - A. This determination includes the use of 1995 and 1996 as baseline seasons.
  - 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
- 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 emission excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

#### 6.9 Recordkeeping for ERMS

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

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

6.10 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)]:

1. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
2. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
3. 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)]:

2 Solvent Degreasers  
Boilers  
Air Make-Up Units

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

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Units 05-07: Decorative Chrome Plating Tanks

7.1.1 Description

Customer's raw metal parts are accepted in the receiving department where they are weighed or counted, and a job ticket is produced which describes the customer's finish requirements. The parts are routed for processing.

Parts requiring polishing prior to plating are routed to the polishing department where they are manually polished and/or buffed prior to the plating operation. After polishing, the parts are precleaned using a trichloroethylene vapor degreaser.

Parts routed to the plating department are racked on plating racks and either hand carried or hoist transferred through the plating cycle. The cycle typically includes hot alkaline cleaning and hot alkaline electrocleaning to remove particulate or oily soils. Following is acid cleaning to remove oxides to provide a chemically clean surface prior to the actual single plating step (such as zinc plating) or multiple steps (such as copper, nickel, and chromium). The parts are rinsed in running water rinses between and after the several intermediate cleaning and plating operations. After the final rinse, the parts are dried by either hot drying, spin drying, or wiping.

Decorative chrome plating tanks H2 and HL1-2 were installed in 1975 and decorative chrome plating tank HL2-2 was installed in 1988. The decorative chrome plating tanks are controlled by maintaining the proper surface tension with a fume suppressant wetting agent. Consequently, the initial performance tests required by 40 CFR 63, Subpart N were waived by the Illinois EPA. Wet scrubbers are also used, but are not necessary to demonstrate compliance.

7.1.2 List of Emission Units and Pollution Control Method

Emission Unit	Description	Emission Control Method
05	Decorative Chrome Plating Tank (H2)	Fume Suppressant Wetting Agent
06	Decorative Chrome Plating Tank - Hand Line (HL1-2)	Fume Suppressant Wetting Agent

Emission Unit	Description	Emission Control Method
07	Decorative Chrome Plating Tank - Hand Line (HL2-2)	Fume Suppressant Wetting Agent

7.1.3 Applicable Regulations

- a. The "affected chrome plating lines" for the purpose of these unit-specific conditions, are the decorative chrome plating tanks as specified in Condition 7.1.2.
- b. The affected chrome plating lines are subject to 40 CFR 63 Subpart A and N, National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The NESHAP compliance date for decorative chromium plating was January 25, 1996.
- c. Each affected chrome plating line at the source is 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 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 in subsection (c) of 35 IAC 212.321 (see Attachment 2) [35 IAC 212.321(a)].

7.1.4 Non-Applicability of Regulations of Concern

None

7.1.5 Operational and Work Practices

- a. Pursuant to 40 CFR 63.342(f), the Permittee shall implement the work practice requirements for chrome decorative electroplating tanks(s). The work practice standard shall address at least the following:
  - i. At all times, including periods of startup, shutdown, and malfunction, the owner or operator shall operate and maintain any

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affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by Condition 7.1.5(b) [40 CFR 63.342(f)(1)(i)].

- ii. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by Condition 7.1.5(b) [40 CFR 63.342(f)(1)(ii)].
  - iii. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards [40 CFR 63.342(f)(1)(iii)].
  - iv. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Illinois EPA, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source [40 CFR 63.342(f)(2)].
- b. Pursuant to 40 CFR 63.342(f)(3), the owner or operator shall implement an operation and maintenance (O & M) Plan as follows:
- i. The plan shall provide a description of the fume suppressant with wetting agent in use and shall include a checklist to document the operation and maintenance of the this equipment [40 CFR 63.342(f)(3)(i)(A)].
  - ii. Pursuant to 40 CFR 63.342(f)(3)(i)(B), the plan shall incorporate proposed work practice standards for the add-on air pollution control device or monitoring equipment, as identified in Table 1 of 40 CFR 63.342, as follows:
    - A. For the stalagmometer, follow manufacturer's recommendations.
  - iii. The plan shall specify procedures to be followed to ensure that fume suppressant with

wetting agent malfunctions due to poor maintenance or other preventable conditions do not occur [40 CFR 63.342(f)(3)(i)(D)].

- iv. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices (if any), and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions [40 CFR 63.342(f)(3)(i)(E)].
- v. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events [40 CFR 63.342(f)(3)(ii)].
- c. To satisfy the requirements of Condition 7.1.5(b), the Owner or operator may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, provided the alternative plans meet the requirements of this section [40 CFR 63.342(f)(3)(vi)].

7.1.6 Emission Limitations

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

- a. Decorative chromium electroplating tank(s) using a fume suppressant containing a wetting agent shall not exceed the following limits pursuant to 40 CFR 63.342(d)(2):

<u>Emission Unit</u>	<u>Surface Tension (dynes/cm)</u>
05	45
06	45
07	45

This limit is based on Maximum Achievable Control Technology (MACT) control performance standard for decorative chromium electroplating tank(s). Compliance with this limit shall be determined from ongoing compliance monitoring, as required by Condition 7.1.8.

- b. The Permittee shall operate the fume suppressant wetting agent at all times during the operation of decorative electroplating tank(s).

#### 7.1.7 Testing Requirements

Pursuant to Section 39.5(7) (b) of the Act, testing for chromium emissions from the affected chrome plating tanks shall be performed upon reasonable request by the Illinois EPA as follows:

- a. Surface tension of decorative chromium electroplating tank(s) shall be measured to demonstrate initial compliance pursuant to 40 CFR 63.343(b), during conditions which are representative of maximum emissions, i.e., at maximum rated rectifier capacity of tank(s). This test may be waived by the Illinois EPA as provided in 40 CFR 63.343(b) (2) (See Condition 7.1.7(d)).
- b. Pursuant to 40 CFR 63.344(c), the following methods and procedures shall be used for performance testing, unless another method is approved by the Illinois EPA: Refer to 40 CFR 63, Appendix A, for USEPA test methods.

Chromium Concentration:	USEPA Method 306 or 306A
Surface Tension:	USEPA Method 306B

- c. During testing, the site-specific "operating parameter value", i.e., surface tension, will be established to demonstrate continuous compliance. Maximum surface tension can be established from the three compliant test runs. In lieu of establishing the maximum surface tension during the performance test, a maximum surface tension of 45 dynes/cm can be used to correspond to compliance with the applicable emission limitation [40 CFR 63.343(c) (5) (i)].

- d. Pursuant to 40 CFR 63.343(b)(2), the Illinois EPA may waive the initial performance test as described above, if the owner or operator meets the following criteria:
  - i. Use a chemical fume suppressant containing a wetting agent for the decorative chromium electroplating tank; and
  - ii. Limit the surface tension of the bath to a maximum of 45 dynes/cm at any time during operation of the decorative chromium electroplating tank.

#### 7.1.8 Monitoring Requirements

- a. Pursuant to 40 CFR 63.343(c), the owner or operator of an affected source subject to the emission limitations of 40 CFR 63 Subpart N shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The owner or operator of an affected source shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected source at a surface tension greater than the value established during the performance test, or greater than 45 dynes/cm if the owner or operator is using this value in accordance with 40 CFR 63.343(5)(i), shall constitute noncompliance with the standards. The surface tension shall be monitored according to the following schedule:
  - i. The surface tension shall be measured once every 4 hours during operation of the tank with stalagmometer or a tensionmeter as specified in Method 306B, Appendix A of 40 CFR Part 63 Subpart N.
  - ii. The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurements may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation on this schedule, surface tension measurements may be conducted once every 40 hours of tank

operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this section is once every 40 hours of tank operation.

- iii. Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph 7.1.8(a) (ii). For example, if an owner or operator had been monitoring an affected source once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
- b. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected source are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system [40 CFR 63.344(d) (2)].
  - i. Specifications for differential pressure measurement devices used to measure velocity pressure shall be in accordance with section 2.2 of Method 2 (40 CFR part 60, appendix A) [40 CFR 63.344(d) (2) (i)].
  - ii. Specification for differential pressure measurement devices used to measure pressure drop across a control system shall be in accordance with manufacturer's accuracy specifications [40 CFR 63.344(d) (2) (ii)].

#### 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 chrome plating lines to demonstrate

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compliance with Conditions 5.5.1, 7.1.3, 7.1.5, and 7.1.6 pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall keep the following records, pursuant to 40 CFR 63.346(b), to demonstrate continuous compliance:
  - i. Records of monitoring data required by 40 CFR 63.343(c)(5)(ii), i.e., plating bath surface tension, determined every four hours except as provided by Condition 7.1.8.
  - ii. Records of all maintenance performed on the affected source, the fume suppressant wetting agent and monitoring equipment.
  - iii. Records of the occurrence, duration, and cause (if known) of each malfunction of process, fume suppressant wetting agent and monitoring equipment.
  - iv. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.
  - v. Records, which may take the form of checklists, necessary to demonstrate consistency with the operation and maintenance plan required by 40 CFR 63.342(f)(3).
  - vi. Test reports documenting results of all performance tests, if performance test were conducted.
  - vii. All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of 40 CFR 63.344(e).
  - viii. Records of monitoring data required by 40 CFR 63.343 that are used to demonstrate compliance with the standard including the date and time the data are collected.
  - ix. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during

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malfunction of the process, mist eliminator or monitoring equipment.

- x. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the subject chrome plating tanks and associated control devices.
  - xi. The total process operating time of the affected chrome plating tank(s) during the reporting period.
  - xii. Records of the date and time that fume suppressant wetting agents are added to the bath.
  - xiii. All documentation supporting the notifications and reports required by 40 CFR 63.9, 63.10 and 63.347.
  - xiv. All records shall be maintained for a period of five years in accordance with 40 CFR 63.10(b)(1).
- b. The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Illinois EPA and/or USEPA for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR 63 Subpart N. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Illinois EPA and/or USEPA for a period of 5 years after each revision to the plan [40 CFR 63.342(f)(3)(v)].
- c. Records of the testing of chromium emissions from the affected plating tanks 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. The operating schedule of the affected chrome plating lines.
  - e. Annual PM emissions from the affected chrome plating lines, with supporting calculations.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected plating tank 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 Permittee shall also comply with the following reporting requirements, pursuant to 40 CFR 63.347:

- a. The owner or operator of a new or reconstructed affected source shall submit initial notification of construction/reconstruction to the Illinois EPA, in addition to the notification required by 40 CFR 63.345(b), as follows:
  - i. A notification of the date when construction or reconstruction was commenced, shall be submitted no later than 30 calendar days of construction or reconstruction commencement date.
  - ii. A notification of the actual date of startup of the source shall be submitted within 30 calendar days after such date.
- b. i. The owner or operator shall notify the Illinois EPA in writing of intent to conduct a performance test (if conducted) at least 60 calendar days before the test is scheduled to begin to allow the Illinois EPA to have an observer present during the test, pursuant to

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40 CFR 63.347(d). Observation of the performance test by the Illinois EPA is optional [40 CFR 63.347(d)(1)].

- ii. If the scheduled date for the test is changed for unforeseen reason, the Permittee shall inform the Illinois EPA within 5 calendar days of the originally scheduled test date and must specify the date of the rescheduled test [40 CFR 63.347(d)(2)].
- c. The owner or operator shall submit to the Illinois EPA a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the affected source has complied with 40 CFR 63, Subpart N, pursuant to 40 CFR 63.347(e). The notification shall list the following:
  - i. The applicable emission limitation and the methods that were used to determine compliance with this limitation.
  - ii. The performance test report documenting the results of the performance test, which contains the elements required by 40 CFR 63.344(a), including measurements and calculations to support the special compliance provisions of 40 CFR 63.344(e) if these are being followed.
  - iii. The type and quantity of hazardous air pollutants emitted by the source in mg/dscm. For sources not required to conduct a performance test in accordance with 40 CFR 63.343(b), the surface tension measurement may fulfill this requirement.
  - iv. For each monitored parameter for which a compliant value is to be established, the specific operating parameter value, or range of values, that corresponds to compliance with the applicable emission limit.
  - v. The methods that will be used to determine continuous compliance, including a description of monitoring and reporting requirement, if methods differ from those identified in 40 CFR 63, Subpart N.

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- vi. A description of the air pollution control technique for each emission point.
  - vii. A statement that the owner or operator has completed and has on file the operation and maintenance plan as required by the work practice standards of 40 CFR 63.342(f).
  - viii. A statement by the owner or operator of the affected source as to whether the source has complied with the provisions of 40 CFR 63, Subpart N.
- d. The notification of compliance status and reports of performance test results (if conducted) shall be submitted to the Illinois EPA no later than 90 calendar days following completion of the compliance demonstration/performance test.
- e. Pursuant to 40 CFR 63.347(h), the owner or operator shall prepare an ongoing compliance status report every year except as provided by Condition 7.1.10(f). The report shall be retained on site and made available to the Illinois EPA upon request. The ongoing compliance report shall contain the following information:
- i. The company name and address of the affected source.
  - ii. An identification of the operating parameter that is monitored for compliance determination.
  - iii. The relevant emission limitation (i.e. surface tension in dynes/cm) for the source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status.
  - iv. The beginning and ending dates of the reporting period.
  - v. A description of the type of process performed in the source.

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- vi. The total operating time of the affected source during the reporting period.
  - vii. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
  - viii. A certification by a responsible official that the work practice standards in Condition 7.1.5 were followed in accordance with the operation and maintenance plan for the source.
  - ix. If the operation and maintenance plan was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) documenting that the operation and maintenance plan was not followed.
  - x. A description of any changes in monitoring processes, or controls since the last reporting period.
  - xi. The name, title, and signature of the responsible official who is certifying the accuracy of the report.
  - xii. The date of the report.
- f. Reports of Exceedances
- i. Pursuant to 40 CFR 63.347(h)(2), if both of the following conditions are met, semiannual reports shall be prepared and submitted to the Illinois EPA:
    - A. The total duration of excess emissions (as indicated by the monitoring data collected by the owner or operator in

accordance with Condition 7.1.8) is 1 percent or greater of the total operating time for the reporting period.

- B. The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time.
- ii. Once an owner or operator of an affected source reports an exceedance as defined in Condition 7.1.10(f) (i), ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency under Condition 7.1.10(f) (iii) is approved.
- iii. An owner or operator who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report onsite if all of the following conditions are met:
  - A. For one full year, the ongoing compliance status reports demonstrate that the affected source is in compliance with the relevant emission limit;
  - B. The owner or operator continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Subparts A and N; and
  - C. The Illinois EPA does not object to a reduced reporting frequency for the affected source.
- g. The owner or operator shall report the results for each monitoring device. However, when one monitoring device is used as a backup for the primary monitoring device, the Owner or operator shall only report the results from the monitoring device used to meet the monitoring requirements. If both devices are used to meet these requirements, then the owner or operator shall report the results from each monitoring device for the relevant compliance period [40 CFR 63.347(g) (4)].

- i. If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by Condition 7.1.5(b), the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Illinois EPA and/or USEPA [40 CFR 63.342(f)(3)(iv)].
  
- h. At least 30 calendar days before changing the method of compliance for an affected decorative chrome plating line, the Permittee shall certify to the Illinois EPA that the decorative chrome plating line will be in compliance with the applicable limitation of Condition 7.1.6 consistent with the requirements of the compliance certification reports of Condition 9.8.

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, the monitoring requirements in Condition 7.1.8 and the following:

- a. Compliance with Condition 7.1.3(b) and (c) is assumed to be achieved by proper operation of the fume suppressant with wetting agent, as addressed by the work practice standards in Conditions 7.1.5 and 7.1.6 and other provisions of the NESHAP regulations in Conditions 7.1.5 through 7.1.11.
  
- b. To determine compliance with Condition 5.5.1, chromium and PM emissions from the affected chrome plating lines shall be calculated based on the following:

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<u>Pollutant</u>	<u>Emission Factor</u> <u>(gr/dscf)</u>
Chromium	$1.2 \times 10^{-6}$
PM	$2.5 \times 10^{-6}$

These are the emission factors for decorative chromium electroplating with fume suppressant, Table 12.20-1, AP-42, Volume I, Fifth Edition, July 1996. Plating Emissions (lb) = (Air Flow, dscf) x (The Appropriate Emission Factor, gr/dscf) x (1 lb/7000 gr)

7.2 Units 08-09: Solvent Degreaser 1 and 2

7.2.1 Description

Solvent degreaser 1 and 2 are open top vapor degreasers used to remove oil and grease from metal and metal parts prior to further processing at the source. Trichloroethylene, which is classified as both Volatile Organic Material (VOM) and Hazardous Air Pollutant (HAP), is currently used as the cleaning solvent. Emissions of VOM and HAP are the result of solvent evaporation.

Solvent degreaser 1 and 2 were constructed or reconstructed in December 1997. Therefore, the compliance date for the NESHAP for Halogenated Solvent Cleaning [40 CFR 63 Subpart T] was immediately upon startup.

7.2.2 List of Emission Units and Pollution Control Method

Emission Unit	Description	Emission Control Method
08	Solvent Degreaser 1 (D-1)	Working-Mode Cover, Freeboard Refrigeration Device, and Superheated Vapor
09	Solvent Degreaser 2 (D-2)	Working-Mode Cover, Freeboard Refrigeration Device, and Superheated Vapor

7.2.3 Applicable Regulations

- a. The "affected solvent cleaning machines" for the purpose of these unit-specific conditions, are the solvent degreasers as specified in Condition 7.2.2.
- b. The affected solvent cleaning machines 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 solvent cleaning machines are subject to 35 IAC 218.183, Open Top Vapor Degreasing.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected solvent cleaning machines using trichloroethylene as a cleaning solvent are not subject to 35 IAC 218.301, unless an odor nuisance exists, because trichloroethylene is not considered a photochemically reactive material.

7.2.5 Operational and Work Practices and Control Requirements

- a. The Permittee shall ensure that each existing or new batch vapor solvent cleaning machine conforms to the following design requirements specified in paragraph (a) (1) through (a) (6) of this section [40 CFR 63.463 (a)]:
  - i. Each cleaning machine shall be designed or operated to meet the control equipment or technique requirements in paragraph (a) (i) (A) or (a) (i) (B) of this section [40 CFR 63.463(a) (1) (i) or (a) (1) (ii)].
    - A. An idling and downtime mode cover, as described in 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.
    - B. A reduced room draft as described in 40 CFR 63.463(e) (2) (ii).
  - ii. Each cleaning machine shall have a freeboard ratio of 0.75 or greater.
  - 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.
  - 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.
  - v. Each vapor cleaning machine shall be equipped with a vapor level control device that shuts

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off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

- vi. Each vapor cleaning machine shall have a primary condenser.
- b. The Permittee shall comply with the following control combination pursuant to 40 CFR 63.463(b)(2)(i):
  - i. A 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 as follows:
    - A. Employ control combinations (option 3) listed in table 2 of the 40 CFR 63.463 (b).  

Option 3: Working-Mode Cover, Freeboard Refrigeration Device, Superheated Vapor
- c. The Permittee shall meet all of the following required work and operational practices specified below [40 CFR 63.463 (d)(1) through (d)(12)].
  - i. Control air disturbances across the cleaning machine opening(s) by incorporating the control equipment or techniques as follows:
    - 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; or
    - B. A reduced room draft as described in 40 CFR 63.463(e)(2)(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.

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- 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).
- 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.
- v. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
- vi. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
- 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.
- 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.
- 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 satisfaction to achieve the same or better results as those recommended by the manufacturer.
- 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

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63, Subpart T, if requested during an inspection by the Illinois EPA.

- 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.
  - xii. Sponges, fabric, wood, and paper products shall not be cleaned.
- d. The Permittee shall comply with the following requirements [40 CFR 63.463 (e)].
- i. Conduct monitoring of each control device used to comply with 40 CFR 63.463.
  - ii. Determine during each monitoring period whether each control device used to comply with these standards meets the following requirements.
    - A. The Permittee shall comply with the following requirements for the working mode cover [40 CFR 63.463 (e) (2) (iii)]:
      - 1. Ensure that the cover opens only for part entrance and removal and completely covers the solvent cleaning machine openings when closed.
      - 2. Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
    - B. The Permittee shall comply with the following requirements for a freeboard refrigeration device [40 CFR 63.463 (e) (2) (i)]:
      - 1. The owner or operator shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.

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- C. The Permittee shall comply with the following requirements for superheated vapor [40 CFR 63.463(e) (2) (vi)]:
  - 1. Ensure that the temperature of the solvent vapor at the center of the superheated vapor is at least 10°F above the solvent's boiling point.
  - 2. Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system are followed.
  - 3. Ensure that parts remain within the superheated vapor for at least the minimum proper dwell time.
  
- 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;
  - ii. Solvent carryout emissions are minimized by:
    - A. Racking parts to allow complete drainage;
    - B. Moving parts in and out of the degreaser at less than 3.3 m/min (11 ft/min);
    - C. Holding the parts in the vapor zone until condensation ceases;
    - D. Tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and
    - E. Allowing parts to dry within the degreaser until visually dry.
  - iii. Porous or absorbent materials, such as cloth, leather, wood or rope are not degreased;
  - iv. Less than half of the degreaser's open top area is occupied with a workload;

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- 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;
  - vi. Spraying is done below the vapor level only;
  - vii. Solvent leaks are repaired immediately;
  - 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; and
  - ix. Water is not visually detectable in solvent exiting from the water separator; and 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.).
- f. Equipment Requirements B 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;
  - ii. 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; 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; and
    - C. One which shuts off the sump heat source when the vapor level exceeds the design level.

- iii. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- iv. 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; or
  - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA and further processed consistent with Section 218.108 of this Part. Such equipment or system may include a refrigerated chiller, an enclosed design or a carbon adsorption system.
- g. The Permittee shall use only trichloroethylene as solvent.

#### 7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source-wide emission limitations in Condition 5.5, the affected solvent cleaning machines are subject to the following:

- a. Emissions from the affected solvent cleaning machines shall not exceed the following limits:

VOM Emissions  
(Ton/Year)

45.9

This limit is based on the annual usage of cleaning solvents determined from receipts of cleaning solvent purchases and shipments of used solvent sent for reclamation during the same period, and excluding any solvent which is not a VOM, as defined by 35 IAC 211.7150.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1]

The above limitations were established in Construction Permit 97110054, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [T1]

#### 7.2.7 Testing Requirements

- a. 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 Condition 7.2.7(b).
- b. 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)].

#### 7.2.8 Monitoring Requirements

- a. The Permittee using a freeboard refrigeration device or superheated vapor system to comply with 40 CFR 63.463 shall conduct monitoring and record the results on a weekly basis for the control devices, as follows [40 CFR 63.466 (a)]:
  - i. For a freeboard refrigeration device, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the

center of the air blanket during the idling mode.

- ii. For a superheated vapor system, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the center of the superheated vapor zone while the solvent cleaning machine is in the idling mode.
- b. The Permittee complying with the equipment standards in 40 CFR 63.463(b) (2) using a working-mode cover shall conduct monitoring and record the results on a monthly basis as follows [40 CFR 63.466(b) (1)]:
- i. The owner or operator shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the solvent cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- c. The Permittee complying with the equipment standards in 40 CFR 63.463 shall monitor the hoist speed as described below [40 CFR 63.466(c)]:
- i. The Permittee 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).
  - 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.
  - 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.
  - iv. If an owner or operator can demonstrate to the Illinois EPA'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.

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 the affected solvent cleaning machines to demonstrate compliance with Conditions 5.5.1 and 7.2.3 through 7.2.8, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee complying with the provisions of 40 CFR 63.463 shall maintain records in written or electronic form as specified below for the lifetime of the each solvent cleaning machine [40 CFR 63.467 (a)]:
  - i. Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
  - 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.
  - iii. Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.
- b. The Permittee shall maintain records as specified below either in electronic or written form for a period of 5 years [40 CFR 63.467 (b)]:
  - i. The results of control device (working-mode cover, freeboard refrigeration device, and superheated vapor system) monitoring required under 40 CFR 63.466 (see also Condition 7.2.8).
  - ii. Information on the actions taken to comply with 40 CFR 63.463(e) (see also Condition 7.2.5(e)). 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. This information shall also include the following:

- A. Record of weekly freeboard air temperature measurements.
  - B. Record of weekly room condition and wind speed for reduced room draft.
  - C. Record of freeboard ratio and any modification of freeboard ratio.
- iii. Estimates of annual solvent consumption for each solvent cleaning machine.
- c. Monthly and annual VOM emissions from the affected solvent cleaning machines, with supporting calculations.

#### 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected solvent cleaning machines 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 Permittee complying with the provisions of 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 below [40 CFR 63.468 (f)]:
  - 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 40 CFR 63.463(d)(10)."
  - ii. An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

- b. If any of the requirements of 40 CFR 63.463(e) (2) are not met, the Permittee shall determine whether an exceedance has occurred using the following criteria [40 CFR 63.463 (e) (3)]:
  - i. An exceedance has occurred if the requirements of 40 CFR 63.463(e) (2) (iii) (A), (e) (2) (vi) (B), or (e) (2) (vi) (C) have not been met.
  - ii. An exceedance has occurred if the requirements of 40 CFR 63.463 (e) (2) (i), (e) (2) (iii) (B), or (e) (2) (vi) (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.
  - iii. The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468(h).
- c. The Permittee shall submit an exceedance report to the Illinois EPA except when, the Illinois EPA 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 Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under 40 CFR 63.468 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 following [40 CFR 63.468 (h)]:
  - i. Information on the actions taken to comply with 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.

- ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
  - 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.
- d. The Permittee shall report emissions of VOM in excess of the limits specified in Conditions 5.5.1 and 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

- a. For determination of compliance with the limits of this permit, solvent usage shall be determined by the following equation:

$$U = V - (W \times P)$$

Where:

U = Solvent usage for compliance determinations (gallons)

V = Virgin solvent<sup>a</sup> added to the degreasers (gallons), as determined by daily addition log sheets.

W = Waste solvent<sup>b</sup> removed from the degreasers and sent off-site for reclamation or disposal, as determined by monthly manifests.

P = Percent concentration of solvent in waste, as determined by analysis/testing<sup>c</sup>.

<sup>a</sup> For purposes of this permit, virgin solvent is defined as unused solvent.

<sup>b</sup> For purpose of this permit, waste solvent is defined as used solvent.

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- c. The percent concentration of solvent in waste (P) shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.
- b. Compliance with the organic material emission limits shall be calculated using the solvent density as specified in the Material Safety Data Sheet, and the solvent usage (U) per month, as follows:

$$\begin{array}{l} \text{Emission} = \text{Solvent usage (U) x Solvent density} \\ (\text{lb/month}) \quad (\text{gallon/month}) \quad \times (\text{lb/gallon}) \end{array}$$

## 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 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 \_\_\_\_\_ (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 Program

No permit revision shall be required for increases in emissions allowed under any approved economic incentive, marketable permits, emissions trading, or 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 process, emissions, or composition 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 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:

- 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:

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- 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  
  
Illinois Environmental Protection Agency  
Divisions of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506
  - iv. USEPA Region 5 - Air Branch  
  
United States EPA (AE - 17J)  
Air & Radiation Branch  
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 listed 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 Clean Air Act, 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 Clean Air Act; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

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 Clean Air Act 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 Environmental Protection 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)(0)(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) 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 certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. 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) (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 - Particulate Matter Emissions from Process Emission Units

- a. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the following equation.

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

Where:

P = Process Weight Rate

E = Allowable Emission Rate

1. 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

2. For process weight rates greater than or equal to 408 MG/hr (450 T/hr):

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

- b. Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14, 1972. [35 IAC 212.321]

Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lbs/hr
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

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Metric		English	
P	E	P	E
Mg/hr	kg/hr	Ton/hr	lbs/hr
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.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and

E = Allowable emission rate in kg/hr or lbs/hr.

10.3 Attachment 3 - 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.

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

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- 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

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	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.

<b>Summary Of Application Contents</b>	
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.

<b>Signature Block</b>	
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

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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.

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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

I. INTRODUCTION

This source has applied for a renewal Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Arlington Plating Company is located at 600 South Vermont Street in Palatine, Illinois. Arlington Plating Company conducts polishing, plating, and painting of miscellaneous metal parts.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Emission Control Equipment
05	Decorative Chrome Plating Tank (H2)	Surface Tension
06	Decorative Chrome Plating Tank-Hand Line (HL1-2)	Surface Tension
07	Decorative Chrome Plating Tank-Hand Line (HL2-2)	Surface Tension
08	Solvent Degreaser 1 (D-1)	Reduced Room Draft, Freeboard Refrigeration Device, and Freeboard Ratio of 1
09	Solvent Degreaser 2 (D-2)	Reduced Room Draft, Freeboard Refrigeration Device, and Freeboard Ratio of 1

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	68.08
Sulfur Dioxide (SO <sub>2</sub> )	0.04
Particulate Matter (PM)	1.70
Nitrogen Oxides (NO <sub>x</sub> )	7.20
HAP, not included in VOM or PM	-----
Total	77.02

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

Because this source is located in the Chicago ozone nonattainment area and emits volatile organic material, the permit includes conditions to implement the Emission Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce emissions from stationary sources to contribute to further reasonable progress toward attainment, as further described in section 6 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.