217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Ford Motor Company
Attn: Rob Harsh
12600 South Torrence Avenue
Chicago, Illinois 60633

Application No.: 96030048 I.D. No.: 031600AAR
Applicant's Designation: Date Received: March 6, 1996
Operation of: Motor Vehicle Assembly Plant
Date Issued: April 7, 2000 Expiration Date[2]: April 7, 2005
Source Location: 12600 South Torrence Ave., Chicago, Cook County, IL 60633
Responsible Official: Ron Reaves, Plant Manager

This permit is hereby granted to the above-designated Permittee to operate a motor vehicle assembly plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: August 8, 2000
Revision Date Issued: October 10, 2000
Purpose of Revision: Administrative Amendment

This administrative amendment incorporates changes in General Permit Conditions and Standard Permit Conditions. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued April 7, 2000 is incorporated herein by reference.

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

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

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

DES:JRC:psj

cc: Illinois EPA, FOS, Region 1
USEPA

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

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

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10.0 ATTACHMENTS

1.0 SOURCE IDENTIFICATION

1.1 Source

Ford Motor Company, Chicago Assembly Plant
12600 South Torrence Avenue
Chicago, Illinois 60633
773/646-7472

I.D. No.: 031600AAR
Standard Industrial Classification: 3711, Motor Vehicles and Car Bodies

1.2 Owner/Parent Company

Ford Motor Company
The American Road
Dearborn, Michigan 48121

1.3 Operator

Ford Motor Company, Chicago Assembly Plant
12600 South Torrence Avenue
Chicago, Illinois 60633

Rob Harsh, Plant Environmental Representative
773/646-7472

Ron Reaves, Plant Manager
773/646-7211

1.4 General Source Description

Ford Motor Company is located at 12600 South Torrence Ave. in Chicago. The source is a motor vehicle assembly plant. Emissions from the plant are primarily emitted from the various coating operations.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

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:

Waste Solvent Tanks
Waste Solvent Truck Loading
Purge Solvent Tanks
Pre-Cleaning Tanks
Windshield Fluid Tanks
Windshield Fluid Filling Operations
Radiator Coolant Tanks
Radiator Coolant Filling Operations
Welding Operations
Wash Solvent Tanks
Mig Braze Booth Air Supply
Strand Heaters
Space Heaters

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:

Vehicle Touch-Up
Grinding Area With Baghouse
Sulfuric Acid Storage Tank

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

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

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Coating operations (excluding powder, architectural and industrial maintenance coating) with aggregate VOM usage that never exceeds 15 lbs/day from all coating lines at the source, including VOM from coating, dilutents, and cleaning materials [35 IAC 201.210(a)(13)].

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

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

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

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

3.2 Compliance with Applicable Requirements

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

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

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

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

3.3 Addition of Insignificant Activities

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

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

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Phosphate Operation Hot Water Heaters	Phosphate Coating	July 1997	None
E-Coat Dip Tank System	Electrodeposition tank with 47 mmBtu/hr Natural Gas fired Curing Oven	June 1976	None
Prime Coat Operations	Coating Line with 15 mmBtu/hr Natural Gas fired Curing Oven with three 20 mmBtu/hr Natural Gas fired Air Make-up Units	April 1972	Wet Scrubber #1
Topcoat Coating Lines #1 and #2	Coating Lines with three 10 mmBtu/hr Natural Gas fired Curing Ovens with five 20 mmBtu/hr Natural Gas fired Air Make-up Units on each Coating Line (200 mmBtu/hr Total)	April 1972	Wet Scrubber #2 & #3 and a Single 16 mmBtu/hr Natural Gas fired Afterburner
Vehicle Striping Operations	Coating Line	April 1972	None
Final Repair Coating Line	Coating Line	April 1972	Wet Scrubber #4
Glass Installation I Process and Blackout Operation	Coating Line with an insignificant 6 mmBtu/hr Air Make-up Unit	February 1983	None
Tutone/Repair Coating Line	Coating Line with a 10 mmBtu/hr Natural Gas fired Curing Oven	April 1972	Wet Scrubber #5
E-Coat Dry Scuff Booth	Correction of surface imperfections from the E-Coat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #1

Emission Unit	Description	Date Constructed	Emission Control Equipment
Prime Coat Dry Scuff Booth	Correction of surface imperfections from the Prime Coat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #2
Topcoat Dry Scuff Booth	Correction of surface imperfections from the Topcoat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #3
Glass Installation II Process	Final Glass Installation	April 1972	None
Sealer & Adhesive Application Processes	Application of Sealers and Adhesives	April 1972	None
Solvent Use Areas	Various types of solvent are used for cleaning and purging	April 1972	None
Tank #1	12,000 gallon gasoline storage tank	June 1993	None
Tank #2	12,000 gallon gasoline storage tank	June 1993	None
Tank #3	12,000 gallon gasoline storage tank	June 1993	None
Boiler #1	60 mmBtu/hr Natural Gas & Propane Fired	April 1972	None
Boiler #2	60 mmBtu/hr Natural Gas & Propane Fired	April 1972	None
Boiler #3	40 mmBtu/hr Natural Gas & Propane Fired	April 1972	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM, NOx, PM, and HAPs emissions.

5.2 Applicable Regulations

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

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

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

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

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

ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust

suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

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

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

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

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

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

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 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.

5.2.7 PM_{10} Contingency Measure Plan

This stationary source, as defined in 35 IAC 212.700, is required to prepare and submit a contingency measure plan reflecting the PM_{10} emission reductions as set forth in 35 IAC 212.703. Such plan is incorporated by reference into this permit and shall be implemented in accordance with 35 IAC 212.704. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U, incorporated herein by reference.

5.3 Non-Applicability of Regulations of Concern

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)	3,137.9
Sulfur Dioxide (SO_2)	1.3
Particulate Matter (PM)	483.1
Nitrogen Oxides (NO_x)	333.7
HAP, not included in VOM or PM	---
TOTAL	3,956.0

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

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

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source 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 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.

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

ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;

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

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

v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).

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

6.4 Market Transactions

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

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

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

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

6.5 Emissions Excursion Compensation

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

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

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

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

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

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

6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

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

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

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

6.7 Annual Account Reporting

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

i. Actual seasonal emissions of VOM from the source;

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

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the

associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source’s baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

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

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

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 5,280 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 599.8761 tons.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 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 emissions excursion compensation, in accordance with 35 IAC 205.720; and

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

6.9 Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emissions Report;

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

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

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

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

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

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

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

None

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

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Phosphate Operation Hot Water Heaters

7.1.1 Description

Two 15 mmBtu/hr heaters used to heat the operation. The heaters are fired by natural gas.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Heaters	2 - 15.0 mmBtu natural gas fired heaters	1997	None

7.1.3 Applicability Provisions and Applicable Regulations

a. An “affected heater” for the purpose of these unit-specific conditions, is a fuel combustion emission unit as described in Conditions 7.1.1 and 7.1.2.

b. The affected heaters are subject to the NSPS for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because the construction, modification, or reconstruction is commenced after June 9, 1989 and has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.

c. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 10 mmBtu/hr to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

d. Each affected heater is subject to the emission limits identified in Condition 5.2.2.

7.1.4 Non-Applicability of Regulations of Concern

a. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 218.303].

b. The control requirements of 35 IAC 218 Subpart TT shall not apply to fuel combustion units [35 IAC 218.980(f)].

7.1.5 Operational and Production Limits and Work Practices

a. Natural gas shall be the only fuel fired in the affected heaters.

7.1.6 Emission Limitations

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

a. Emissions from the affected heaters shall not exceed the following limits when natural gas is being used to fire the affected heaters:

PM		SO_2		VOM	
(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
0.1	1.0	0.1	0.1	0.1	0.7

CO		NO_x	
(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
0.9	11.0	1.1	13.1

These limits are based on maximum firing rates, maximum hours of operation, and emission factors and formulas in Condition 7.1.12(b).

The above limitations contain revisions to previously issued Permit 97070007. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the

information in the CAAPP application contains the most current and accurate information for the source. Specifically, the emissions have changed based on the AP-42 emission factors have change since Permit 97070007 was issued. Maximum firing rates and maximum hours of operation has not changed. [T1R].

b. 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).

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

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

a. Natural gas fuel usage for the affected heaters, scf/mo and scf/yr.

b. Emissions of all pollutants from the affected heaters, ton/mo and ton/yr.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected heater 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:

None

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

a. Compliance with Condition 7.1.3 (c) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected heaters.

b. Compliance with the emission limits in Conditions 5.5 and the limits in Condition 7.1.6 are determined by the following emission factors and emission formulas listed below:

i. Emission factors for the affected heaters when fired by natural gas:

Pollutant	Emission Factor (lb/mmscf)
PM	7.6
SO_2	0.6
VOM	5.5
CO	84.0
NO_x	100.0

These are emission factors determined for the affected heaters using standard AP-42 emission factors for natural gas.

ii. Emission formula for the affected heaters when fired by natural gas:

Appropriate Emissions (ton) = Natural Gas Consumed (mmscf) * The Appropriate Emission Factor (lb/mmscf) ÷ 2,000 lb/ton

7.2 Unit Coating Lines - E-Coat Dip Tank System, Prime Coat Operations, Topcoat Coating Lines #1 and #2, Vehicle Striping Operations, Final Repair Coating Line, and Glass Installation I Process

7.2.1 Description

The coating lines consist of an e-coat dip tank system, prime coat operations, topcoat coating lines #1 and #2, vehicle striping operations, a final repair coating line, and a glass installation I process. All coating lines utilize mixtures of resins, pigments, and other additives to coat vehicles. The e-coat dip tank system, prime coat operations, and topcoat coating lines #1 and #2 utilize curing ovens to dry the coating.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
E-Coat Dip Tank System	Electrodeposition tank with 47 mmBtu/hr Natural Gas fired Curing Oven	June 1976	None
Prime Coat Operations	Coating Line with 15 mmBtu/hr Natural Gas fired Curing Oven with three 20 mmBtu/hr Natural Gas fired air make-up units	April 1972	Wet Scrubber #1
Topcoat Coating Lines #1 and #2	Coating Lines with three 10 mmBtu/hr Natural Gas fired Curing Ovens with five 20 mmBtu/hr Natural Gas fired Air Make-up Units on each Coating Line (200 mmBtu/hr Total)	April 1972	Wet Scrubber #2 & #3 and a Single 16 mmBtu/hr Natural Gas fired Afterburner
Vehicle Striping Operations	Coating Line	April 1972	None
Final Repair Coating Line	Coating Line	April 1972	Wet Scrubber #4
Glass Installation I Process and Blackout Operation	Coating Line with an insignificant 6 mmBtu/hr Air Make-up Unit	February 1983	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
Tutone/Repair Coating Line	Coating Line with a 10 mmBtu/hr Natural Gas fired Curing Oven	April 1972	Wet Scrubber #5

7.2.3 Applicability Provisions and Applicable Regulations

a. An “affected coating line” for the purpose of these unit-specific conditions, is each coating line described in Conditions 7.2.1 and 7.2.2.

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

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

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

d. Except as otherwise provided in Condition 7.2.4(b) (see also 35 IAC 212.324(d)), no person shall cause or allow the emission into the atmosphere, of PM_{10}, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period [35 IAC 212.324(b)].

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

water" part of the coating composition. The emission limitations are as follows:

i. Automobile or Light Duty Truck Coating/Prime Coat [35 IAC 218.204(a)(1)]:

kg/l	lb/gal
0.14	1.2

ii. Automobile or Light Duty Truck Coating/Primer Surfacer Coat [35 IAC 218.204(a)(2)]:

kg/l (*1)	lb/gal (*1)
1.81	15.1

(*1) - of coating solids deposited

iii. Automobile or Light Duty Truck Coating/Topcoat [35 IAC 218.204(a)(3)]:

kg/l (*1)	lb/gal (*1)
1.81	15.1

(*1) - of coating solids deposited

iv. Final Repair Coat [35 IAC 218.204(a)(4)]:

kg/l	lb/gal
0.58	4.8

f. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected coating lines not being subject to the New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60 Subparts A and MM, because the affected coating lines are not considered to be a prime coat, guide coat, or topcoat operation or the affected coating lines where constructed, modified, or reconstructed before October 5, 1979, pursuant to 40 CFR 60.390(a) and (c).

b. The mass emission limits contained in Condition 7.2.3(d) (see also 35 IAC 212.324(b)) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a

stack test is performed, this regulation is not a defense finding of a violation of the mass emission limits contained in Condition 7.2.3(d) [35 IAC 212.324(d)].

c. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.2.5 Operational and Production Limits and Work Practices

None

7.2.6 Emission Limitations

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

7.2.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

a. On at least an annual basis:

i. The VOM content of representative coatings "as applied" on the affected coating lines shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) or other approved reference test method. Compliance with this Condition may utilize other approved methodology allowed under USEPA’s Automobile and Light Duty Truck Protocol.

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.2.9 directly reflect the application of such material and separately account for any additions of solvent.

iii. Upon written request from the Permittee, the Illinois EPA may waive this requirement on a

year-by-year basis, if prior testing shows a margin of compliance and no significant changes in coating supplies have occurred.

b. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected coating lines shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) [35 IAC 218.105(a) and 218.211(a)].

7.2.8 Monitoring Requirement

None

7.2.9 Recordkeeping Requirements

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

a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.2.7, which include the following [Section 39.5(7)(e) of the Act]:

i. Identification of material tested;

ii. Results of analysis;

iii. Documentation of analysis methodology; and

iv. Person performing analysis.

b. Pursuant to 35 IAC 218.211(c), for affected coating lines not subject to 35 IAC 218.204(a)(2) or (a)(3), the Permittee shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating as applied on each coating line [35 IAC 218.211 (c)(2)(A)].

ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of

VOM) as applied each day on each coating line [35 IAC 218.211(c)(2)(B)].

c. Pursuant to 35 IAC 218.211(f), for affected coating lines subject to 35 IAC 218.204(a)(2) or (a)(3), the Permittee shall comply with the following:

i. The Permittee shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of at least the retention requirements in Condition 5.6.3(a):

A. All information necessary to calculate the daily-weighted average VOM emissions from the coating operations in kg (lbs) per 1 (gal) of coating solids deposited including [35 IAC 218.211(f)(2)(A)]:

1. The name and identification number of each coating as applied on each coating operation [35 IAC 218.211(f)(2)(A)(i)].

2. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating operation [35 IAC 218.211(f)(2)(A)(ii)].

B. If a control device(s) is used to control VOM emissions, control device monitoring data; a log of operating time for the capture system, control device, monitoring equipment and the associated coating operation; and a maintenance log for the capture system, control device and monitoring equipment, detailing all routine and non-routine maintenance performed including dates and duration of any outages [35 IAC 218.211(f)(2)(B)].

ii. The Permittee shall determine and record the daily VOM emissions in kg (lbs) per 1 (gal) of coating solids deposited within 10 days from the end of the month and maintain this information at the source for a period of three years.

d. Records addressing use of good operating practices for the control equipment.

e. Records of the coating usage for each affected coating line (gal/day, gal/mo, and gal/yr).

f. The VOM content of each coating (% by Wt).

g. Density of each coating (lb/gal).

h. Records of the solvent usage for each affected coating line (gal/day, gal/mo, and gal/yr).

i. Density of solvent (lb/gal)

j. The aggregate monthly and annual VOM emissions from the affected coating lines based on the material usage, with supporting calculations.

7.2.10 Reporting Requirements

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

a. Pursuant to 35 IAC 218.211(c)(3)(A), for affected coating lines not subject to 35 IAC 218.204(a)(2) or (a)(3), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.2.3(e) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.

b. Pursuant to 35 IAC 218.211(f)(4)(A), for affected coating lines subject to 35 IAC 218.204(a)(2) or (a)(3), the Permittee shall notify the Illinois EPA in the following instances:

i. Any record showing a violation of 35 IAC 218.204(a)(2) or (a)(3) shall be reported by sending a copy of such record to the Illinois EPA within 15 days from the end of the month in which the violation occurred.

ii. The owner or operator shall notify the Illinois EPA of any change to the operation at least 30 days before the change is effected. The Illinois EPA shall determine whether or not compliance testing is required. If the

Illinois EPA determines that compliance testing is required, then the owner or operator shall submit a testing proposal to the Illinois EPA within 30 days and test within 30 days of the approval of the proposal by the Illinois EPA and USEPA.

c. Continued operation of any affected coating line with a defect in the control equipment that may result in emissions of particulate matter in excess of limits in Condition 7.2.3(c) within 30 days of such an occurrence.

d. Emissions of VOM in excess of limits in Condition 7.2.3 within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

a. Compliance provisions addressing Condition 7.2.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected coating lines as required in Condition 7.2.5(a) and by the recordkeeping requirements of 7.2.9.

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

c. To determine compliance with Condition 5.5.1, PM and VOM emissions from the affected coating lines shall be calculated based on the following:

i. Particulate Matter Emissions:

PM (ton/yr) = (Booth grain loading) * (booth exhaust airflow) * (hours of operation) * (fraction paint applicator on time)

ii Volatile Organic Material Emissions:

$$\text{VOM (ton/yr)} = \sum_{i=1}^{n} [\ \text{Coating Usage (gal/yr)} \times \text{Coating Density (lb/gal)} \times \text{VOM Content of Coating (\% by Wt.)} \div 2{,}000\ ]$$

where:

n = The number of different coatings applied

7.3 Unit E-Coat, Prime Coat, and Topcoat Dry Scuff Booths Control Dry Fabric Filters #1, #2, and #3

7.3.1 Description

The scuff booths are enclosed sanding booths to correct minor surface imperfections and to prepare the metal surfaces for the next coating application. Air is exhausted from the booths through dry fabric filters for particulate matter control.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
E-Coat Dry Scuff Booth	Correction of surface imperfections from the E-Coat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #1
Prime Coat Dry Scuff Booth	Correction of surface imperfections from the Prime Coat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #2
Topcoat Dry Scuff Booth	Correction of surface imperfections from the Topcoat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #3

7.3.3 Applicability Provisions and Applicable Regulations

a. An “affected scuff booth” for the purpose of these unit-specific conditions, is each scuff booth described in Conditions 7.3.1 and 7.3.2.

b. Each affected scuff booth is subject to the emission limits identified in Condition 5.2.2.

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

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit,

either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

d. Except as otherwise provided in Condition 7.3.4(b) (see also 35 IAC 212.324(d)), no person shall cause or allow the emission into the atmosphere, of PM_{10}, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period [35 IAC 212.324(b)].

7.3.4 Non-Applicability of Regulations of Concern

N/A

7.3.5 Operational and Production Limits and Work Practices

a. The Permittee shall follow good operating practices for the fabric filters, including periodic inspection, routine maintenance, and prompt repair of defects.

7.3.6 Emission Limitations

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

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirement

None

7.3.9 Recordkeeping Requirements

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

a. Records addressing use of good operating practices for the control equipment.

b. Vehicles produced per year.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected scuff booth 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. Emissions of PM from an affected scuff booth in excess of the limits specified in Condition 7.3.3 within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

a. Compliance provisions addressing Condition 7.3.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected scuff booths as required in Condition 7.3.5(a) and by the recordkeeping requirements of 7.3.9.

b. Compliance with the emission limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.3.9 and formula listed below:

PM emissions (ton/yr) = vehicles produced * lb PM emitted (after controls)/vehicle produced

7.4 Unit Glass Installation II Process

7.4.1 Description

The glass installation II process is where the final glass is inserted. This process is a four-step process that is conducted with robotic arms in an unenclosed area. The four-step process is: 1) cleaning the glass perimeter with a solvent, 2) applying blackout primer to the perimeter, 3) applying urethane to the glass perimeter, and 4) inserting front and rear stationary glass.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Glass Installation II Process	Final Glass Installation	April 1972	None

7.4.3 Applicability Provisions and Applicable Regulations

a. The “affected glass installation II process” for the purpose of these unit-specific conditions, is the process described in Conditions 7.4.1 and 7.4.2.

b. The affected glass installation II process is subject to the emission limits identified in Condition 5.2.2.

c. The affected glass installation II process is subject to 35 IAC 212.321(a), which provides that:

   No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

d. Except as otherwise provided in Condition 7.4.4(b) (see also 35 IAC 212.324(d)), no person shall cause or allow the emission into the atmosphere, of PM_{10}, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period [35 IAC 212.324(b)].

e. The affected glass installation II process is subject to 35 IAC 218.926(b) of 35 IAC 218 Subpart PP, which provides that the daily-weighted average VOM content shall not exceed 0.42 kg VOM/l (3.5 lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied during any day.

7.4.4 Non-Applicability of Regulations of Concern

a. Owners and operators complying with 35 IAC 218.926(b) are not required to comply with 35 IAC 218.301 [35 IAC 218.926(b)].

b. The mass emission limits contained in Condition 7.4.3(d) (see also 35 IAC 212.324(b)) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this regulation is not a defense finding of a violation of the mass emission limits contained in Condition 7.4.3(d) [35 IAC 212.324(d)].

c. No limits under 35 IAC 218 Subpart PP shall apply to emission units with emissions of VOM to the atmosphere less that or equal to 0.91 Mg (1.0 ton) per calendar year if the total emissions from such emission units not complying with 35 IAC 218.926 does not exceed 4.5 Mg (5 tons) per calendar year, provided that this provision shall not apply to an emission unit which is a leather coating line or operation at a source where the criteria of 35 IAC 218.920(a) are not met.

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 Emission Limitations

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

7.4.7 Testing Requirements

a. When in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with 35 IAC 218.926, the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart PP shall, at his own expense,

conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.928(a)].

b. Nothing in 35 IAC 218 shall limit the authority of the USEPA pursuant to the Clean Air Act, as amended, to require testing [35 IAC 218.928(b)].

7.4.8 Monitoring Requirement

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected glass installation II process to demonstrate compliance with Conditions 5.5.1 and 7.4.3, pursuant to Section 39.5(7)(b) of the Act:

a. Any owner or operator of a coating line which is subject to the requirements of 35 IAC 218 Subpart PP and complying by means of the daily-weighted average VOM content limitation shall comply with the following [35 IAC 218.991(b):

On and after a date consistent with 35 IAC 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of at least the retention requirements in Condition 5.6.3(a) [35 IAC 218.991(b)(2)]:

i. The name and identification number of each coating as applied on each coating line [35 IAC 218.991(b)(2)(A)];

ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line [35 IAC 218.991(b)(2)(B)]; and

iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in Section 218.104 of this Part [35 IAC 218.991(b)(2)(C)].

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected glass installation II process 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. Any owner or operator of a coating line which is subject to the requirements of 35 IAC 218 Subpart PP and complying by means of the daily-weighted average VOM content limitation shall comply with the following:

i. Any record showing a violation of 35 IAC 218 Subpart PP shall be reported by sending a copy of such record to the Illinois EPA within 15 days from the end of the month in which the violation occurred.

ii. On and after a date consistent with 35 IAC 218.106, the owner or operator of a subject coating line shall notify the Agency [35 IAC 218.991(b)(3)]:

At least 30 calendar days before changing the method of compliance with 35 IAC 218 Subpart PP from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 IAC 218.991(a)(1). Upon changing the method of compliance with 35 IAC 218 Subpart PP from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 IAC 218.991(a) [35 IAC 218.991(b)(3)(B)].

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

a. Compliance with the limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.4.9 and the formula listed below:

$$\text{VOM (ton/yr)} = \sum_{i=1}^{n} [\ \text{Coating Usage (gal/yr)} \times \text{Coating Density (lb/gal)} \times \text{VOM Content of Coating (\% by Wt.)} \div 2{,}000\ ]$$

where:

n = The number of different coatings applied

b. Compliance provisions addressing Conditions 7.4.3(c) (d) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance inherent in operation of the affected glass installation II process.

c. Compliance with limits in Condition 7.4.3(e) for the affected glass installation II process shall be based on the recordkeeping requirements in Condition 7.4.9 and by the following equation, as defined in 35 IAC 211.1670:

$$VOM_W = [\ \sum_{i=1}^{n} V_i\ C_i] \ /\ V_T$$

where:

VOM_W = The average VOM content of two or more coatings as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM);

n = The number of different coatings as applied each day on a coating line;

V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal);

C_i = The VOM content of each coating as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM); and

V_T = The total volume of all coatings (minus water and any compounds which are specifically

exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

As a note, Vi and V_T are calculated values in the system in use at the plant.

7.5 Unit Sealer & Adhesive Application Processes

7.5.1 Description

The sealer & adhesive application processes are various operations where sealers & adhesives are applied in unenclosed areas throughout the plant. Sealers are applied to the metal chassis and joints to protect the vehicle interior compartments from water, dirt, and noise penetration. Adhesives are used during the assembly process for the application of vehicle parts.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Sealer & Adhesive Application Processes	Application of Sealers and Adhesives	April 1972	None

7.5.3 Applicability Provisions and Applicable Regulations

a. The “affected sealer & adhesive application processes” for the purpose of these unit-specific conditions, are the processes described in Conditions 7.5.1 and 7.5.2.

b. The affected sealer & adhesive application processes are subject to the emission limits identified in Condition 5.2.2.

c. The affected sealer & adhesive application processes are subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

d. Except as otherwise provided in Condition 7.5.4(b) (see also 35 IAC 212.324(d)), no person shall cause or allow the emission into the atmosphere, of PM_{10},

from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period [35 IAC 212.324(b)].

e. The affected sealer & adhesive application processes are subject to 35 IAC 218.986(b) of 35 IAC 218 Subpart TT, which provides that the daily-weighted average VOM content shall not exceed 0.42 kg VOM/l (3.5 lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied during any day.

7.5.4 Non-Applicability of Regulations of Concern

a. Owners and operators complying with 35 IAC 218.986(b) are not required to comply with 35 IAC 218.301 [35 IAC 218.986(b)].

b. The mass emission limits contained in Condition 7.5.3(d) (see also 35 IAC 212.324(b)) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this regulation is not a defense finding of a violation of the mass emission limits contained in Condition 7.5.3(d) [35 IAC 212.324(d)].

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

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

7.5.7 Testing Requirements

a. When in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with 35 IAC 218.986, the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.988(a)].

b. Nothing in 35 IAC 218 shall limit the authority of the USEPA pursuant to the Clean Air Act, as amended, to require testing [35 IAC 218.988(b)].

7.5.8 Monitoring Requirement

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected sealer & adhesive application processes to demonstrate compliance with Conditions 5.5.1 and 7.5.3, pursuant to Section 39.5(7)(b) of the Act:

a. Any owner or operator of a coating line which is subject to the requirements of 35 IAC 218 Subpart TT and complying by means of the daily-weighted average VOM content limitation shall comply with the following [35 IAC 218.991(b):

On and after a date consistent with 35 IAC 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of at least the retention requirements in Condition 5.6.3(a) [35 IAC 218.991(b)(2)]:

i. The name and identification number of each coating as applied on each coating line [35 IAC 218.991(b)(2)(A)];

ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line [35 IAC 218.991(b)(2)(B)]; and

iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in Section 218.104 of this Part [35 IAC 218.991(b)(2)(C)].

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected sealer & adhesive application processes 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. Any owner or operator of a coating line which is subject to the requirements of 35 IAC 218 Subpart TT and complying by means of the daily-weighted average VOM content limitation shall comply with the following:

i. Any record showing a violation of 35 IAC 218 Subpart TT shall be reported by sending a copy of such record to the Illinois EPA within 15 days from the end of the month in which the violation occurred.

ii. On and after a date consistent with 35 IAC 218.106, the owner or operator of a subject coating line shall notify the Agency [35 IAC 218.991(b)(3)]:

At least 30 calendar days before changing the method of compliance with 35 IAC 218 Subpart TT from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 IAC 218.991(a)(1). Upon changing the method of compliance with 35 IAC 218 Subpart TT from the use of complying coatings to the use capture systems and control devices, the owner or operator shall comply with all requirements of 35 IAC 218.991(a) [35 IAC 218.991(b)(3)(B)].

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

a. Compliance with the limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.5.9 and the formula listed below:

$$\text{VOM (ton/yr)} = \sum_{i=1}^{n} [\ \text{Coating Usage (gal/yr)} \times \text{Coating Density (lb/gal)} \times \text{VOM Content of Coating (\% by Wt.)} \div 2{,}000\ ]$$

where:

n = The number of different coatings applied

b. Compliance provisions addressing Condition 7.5.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance inherent in operation of the affected sealer & adhesive application processes.

c. Compliance with limits in Condition 7.5.3(e) for the affected sealer & adhesive application processes shall be based on the recordkeeping requirements in Condition 7.5.9 and by the following equation, as defined in 35 IAC 211.1670:

$$VOM_W = [\sum_{i=1}^{n} V_i C_i] / V_T$$

where:

VOM_W = The average VOM content of two or more coatings as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM);

n = The number of different coatings as applied each day on a coating line;

V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal);

C_i = The VOM content of each coating as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM); and

V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

As a note, Vi and V_T are calculated values in the system in use at the plant.

7.6 Solvent Use Areas

7.6.1 Description

Solvent is used as a cleaning material in various areas of the paint shop of the facility. Uses include, but are not limited to, vehicle body wipe cleaning, paint booth wall and component cleaning, and paint application equipment cleaning. Solvent usages for these unit specific conditions does not include those solvents utilized for janitorial purposes or for maintenance activities unrelated to production equipment.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Solvent Use Areas	Various types of solvent are used for cleaning and purging	April 1972	None

7.6.3 Applicability Provisions and Applicable Regulations

a. An “affected solvent use area” for the purpose of these unit-specific conditions, are the activities described in Conditions 7.6.1 and 7.6.2.

b. Emission capture and control equipment which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit [35 IAC 218.986(a)].

c. Each affected solvent use area is subject to the emission limits identified in Condition 5.2.2.

7.6.4 Non-Applicability of Regulations of Concern

None

7.6.5 Operational and Production Limits and Work Practices

a. The Permittee shall not apply via spray equipment any cleaning solvent in excess of 3.5 pounds VOM per gallon for cleaning paint booth walls, grates, or the exteriors of paint application equipment.

b. The Permittee shall not utilize VOM-containing materials to remove paint from paint booth grates. This restriction does not prevent the Permittee from

utilizing VOM-containing grate coatings which reduce adhesion of uncured paint to grate surfaces.

c. The Permittee shall not store at its Plant waste solvents from VOM-containing cleaning materials and soiled rags from cleaning operations in open containers when the materials are not in use except as necessary to prevent a fire hazard.

7.6.6 Emission Limitations

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

a. Emissions of VOM from the affected solvent use areas shall not exceed 390 ton per year. This limitation is being established in this permit in conjunction with the compliance schedule, see Condition 7.6.13.

b. 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).

7.6.7 Testing Requirements

a. Upon reasonable request by the Illinois EPA, the VOM content of specific cleaning solvents used on the affected solvent use areas shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) or other approved reference test method [35 IAC 218.105(a) and 218.211(a)].

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the cleaning materials used in the affected solvent use areas to demonstrate compliance with Conditions 5.5.1 and 7.6.6, pursuant to Section 39.5(7)(b) of the Act:

a. The name and identification of each VOM-containing material.

b. A listing of the operations in which VOM-containing material were used.

c. The VOM content in pounds of VOM per gallon calculated using Method 24 in Appendix A of 40 CFR Part 60.

d. The total gallons of each VOM-containing material utilized for cleaning operations.

e. The total gallons of solvent recovered for disposal.

f. The monthly calculated usage of VOM from each cleaning material used in each various cleaning area.

g. The total monthly calculated emissions of VOM in tons per month.

h. The total rolling annual twelve (12) month VOM emissions in tons per year.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected solvent use areas with the permit requirements as follows, pursuant to reporting requirements contained within paragraphs 18, 19, and 20 in the consent decree. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. VOM emissions that exceed the limits in Condition 7.6.6 and any other noncompliance with the permit requirements of this Section 7.6 within 15 days of finding the exceedance.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.6.12 Compliance Procedures

a. Compliance with Condition 7.6.3(b) is addressed in Condition 7.6.13.

b. To determine compliance with Condition 5.5.1 and 7.6.6, VOM emissions from the affected solvent use areas shall be calculated based on the following procedure:

i. Gallons per month of each solvent/cleaner used (includes those for solvents used as paint diluents and cleaners) in paint area multiplied by the VOM content of each solvent/cleaner derives the Total pounds VOM per month for each solvent/cleaner,

ii. Sum the pounds VOM utilized for all solvents/cleaners,

iii. Gallons per month of each paint diluent used (tracked in Condition 7.2.9) multiplied by the VOM content of each diluent derives the Total pounds VOM per month for each diluent,

iv. Sum the pounds VOM utilized as paint diluents,

v. Subtract "iv" from "ii" to get total pounds VOM utilized that month from cleaning operations,

vi. For each shipment of waste solvent, multiply the gallons of waste solvent recovered by the VOM content of the waste solvent recovered to calculate the pounds VOM recovered from that shipment,

vii. Sum VOM recovered for each shipment in that month,

viii. Subtract "vii" from "v" to get total VOM emitted that month in pounds,

ix. Divide by 2000 to convert to tons, and

x. Sum "ix" for present month with previous 11 months' "ix" to calculate running 12 month total to demonstrate compliance with Condition 7.6.6(a).

xi. Utilize the December "x" for the purposes of calculating fees pursuant to Condition 5.5.1.

7.6.13 Compliance Schedules

a. The issuance of this permit does not shield the Permittee from compliance with the requirements of 35 IAC 218.986(a), see Condition 7.6.3(b), or from any future measures or requirements established as a result of the resolution of the noncompliance. In addition, this permit does not serve as proof of

compliance for the emission units or activities addressed in the pending adjusted standard action. After issuance or rejection of the adjusted standard, see Condition 7.6.13, the Permittee shall subsequently apply for revision of this permit to address the resolution of any such outstanding issue (e.g., include a new compliance schedule, identify appropriate applicable requirements, and/or establish new requirements).

b. The affected solvent use areas shall comply with the following schedule of compliance to address compliance with the requirements of 35 IAC 218.986(a), see Condition 7.6.3(b):

i. The adjusted standard is approved:

Milestone	Timing
The Permittee shall achieve full compliance with all requirements of the final adjusted standard regarding 35 IAC 218.986(a)	No later than any schedule established pursuant to the adjusted standard regarding 35 IAC 218.986(a)

ii. The adjusted standard is rejected:

Milestone	Timing
The Permittee shall submit a revised compliance plan to achieve full compliance with all requirements of 35 IAC 218.986(a)	No later than 30 days after rejection of the adjusted standard regarding 35 IAC 218.986(a)

c. Submittal of Progress Reports

A Progress Report shall be submitted every six months, beginning six months from the date of issuance of this permit. The Progress Report shall contain at least the following:

i. The required timeframe for achieving the milestones in the schedules for compliance, and actual dates when such milestones were achieved.

ii. An explanation of why any required timeframe in the schedules of compliance were not met, and any preventive or corrective measures adopted.

7.7 Unit Gasoline Storage Tanks #1, #2, #3 with Indoor Vehicle Filling Operations

7.7.7 Description

The gasoline storage tanks are above ground storage tanks used to store bulk quantities of unleaded gasoline. The gasoline is pumped to indoor vehicle filling operations area to partially fill vehicles.

7.7.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Tank #1	12,000 gallon gasoline storage tank	June 1993	None
Tank #2	12,000 gallon gasoline storage tank	June 1993	None
Tank #3	12,000 gallon gasoline storage tank	June 1993	None

7.7.3 Applicability Provisions and Applicable Regulations

a. The “affected tanks” for the purpose of these unit-specific conditions, are the tanks describe in Conditions 7.7.7 and 7.7.2.

b. The affected tanks are subject to the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60 Subpart Kb, because the affected tanks has a capacity greater than or equal to 40 m^3 and is used to store VOL's for which construction, reconstruction, or modification is commenced after July 23, 1984.

c. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108 [35 IAC 218.122(b)].

d. The affected tanks are subject to 35 IAC 218.583(a), which provides no person shall cause or allow the transfer of gasoline from any delivery vessel into

any stationary storage tank at a gasoline dispensing operation unless:

i. The tank is equipped with a submerged loading pipe [35 IAC 218.583(a)(1)]; and

ii. The vapors displaced from the storage tank during filling are processed by a vapor control system that includes one or more of the following:

A. A vapor collection system that meets the requirements of Condition 7.7.5(c) (see also 35 IAC 218.583(d)(4)) [35 IAC 218.583(a)(2)(A)]; or

B. A refrigeration-condensation system or any other system approved by the Illinois EPA and approved by the USEPA as a SIP revision, that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled [35 IAC 218.583(a)(2)(B)]; and

C. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 218.584(b) or (d) [35 IAC 218.583(a)(2)(C)]; and

iii. All tank vent pipes are equipped with pressure/vacuum relief valves with the pressure/vacuum relief valve shall be set to resist a pressure of at least 3.5 inches water column and to resist a vacuum of no less than 6.0 inches water column [35 IAC 218.583(a)(3)].

e. The affected tanks are subject to 35 IAC 218.585, which provides that:

i. No person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline whose Reid vapor pressure exceeds the applicable limitations set forth in Conditions 7.7.3(e)(ii) and (e)(iii) (see also 35 IAC 218.585(b) and (c)) during the regulatory control periods, which shall be May 1 to September 15 for retail outlets, wholesale purchaser-consumer, operations, and all other operations [35 IAC 218.585(a)].

ii. The Reid vapor pressure of gasoline, a measure of its volatility, shall not exceed 9.0 psi (62.07 kPa) during the regulatory control period in 1990 and each year thereafter [35 IAC 218.585(b)].

iii. The Reid vapor pressure of ethanol blend gasolines shall not exceed the limitations for gasoline set forth in Condition 7.7.3(e)(ii) (see also 35 IAC 218.585(b)) by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol blend gasolines whose Reid vapor pressure is less than 1.0 psi above the base stock gasoline immediately after blending with ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline [35 IAC 218.585(c)].

f. The affected tanks are subject to 35 IAC 218.586(c), which provides no owner or operator of a gasoline dispensing operation shall cause or allow the dispensing of motor vehicle fuel at any time from a motor fuel dispenser unless the dispenser is equipped with and utilizes a vapor collection and control system which is properly installed and operated as provided below:

i. Any vapor collection and control system installed, used or maintained has been CARB certified [35 IAC 218.586(c)(1)].

ii. Any vapor collection and control system utilized is maintained in accordance with the manufacturer's specifications and the certification [35 IAC 218.586(c)(2)].

iii. No elements or components of a vapor collection and control system are modified, removed, replaced or otherwise rendered inoperative in a manner which prevents the system from performing in accordance with its certification and design specifications [35 IAC 218.586(c)(3)].

iv. A vapor collection and control system has no defective, malfunctioning or missing components [35 IAC 218.586(c)(4)].

v. Operators and employees of the gasoline dispensing operation are trained and instructed in the proper operation and maintenance of a vapor collection and control system [35 IAC 218.586(c)(5)].

vi. Instructions are posted in a conspicuous and visible place within the motor fuel dispensing area and describe the proper method of dispensing motor vehicle fuel with the use of the vapor collection and control system [35 IAC 218.586(c)(6)].

g. Any gasoline dispensing operation that becomes subject to the provisions of 35 IAC 218.586(c) (see Condition 7.7.3(f)) at any time shall remain subject to the provisions of 35 IAC 218.586(c) at all times.

7.7.4 Non-Applicability of Regulations of Concern

a. Except as provided in Condition 7.7.9(b) (see also 40 CFR 60.116b) storage vessels with design capacity less than 75 m^3 are exempt from the General Provisions of the NSPS and from the provisions of 40 CFR 60 Subpart Kb [40 CFR 60.110b(b)].

b. The affected tanks are not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, pursuant to 35 IAC 218.119, because the affected tanks are used to store a petroleum liquid and the capacity is less than 151 m^3 (40,000 gal).

c. The affected tanks are not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, pursuant to 35 IAC 218.123(a)(2), which exempts storage tanks with a capacity less than 151.42 m^3 (40,000 gal).

d. Any gasoline dispensing operation subject to 35 IAC 218.586(c) (see Condition 7.7.3(f)) shall be exempt from the permit requirements specified under 35 IAC 201.142, 201.143 and 201.144 for its vapor collection and control systems, provided that Condition 7.3.10(d) is meet.

7.7.5 Operational and Production Limits and Work Practices

a. The affected tanks shall only be used for the storage of gasoline.

b. Pursuant to 35 IAC 218.583(c), each owner of a gasoline dispensing operation shall:

i. Install all control systems and make all process modifications required by Condition 7.7.3(d) (see also 35 IAC 218.583(a)) [35 IAC 218.583(c)(1)];

ii. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system [35 IAC 218.583(c)(2)]; and

iii. Repair, replace or modify any worn out or malfunctioning component or element of design [35 IAC 218.583(c)(3)].

c. Pursuant to 35 IAC 218.583(d), each operator of a gasoline dispensing operation shall:

i. Maintain and operate each vapor control system in accordance with the owner's instructions [35 IAC 218.583(d)(1)];

ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system [35 IAC 218.583(d)(2)];

iii. Maintain gauges, meters or other specified testing devices in proper working order [35 IAC 218.583(d)(3)]; and

iv. Operate the vapor collection system and delivery vessel unloading points in a manner that prevents:

A. A reading equal to or greater than 100 percent of the LEL (measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B [35 IAC 218.583(d)(4)(A)]; and

B. Avoidable leaks of liquid during the filling of storage tanks [35 IAC 218.583(d)(4)(B)].

7.7.6 Emission Limitations

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

a. Emissions from the affected tanks shall not exceed the following limits:

VOM Emissions	
(Ton/Month)	(Ton/Year)
0.2	1.82

These limits are based on standing, working, dispensing and spillage loss calculated using AP-42 emission factors.

The above limitations were established in Permit 94050067, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. 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).

7.7.7 Testing Requirements

a. Pursuant to 35 IAC 218.583(a)(4), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless the owner or operator of a gasoline dispensing operation demonstrates compliance with Condition 7.7.3(d)(iii) (see also 35 IAC 218.583(a)(3)), by March 15, 1995 or 30 days after installation of each pressure/vacuum relief valve, whichever is later, and at least annually thereafter, by measuring and recording the pressure indicated by a pressure/vacuum gauge at each tank vent pipe. The test shall be performed on each tank vent pipe within two hours after product delivery into the respective storage tank. For manifold tank vent systems, observations at any point within the system shall be adequate. The owner or operator shall maintain any records required by this Condition for a period of three years.

b. Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of Condition 7.7.5(c)(iv)(A) (see also 35 IAC 218.583(d)(4)(A)) [35 IAC 218.583(d)(5)].

c. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the Reid vapor pressure of gasoline and the ethanol content of ethanol blend gasolines shall be determine according to the methods specified below:

i Pursuant to 35 IAC 218.585(d), all sampling of gasoline required pursuant to the provisions of Conditions 7.7.7(c)(ii) and (c)(iii) (see also 35 IAC 218.585(e) and (f)) shall be conducted by one or more of the following approved methods or procedures:

A. For manual sampling, ASTM D4057 [35 IAC 218.585(d)(1)];

B. For automatic sampling, ASTM D4177 [35 IAC 218.585(d)(2)]; or

C. Sampling procedures for Fuel Volatility, 40 CFR 80 Appendix D [35 IAC 218.585(d)(3)].

ii. The Reid vapor pressure of gasoline shall be measured in accordance with either test method ASTM D323 or a modification of ASTM D323 known as the "dry method" as set forth in 40 CFR 80, Appendix E. For gasoline - oxygenate blends which contain water-extractable oxygenates, the Reid vapor pressure shall be measured using the dry method test [35 IAC 218.585(e)].

iii. The ethanol content of ethanol blend gasolines shall be determined by use of one of the approved testing methodologies specified in 40 CFR 80, Appendix F [35 IAC 218.585(f)].

7.7.8 Monitoring Requirement

None

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected tank to demonstrate compliance with Conditions 5.5.1 and 7.7.3, pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of the affected tanks pursuant to Condition 7.7.7, 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.

b. The owner or operator of each storage vessel for which construction, reconstruction, or modification is commenced after July 23, 1984 with a design capacity greater than or equal to 40 m^3, but less than 75 m^3 shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Each storage vessel with a design capacity less than 75 m^3 is subject to no other provision of 40 CFR 60 Subpart Kb other than those required by this paragraph. This record shall be kept for the life of the source [40 CFR 60.110b(a), 60.116b(a), and 60.116b(b)].

c. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 IAC Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel [35 IAC 218.129(f)].

d. Pursuant to 35 IAC 218.586(g)(2), records and reports required pursuant to 35 IAC 218.586(c) (see Condition 7.7.3(f)) shall be made available to the Illinois

EPA. Records and reports which shall be maintained by the owner or operator of the gasoline dispensing operation shall clearly demonstrate:

i. That a certified vapor collection and control system has been installed and tested to verify its performance according to its specifications [35 IAC 218.586(g)(2)(A)].

ii. That proper maintenance has been conducted in accordance with the manufacturer's specifications and requirements [35 IAC 218.586(g)(2)(B)].

iii. The time period and duration of all malfunctions of the vapor collection and control system [35 IAC 218.586(g)(2)(C)].

iv. The motor vehicle fuel throughput of the operation for each calendar month of the previous year [35 IAC 218.586(g)(2)(D)].

v. That operators and employees are trained and instructed in the proper operation and maintenance of the vapor collection and control system and informed as to the potential penalties associated with the violation of any provision of 35 IAC 218 [35 IAC 218.586(g)(2)(E)].

e. Design information for the tank showing the presence of a permanent submerged loading pipe.

f. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe.

g. The throughput of the affected tank (gal/mo and gal/yr).

h. The annual VOM emissions from the affected tank based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected tanks 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. Any storage of VOL in an affected tank that is not in compliance with the requirements of Conditions 7.7.3(c) and (d)(i) (see also 35 IAC 218.122(b) and 218.583(a)(1)), e.g., no "permanent submerged loading pipe," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

b. Any storage of VOL in an affected tank that is out of compliance with the requirements of Conditions 7.7.3(c) and (d)(i) (see also 35 IAC 218.122(b) and 218.583(a)(1)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

c. The storage of any VOL or VPL other than the material specified in Condition 7.7.5(a) within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

d. Pursuant to 35 IAC 218.586(g)(1), any gasoline dispensing operation subject to 35 IAC 218.586(c) (see Condition 7.7.3(f)) shall retain at the operation copies of the registration information required at 35 IAC 218.586(h) below:

    i. Upon the installation of a vapor collection and control system, the owner or operator of the gasoline dispensing operation submits to the Agency a registration which provides at minimum the operation name and address, signature of the owner or operator, the CARB Executive Order Number for the vapor collection and control system to be utilized, the number of nozzles (excluding diesel or kerosene) used for motor vehicle refueling, the monthly average volume of motor vehicle fuel dispensed, the location (including

contact person's name, address, and telephone number) of records and reports required by this Section, and the date of completion of installation of the vapor collection and control system [35 IAC 218.586(h)(1)].

ii. The registration is submitted to the Agency within 30 days of completion of such installation [35 IAC 218.586(h)(2)].

iii. A copy of the registration information is maintained at the gasoline dispensing operation [35 IAC 218.586(h)(3)].

iv. Upon the modification of an existing vapor collection and control system, the owner or operator of the gasoline dispensing operation submits to the Agency a registration that details the changes to the information provided in the previous registration of the vapor collection and control system and which includes the signature of the owner or operator. The registration must be submitted to the Agency within 30 days of completion of such modification [35 IAC 218.586(h)(4)].

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.7.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from each affected tank, the current version of the TANKS program is acceptable.

7.8 Unit Boilers #1, #2, and #3

7.8.1 Description

Three boilers fired with natural gas with propane as a backup. The boilers are used to produce process steam.

7.8.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Boiler #1	60 mmBtu/hr Natural Gas & Propane Fired	April 1972	None
Boiler #2	60 mmBtu/hr Natural Gas & Propane Fired	April 1972	None
Boiler #3	40 mmBtu/hr Natural Gas & Propane Fired	April 1972	None

7.8.3 Applicability Provisions and Applicable Regulations

a. The “affected boilers” for the purpose of these unit-specific conditions, are the boilers described in Conditions 7.8.1 and 7.8.2.

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

c. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.8.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected boilers not being subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because the affected boilers where constructed, modified, or reconstructed before June 9, 1989, pursuant to 40 CFR 60.40c(a).

b. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 218.303].

7.8.5 Operational and Production Limits and Work Practices

a. Natural Gas and propane shall be the only fuels fired in the affected boilers.

7.8.6 Emission Limitations

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

7.8.7 Testing Requirements

None

7.8.8 Monitoring Requirement

None

7.8.9 Recordkeeping Requirements

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

a. Natural gas fuel usage for the affected boilers (scf/yr).

b. Propane fuel usage for the affected boilers (gallons/yr).

7.8.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected boilers 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. Emissions of CO from an affected boiler in excess of the limits specified in Condition 7.8.3 within 30 days of such an occurrence.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.8.12 Compliance Procedures

a. Compliance provisions addressing Condition 7.8.3(c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of the affected boilers.

b. Compliance with the emission limits in Condition 5.5 shall be based on the recordkeeping requirements in Condition 7.8.9 and the emission factors and formulas listed below. Note: Any emission test data from a representative emission source or more recent emission factor may be used:

i. Emission factors for the affected boiler burning natural gas:

Pollutant	Emission Factor (lb/mmscf)
NOx	100.0
PM	7.6
SO2	0.6
VOM	5.5

These are emission factors determined for the affected boilers using standard AP-42 emission factors burning natural gas.

Emissions formula for the affected boiler burning natural gas:

Appropriate Boiler Emissions (ton/yr) = Natural Gas Consumed (scf/yr) x The Appropriate Emission Factor (lb/mmscf) ÷ 1,000,000 ÷ 2,000

ii. Emission factors for the affected boiler burning propane:

Pollutant	Emission Factor (lb/1000 gal)
NO_x	19.0
CO	32.0
PM	0.6
VOM	0.5

These are emission factors determined for the affected boilers using standard AP-42 emission factors burning propane.

Emissions formula for the affected boiler burning propane:

Appropriate Boiler Emissions (ton/yr) =
Propane Consumed (gal/yr) x The Appropriate Emission Factor (lb/1000 gal) ÷ 1,000 ÷ 2,000

7.9 Air Supply Houses

7.9.1 Description

The four natural gas direct fired air supply houses will be used to heat and ventilate areas of the source.

7.9.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Air House #1	20 mmBtu/hr Natural Gas Fired Air Heater	July 1999	None
Air House #2	20 mmBtu/hr Natural Gas Fired Air Heater	July 1999	None
Air House #3	20 mmBtu/hr Natural Gas Fired Air Heater	July 1999	None
Air House #4	20 mmBtu/hr Natural Gas Fired Air Heater	July 1999	None

7.9.3 Applicability Provisions and Applicable Regulations

a. An “affected heater” for the purpose of these unit-specific conditions, is a fuel combustion emission unit as described in Conditions 7.9.1 and 7.9.2.

b. The affected heaters are subject to the NSPS for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because the construction, modification, or reconstruction is commenced after June 9, 1989 and has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.

c. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 10 mmBtu/hr to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

d. Each affected heater is subject to the emission limits identified in Condition 5.2.2.

7.9.4 Non-Applicability of Regulations of Concern

a. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 218.303].

b. The control requirements of 35 IAC 218 Subpart TT shall not apply to fuel combustion units [35 IAC 218.980(f)].

c. This permit is issued based on the affected heaters not being subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, because the affected heaters are less than 73.2 MW (250 mmBtu/hr).

7.9.5 Operational and Production Limits and Work Practices

a. Natural gas shall be the only fuel fired in the affected heaters.

b. Natural gas usage by the affected heaters shall not exceed 64.8 mmscf/month and 518.4 mmscf/year.

7.9.6 Emission Limitations

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

a. Emissions from the affected heaters shall not exceed the following limits when natural gas is being used to fire the affected heaters:

PM		SO_2		VOM	
(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
0.25	1.97	0.02	0.16	0.17	1.30

CO		NO_x	
(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
0.49	3.89	3.89	31.10

These limits are based on the usage limits in Condition 7.9.5(b) and emission factors and formulas in Condition 7.9.12(b).

The above limitations were established in Permit 99060048, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification

addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. 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).

7.9.7 Testing Requirements

None

7.9.8 Monitoring Requirements

None

7.9.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected heaters to demonstrate compliance with Conditions 5.5.1 and 7.9.6, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee of each affected heater shall record and maintain records of the amount of fuel combusted during each day [40 CFR 60.48c(g)].

This record shall be maintained by Permittee of the affected heaters for a period of two years following the date of such record [40 CFR 60.48c(i)].

b. Monthly and annual aggregate NO_x, PM, SO_2, and VOM emissions from the affected heaters shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.9.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected heater 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. Natural gas usage from the affected heaters in excess of the limits specified in Condition 7.9.5(b).

b. Emissions in excess of the limits specified in Condition 7.9.6(a).

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.9.12 Compliance Procedures

a. Compliance with Condition 7.9.3(c) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected heaters.

b. Compliance with the emission limits in Conditions 5.5 and the limits in Condition 7.9.6 are determined by the following emission factors and emission formulas listed below:

i. Emission factors for the affected heaters when fired by natural gas:

Pollutant	Emission Factor (lb/mmscf)
PM	7.6
SO_2	0.6
VOM	5.0
CO	15.0
NO_x	120.0

These are emission factors determined for the affected heaters using standard AP-42 emission factors and manufacturer’s specifications for natural gas.

ii. Emission formula for the affected heaters:

Appropriate Emissions (ton) = Natural Gas Consumed (mmscf) * The Appropriate Emission Factor (lb/mmscf) ÷ 2,000 lb/ton

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after December 29, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

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

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

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

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

8.5 Testing Procedures

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

of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

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

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

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

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

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

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

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

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be

submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
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
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

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

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

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

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

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

b. Other records required by this permit shall be retained for a period of at least 5 years from the

date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

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

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee

shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

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

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

a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

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

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

where:

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

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

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

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

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

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

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

10.2 Attachment 2 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: _____

JRC:psj

I. INTRODUCTION

This source has applied for a 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.

Ford Motor Company is located at 12600 South Torrence Ave. in Chicago. The source is a motor vehicle assembly plant. Emissions from the plant are primarily emitted from the various coating operations.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Phosphate Operation Hot Water Heaters	Phosphate Coating	July 1997	None
E-Coat Dip Tank System	Electrodeposition tank with 47 mmBtu/hr Natural Gas fired Curing Oven	June 1976	None
Prime Coat Operations	Coating Line with 15 mmBtu/hr Natural Gas fired Curing Oven with three 20 mmBtu/hr Natural Gas fired Air Make-up Units	April 1972	Wet Scrubber #1
Topcoat Coating Lines #1 and #2	Coating Lines with three 10 mmBtu/hr Natural Gas fired Curing Ovens with five 20 mmBtu/hr Natural Gas fired Air Make-up Units on each Coating Line (200 mmBtu/hr Total)	April 1972	Wet Scrubber #2 & #3 and a Single 16 mmBtu/hr Natural Gas fired Afterburner
Vehicle Striping Operations	Coating Line	April 1972	None
Final Repair Coating Line	Coating Line	April 1972	Wet Scrubber #4
Glass Installation I Process and Blackout Operation	Coating Line with an insignificant 6 mmBtu/hr Air Make-up Unit	February 1983	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
Tutone/Repair Coating Line	Coating Line with a 10 mmBtu/hr Natural Gas fired Curing Oven	April 1972	Wet Scrubber #5
E-Coat Dry Scuff Booth	Correction of surface imperfections from the E-Coat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #1
Prime Coat Dry Scuff Booth	Correction of surface imperfections from the Prime Coat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #2
Topcoat Dry Scuff Booth	Correction of surface imperfections from the Topcoat coating line with an insignificant 6 mmBtu/hr Air Make-up Unit	June 1976	Dry Fabric Filter #3
Glass Installation II Process	Final Glass Installation	April 1972	None
Sealer & Adhesive Application Processes	Application of Sealers and Adhesives	April 1972	None
Solvent Use Areas	Various types of solvent are used for cleaning and purging	April 1972	None
Tank #1	12,000 gallon gasoline storage tank	June 1993	None
Tank #2	12,000 gallon gasoline storage tank	June 1993	None
Tank #3	12,000 gallon gasoline storage tank	June 1993	None
Boiler #1	60 mmBtu/hr Natural Gas & Propane Fired	April 1972	None
Boiler #2	60 mmBtu/hr Natural Gas & Propane Fired	April 1972	None
Boiler #3	40 mmBtu/hr Natural Gas & Propane Fired	April 1972	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	3,137.9
Sulfur Dioxide (SO_2)	1.3
Particulate Matter (PM)	483.1
Nitrogen Oxides (NO_x)	333.7
HAP, not included in VOM or PM	---
TOTAL	3,956.0

This permit is a combined Title I/CAAPP permit that 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 by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

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

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains 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.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the 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.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 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, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for 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 164.

JRC:psj