

PROPOSED CAAPP PERMIT
November 1, 2007

217/782-2113

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

PERMITTEE:

Silgan Containers Manufacturing Corporation
Attn: David Wood
400 North 15th Street
Rochelle, Illinois 60168

I.D. No.: 141805AAF
Application No.: 95120230

Date Received: January 30, 2006
Date Issued: To Be Determined
Expiration Date¹: To Be Determined

Operation of: Sanitary Can Manufacturing Plant
Source Location: 400 North 15th Street, Rochelle, Ogle County, 60168
Responsible Official: David Wood, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a Sanitary Can Manufacturing Plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

ECB:DGP:psj

cc: Illinois EPA, FOS, Region 2
CES
Lotus Notes

1 Except as provided in Conditions 1.5 and 8.7 of this permit.

TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION	4
1.1 Source Identification	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 Source Description	
1.5 Title I Conditions	
2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED	6
3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Applicability of Clean Air Act Permit Program (CAAPP)	
5.2 Area Designation	
5.3 Source-Wide Applicable Provisions and Regulations	
5.4 Source-Wide Non-Applicability of Regulations of Concern	
5.5 Source-Wide Control Requirements and Work Practices	
5.6 Source-Wide Production and Emission Limitations	
5.7 Source-Wide Testing Requirements	
5.8 Source-Wide Monitoring Requirements	
5.9 Source-Wide Recordkeeping Requirements	
5.10 Source-Wide Reporting Requirements	
5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios	
5.12 Source-Wide Compliance Procedures	
6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS	19
7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS	20
7.1 Coating Lines Vented to VOM Control Equipment	
7.2 Coating Lines and Other Operations Not Vented to Control Equipment	
8.0 GENERAL PERMIT CONDITIONS	36
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	

	<u>Page</u>
8.5 Testing Procedures	
8.6 Reporting Requirements	
8.7 Title I Conditions	
9.0 STANDARD PERMIT CONDITIONS	41
9.1 Effect of Permit	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirements for Compliance Certification	
9.9 Certification	
9.10 Defense to Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening and Reissuing Permit for Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	
9.15 General Authority for the Terms and Conditions of this Permit	
10.0 ATTACHMENTS	
1 Example Certification by a Responsible Official	1-1
2 Emissions of Particulate Matter from Process Emission Units	2-1
3 Compliance Assurance Monitoring (CAM) Plan	3-1
4 Guidance	4-1

1.0 INTRODUCTION

1.1 Source Identification

Silgan Containers Manufacturing Corporation
400 North 15th Street
Rochelle, Illinois 60168
815/562-1250

I.D. No.: 141805AAF
County: Ogle
Standard Industrial Classification: 3411, Fabricated Metal Products -
Metal Cans

1.2 Owner/Parent Company

Silgan Containers Manufacturing Corporation
21800 Oxnard Street, Suite 600
Woodland Hills, California 91367

1.3 Operator

Silgan Containers Manufacturing Corporation
400 North 15th Street
Rochelle, Illinois 60168

Diane Sackmann, 815/562-1250

1.4 Source Description

The Silgan Containers Manufacturing Corporation is located at 400 North 15th Street in Rochelle. The source is involved in manufacturing of coating sheet steel for use in sanitary food cans. The source also produces converted or easy-open ends using pre-coated sheet steel. The primary emissions are from organic solvents in the coatings. There are also storage tanks for the coatings.

Note: This narrative description is for informational purposes only and is not enforceable.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
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
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
mscf	Millions of Standard Cubic Feet
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas)
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
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
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 CONDITIONS FOR 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:

Video marking units

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

UV Litho Coating Line (on Line 3)
Scrap Handling System with Cyclone^a

^a The cyclone is an integral part of the system and not a control device. Emissions in the absence of the cyclone would be less than 0.44 tons/year.

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

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

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

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)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

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 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 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 (see Attachment 2) and 35 IAC Part 266. 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.
- 3.2.2 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, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.
- 3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70°F, the Permittee shall comply with the applicable requirements of 35 IAC 215.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.

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
Section 7.1			
Unit 1	Sheet Coaters #1, 2 and Sheetfed Lithographic Press Line 3. Oven for each line is vented directly to Ross RTO. Lithographic press and coaters and other non-VOM generating equipment around the press/coaters are within PTEs and vent to a Munter Concentrator. The desorbed concentrator vapors then vent to the Ross RTO.	Pre-1993 and 2001	Permanent Total Enclosure, Munter Concentrator and Ross Regenerative Thermal Oxidizer (RTO)
Unit 2	Post Coaters 1 to 7. (Post Repair Spray Operations) Cool overspray on each line vents to M&W Concentrator. The desorbed concentrator vapors, along with the direct oven vapors from each line, vent to Stealth RTO.	2001	M&W Concentrator and Stealth Regenerative Thermal Oxidizer (RTO)
Unit 3	Post Coaters 9 to 13. (Post Repair Spray Operations) Cool overspray and ovens vent directly to PEI RTO	2002	PEI RTO

Section 7.2			
Press Line No.	Conversion Presses	Tab Lube	End Liners w/"mistors"
1	1	1	3
2	1	1	2
3	2	1	2
4	2	1	2
7	1	1	1

Section 7.2		
Storage Tank Contents	Capacity (gal)	Vapor Pressure (psia)
Bulk coating Tank #1	8000	Less than 0.2
Bulk coating Tank #2	8000	Less than 0.2
Bulk coating Tank #3	7000	Less than 0.2
Epoxy Tank	470	Less than 0.2
Polyamide Tank	470	Less than 0.2

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (CO, lead, NO₂, ozone, PM_{2.5}, PM₁₀, SO₂).

5.3 Source-Wide Applicable Provisions and Regulations

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

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

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Pursuant to 35 IAC 212.123(a), 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, except as allowed by 35 IAC 212.123(b) and 212.124.

5.3.3 Ozone Depleting Substances

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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

5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 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 RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B 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 Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.3.6 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, 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 and is incorporated by reference into this permit.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.3.7 PM₁₀ Contingency Measure Plan

Should the actual annual source-wide emissions of PM₁₀ equal or exceed 15 tons, then the Permittee shall prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U. This permit may also have to be revised or reopened to address this regulation (see Condition 9.12.2).

5.4 Source-Wide Non-Applicability of Regulations of Concern

- 5.4.1 This source is not subject to 40 CFR Part 63, Subpart KKKK, because the source is not a major source of HAPs. (See also Condition 5.6.2)
- 5.4.2 This permit is issued based on the source not being subject to 40 CFR Part 60, Subpart WW "Standards of Performance for the Beverage Can Coating Industry", because no beverage can coating is performed at this location.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	248.00
Sulfur Dioxide (SO ₂)	0.12
Particulate Matter (PM)	1.60
Nitrogen Oxides (NO _x)	21.00
HAP, not included in VOM or PM	----
Total	270.72

5.6.2 Emissions of Hazardous Air Pollutants

- a. Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart KKKK do not apply to the source. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.2, and 5.10.2.
- b. More specifically, emissions of HAPs from this source (all emission units at the Rochelle Facility combined including insignificant emission units) shall not exceed the following limits:

<u>Emission Unit</u>	<u>Individual HAP</u>		<u>Total HAP</u>	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Unit 1 - Sheet Coaters	---	---	1.0	8.5
Unit 2 - End Liners	---	---	0.7	6.0
Unit 3 - Post Repair Spray	---	---	0.6	4.0
Solvent Cleanup	---	---	0.1	1.0
Other - Videojet and Tanks	---	---	<u>0.1</u>	<u>0.5</u>
Total	<u>1.0</u>	<u>8.0</u>	<u>2.5</u>	<u>20.0</u>

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

The above limits are from Construction Permit 06030009 [T1].

5.6.3 Other Source-Wide Production and Emission Limitations

- a. The annual material usages and VOM emissions from all units at the source combined, including insignificant emission units, shall not exceed the following limitations:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
End Compound	9,853	78,817	17.7	141.6
Mister	223	1,784	0.8	5.6
Tab Lube	1,037	8,295	3.2	25.3
Post Repair Spray	13,675	109,395	2.3	18.5
Sheet Coating	----	----	5.0	40.0
Solvent Cleanup	525	4,196	1.8	14.0
Other	----	----	0.4	3.0
			Total	248.0

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).

- b. The above limitations were established in Permit 06030009, pursuant to PSD, 40 CFR 52.21. 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 the federal rules for PSD [T1].

It should be noted that this limit of 248.0 tons of VOM per year has been in several previous construction permits but each has been a plant wide limit and are not cumulative. The individual limits (i.e. end compound, sheet coating etc.) have changed from one permit to the next but not the total VOM limit of 248.0. The individual limits in permit 06030009 supersede any other previously issued construction permits. The individual limits are also for all units at the source and not just the ones in that construction permit. For example, the end compound usage is for all end liners at the source and not just those constructed pursuant to Construction Permit 06030009.

5.7 Source-Wide Testing Requirements

- 5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in

accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

- a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:
 - Test the top five coatings that make the largest contributions to individual and total HAP emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.
- b. Testing may be conducted by the supplier of the HAP-containing material.
- c. The calculation as to whether the 80% of major source threshold (see Condition 5.6.2(b) was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.

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

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7) (b) of the Act.

5.9.2 Records for HAP Emissions

The Permittee shall maintain records of HAP emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7) (b) of the Act.

- a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7) (b) of the Act.
- b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.
- c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each coating, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 - 3%) then the highest value shall be used.
- d. The Permittee shall keep a record of the applicability determination for 40 CFR 63, Subpart KKKK at the source for a period of five years after the determination. This determination shall include a detailed analysis that demonstrates why the Permittee believes the source is not subject to 40 CFR 63, Subpart KKKK [40 CFR 63.10(b) (3)].

5.9.3 Records for Other Source-Wide Emission Limitations

Records to verify that the annual material usages and VOM emissions from all units at the source combined do not exceed the limitations in Condition 5.6.3(a).

5.9.4 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.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7) (f) (ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

- a. Emissions of HAPs from the affected source in excess of the limits specified in Condition 5.6.2 within 30 days of such occurrence.
- b. Emissions of VOM from the affected source in excess of the limits specified in Condition 5.6.3 within 30 days of such occurrence.

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there are provisions for unit specific operational flexibility set forth in Section 7 of this permit.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

This section is reserved for emissions control programs. As of the date of issuance of this permit, there are no such programs applicable to this source.

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Coating Lines Vented to VOM Control Equipment

7.1.1 Description

In the initial process of making a can, cut metal sheet stock is coated on one or two sides, depending on the raw material and the specification for the can. The coating is applied to the metal surface using an offset type coater. The metal sheets are passed through the coating roller and the backing roller one at a time. The coating roller transfers the coating to the metal sheet as it passes through the rollers. After the metal sheets are printed or coated, they are conveyed into a curing oven where the solvents are evaporated and the coating cured. The VOM emissions released in the oven are exhausted into a regenerative thermal oxidizer (RTO). The sheetfed lithographic printing press feeds to the existing Wagner Coater and existing oven (Line #3). The press will apply coating/inks to metal sheets. The existing coating line will continue to be bottlenecked by its dryer.

In the post repair process, ends that have been cut or scored in the conversion press are re-sealed with a coating to protect the contents of a filled container against corrosion. The post repair spray operation is controlled by a new concentrator and an existing thermal oxidizer. The purpose of the concentrators is to convert a high-volume, low-VOM, air stream into a high-VOM, lower-volume exhaust.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 1	Sheet Coaters #1, 2 and Sheetfed Lithographic Press Line 3. Oven for each line is vented directly to Ross RTO. Lithographic press and coaters and other non-VOM generating equipment around the press/coaters are within PTEs and vent to a Munter Concentrator. The desorbed concentrator vapors then vent to the Ross RTO.	Pre-1993 and 2001	Permanent Total Enclosure, Munter Concentrator and Ross Regenerative Thermal Oxidizer (RTO)

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 2	Post Coaters 1 to 7. (Post Repair Spray Operations) Cool overspray on each line vents to M&W Concentrator. The desorbed concentrator vapors, along with the direct oven vapors from each line, vent to Stealth RTO.	2001	M&W Concentrator and Stealth Regenerative Thermal Oxidizer (RTO)
Unit 3	Post Coaters 9 to 13. (Post Repair Spray Operations) Cool overspray and ovens vent directly to PEI RTO	2002	PEI RTO

7.1.3 Applicable Provisions and Regulations

- a. The "affected sheet coating line" for the purpose of these unit-specific conditions, is a sheet coating line described in Conditions 7.1.1 and 7.1.2.
- b. The "affected post repair spray operation" for the purpose of these unit-specific conditions, is a post repair spray operation described in Conditions 7.1.1 and 7.1.2.
- c. Each affected coating line is subject to one of the following:
 - i. Each affected coating line is subject to 35 IAC Part 215, Subpart F, Coating Operations: No owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of VOM, delivered to the coating applicator [35 IAC 215.204(b)]:

	<u>kg/l</u>	<u>lb/gal</u>
Sheet Basecoat and Overvarnish	0.34	2.8
Interior Body Spray Coat	0.51	4.2
Exterior End Coat	0.51	4.2

- ii. Owners and operators of coating lines subject to 35 IAC 215.204 may comply with 35 IAC 215.205, rather than with 35 IAC 215.204. The methods or procedures used to determine emissions of organic material under 35 IAC 215.205 shall be approved by the Illinois EPA. Emissions of VOM from sources subject to 35 IAC

215.204, are allowable, notwithstanding the limitations in 35 IAC 215.204, if the emissions are controlled by an afterburner system which provides:

- A. 75% reduction in the overall emissions of VOM from the coating line; and
 - B. Oxidation to carbon dioxide and water of 90% of the nonmethane volatile organic material (measured as total combustible carbon) which enters the afterburner [35 IAC 215.205(a)].
- d. Each coating line is subject to 35 IAC 212.321 (Subpart L). The method the calculate allowable particulate matter emissions is presented in Attachment 2.
 - e. The Permittee is authorized to operate Unit 1 above when the Munter concentrator is not functioning due to routine maintenance or repair up to 100 hours per calendar year provided that compliance with Conditions 5.6.2, 5.6.3(a) and 7.2.3(c) (ii) is demonstrated.

This demonstration may be performed by showing through emission testing or other means that a sufficient amount of VOM from the drying ovens exclusively is vented to the RTO so that there is an overall 75% reduction in VOM emissions on an hourly basis and that annual emissions from the sheet coating process (Unit 1) are less than 40 tons on a running total of 12 months of operation.

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected coating lines not being subject to 35 IAC 215.301 and 215.302, pursuant to 35 IAC 215.209.
- b. This permit is issued based on the affected coating line not being subject to 40 CFR Part 60, Subpart WW "Standards of Performance for the Beverage Can Coating Industry", because no beverage can coating is performed at this location.
- c. This permit is issued based on the Permittee not using the compliance option available under 35 IAC 215.207, Compliance by Aggregation of Emission Units. Although this method remains an option, the Permittee must request Illinois EPA approval to use this method and the Permittee has not requested such approval.

7.1.5 Control Requirements and Work Practices

- a. Each affected coating line and regenerative thermal oxidizer (RTO) shall only be operated with natural gas as the fuel.

- b. Each RTO and the capture system leading to it shall be in operation at all times that the associated coating lines are in operation and applying coatings/inks in exceedance of the limit established in Condition 7.1.3(c) (i) except as noted in condition 7.1.3(e). The permanent total enclosure is part of the capture system.
- c. The RTOs shall not be seasonally shut down as would be allowed in 35 IAC 215.106.
- d. Each RTO combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400F before the coating operation is begun, and this temperature shall be maintained during operation of any of the affected coating operations that is applying coatings/inks in exceedance of the limit established in Condition 7.1.3(c) (i).
- e. The RTO and its associated capture system fan shall be equipped with an automatic switch that will shut down the sheet feeders and the post repair spray operations that vent to the oven should the temperature drop below the minimum set point or the fan shuts down.
- f. The concentrator/RTO systems shall be operated to achieve at least 100 percent capture and 95 percent overall control efficiency for VOM, except as noted in condition 7.1.3(e). Note: This requirement is more stringent than the control requirements of Condition 7.1.3(c) (ii) [T1R, 02030005].
- g. To qualify as permanent total enclosure (PTE), the enclosure installed on the affected sheet feeders and post repair spray operations shall meet the requirements for a PTE established in 35 IAC 218, Appendix B, Procedure T, so that the capture efficiency of VOM on the affected post repair spray operation may be presumed to be 100 percent [T1, 02030005].
- h. The Permittee shall follow good operating practices for the RTOs and their associated capture systems, including periodic inspection, routine maintenance and repair of defects. If there are any doors that must remain closed to meet the requirements for a PTE then there must be permanent posters on those doors stating that whenever the emitting units are in operation the doors must remain closed except when entering or leaving. If the fan exhausting air from the PTE to the concentrator shuts down, an alarm must sound or the system automatically shut down.

7.1.6 Production and Emission Limitations

Production and emission limitations are not set for the affected coating lines. However, there are source-wide production and

emission limitations set forth in Condition 5.6.3 that include limits on these individual operations, sheet coating and post repair spray operations.

7.1.7 Testing Requirements

- a. Upon request from the Illinois EPA or USEPA the Permittee shall conduct tests in accordance with procedures of 35 IAC 215.102 to measure the overall control and performance of an thermal oxidizer controlling the affected coating lines including the associated capture system. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. Overall control includes measurement of capture efficiency of all lines and the efficiency of the concentrator.
- b. If the Permittee chooses to comply with Condition 7.1.3(c) (i) rather than (c) (ii) (i.e. the use of compliant coatings rather than the use of the control equipment), then annually the VOM content of each coating applied on the affected coating line shall be determined by using Method 24 of 40 CFR 60, Appendix A. Any alternative test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative method will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)]. These tests may be performed by the supplier of the coating provided that the coatings are not diluted with organic solvent before use. If this option is chosen then the requirements of Condition 7.1.5 for the control system do not apply. See Condition 7.1.10(c) for notification requirements if this option is chosen.

7.1.8 Monitoring Requirements

Compliance Assurance Monitoring (CAM) Requirements

The affected sheet coaters and post repair spray operations are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3, Table 3, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment [40 CFR 64.7(a) and (b)].

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected sheet coaters and post repair spray operations to demonstrate compliance with Conditions 5.6.1, 7.1.3 7.1.5 and 7.1.7, pursuant to Section 39.5(7) (b) of the Act:

- a. The name and identification number of each coating, ink, thinner/thinning solvent and clean-up solvent as applied on each affected coating line;
- b. Usage of each VOM containing material applied on the affected coating line (gallons/month and gallons/year);
- c. VOM content of each such material (lb/gallon, less water);
- d. Density of each applied VOM containing material (lb/gallon);
- e. The usage of clean-up solvent (gallons/month and gallons/year);
- f. Records of natural gas usage (mscf/month and mscf/year);
- g. Total VOM emissions (tons/month and tons/year) calculated based on the recordkeeping requirements along with compliance procedures from Condition 7.1.12;
- h. Total emissions from the natural gas combustion (tons/month and tons/year) calculated based on the recordkeeping requirements along with compliance procedures from Condition 7.1.12; and
- i. Records for Compliance Assurance Monitoring (CAM) Requirements

The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements in Condition 7.1.8, as required by 40 CFR 64.9(b) (1).

7.1.10 Reporting Requirements

- a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected sheet coaters and post repair spray operations 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:

- i. Emissions of VOM from the affected sheet coaters and post repair spray operations in excess of the limits specified in Condition 7.1.3I(ii) within 30 days of such occurrence.
 - ii. Operation of the affected sheet coaters and post repair spray operations not meeting the requirements specified in Condition 7.1.5 within 30 days of such occurrence.
- b. Reporting of Compliance Assurance Monitoring (CAM)

The Permittee shall submit monitoring reports to the Illinois EPA in accordance with Condition 8.6.1 and shall include, at a minimum, the information required under Condition 8.6.1 and the following information:

 - i. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken [40 CFR 64.6I(3) and 64.9(a)(2)(i)]; and
 - ii. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks [40 CFR 64.6I(3) and 64.9(a)(2)(ii)].
- c. Although this permit includes the option to comply by using compliance coatings [Condition 7.1.3(c)(i)] rather than the expected compliance by use of control equipment [Condition 7.1.3(c)(ii)], the Permittee must notify the Illinois EPA if it changes to the use of compliant coatings. This notification shall include the VOM content of all the new coatings and a demonstration that the specific limits in Condition 5.6.3 will not be violated as well as Condition 7.1.3. Note that sheet coating operation and post repair spray operation are independent operations and one operation may change compliance method but not the other.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

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

Changes in the coatings and clean-up solvents used, provided that the affected sheet coaters and post repair spray operation

continues to comply with all emission limitations and standards of this subsection.

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(c)(ii), the expected method of compliance, is addressed by the requirements of Conditions 7.1.5(b)-(h), the VOM testing requirements in Condition 7.1.7(a), the continuous temperature monitoring (CAM) requirements in Condition 7.1.8, the records required in Condition 7.1.9, and the reports required in Condition 7.1.10.
- b. Compliance with Condition 7.1.3(c)(i), if employed in the future by one or both of the operations, is addressed by the VOM testing requirements in Condition 7.1.7(b), the records required in Condition 7.1.9, and the reports required in Condition 7.1.10.
- c. Compliance with Condition 7.1.3(d) is addressed by the use of roll coating on the sheet coaters, a type of operation which does not generate PM emissions and by the normal work practices (e.g. small spray in a confined space) inherent in the post repair spray operations. Although the thermal oxidizer is primarily intended as a VOM control device, it can also destroy PM emissions.
- d. Emissions of VOM from the coating operations when employing the thermal oxidizer shall be calculated as follows:
 - i. Emissions from Coating/Printing Operation (EI) =
[Actual Coating/Ink Usage (gal) x Density (lb/gal) x VOM Content (wt. %)] x [Capture Efficiency (capture efficiency, %)/100 x Destruction Efficiency (100-destruction efficiency, %)/100]^a;

^a Less any credit for VOM-containing waste shipped offsite.
 - ii. Emissions from Cleanup Operation (EII) = (Actual Clean-up Solvent Usage (gal/mo) x Average Solvent Density (lb/gal) x VOM Content of the Clean-up Solvent (wt. %) ^a;

^a Less any credit for VOM-containing waste shipped offsite.
 - iii. Total VOM Emissions = EI + EII

Note that if the PTE is operating the capture efficiency can be assumed to be 100%.

- iv. Emissions of VOM from the coating operations when employing compliant coatings shall be calculated as follows:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D]$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \sum (w_i / d_i),$$

Where:

w_i = Percent exempt compound I in the coating,

d_i = Overall density of exempt compound I, lb/gal

and the summation is applied over water and all exempt compounds I in the coating.

- v. Emissions of NO_x, CO, PM and VOM from ovens and the thermal oxidizer burning natural gas shall be calculated based on the standard emission factors for natural gas combustion from AP-42:

<u>Pollutant</u>	<u>Natural Gas Emission Factors (lb/10⁶ ft³)</u>
PM	7.6
NO _x	100.0
VOM	5.5
CO	88.0

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

Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

7.2 Coating Lines and Other Operations Not Vented to Control Equipment

7.2.1 Description

Sheets of pre-coated metal are pre-cut using scroll shears to provide blanks that are fed into the End Press Process. The End Presses form metal can ends (lids) by stamp forming and cutting the pre-coated blanks. After forming and cutting, the ends go through End Liners where the channel around the perimeter of each end is filled with an end sealing compound or "end compound". The nozzles that apply end compound must be cleaned/lubricated continuously to prevent compound from adhering to the applicator. The operation is referred to as a "mister".

Most of the ends produced by the end presses will be converted to an "easy-open" consumer feature. Lined ends are processed through a conversion presses that scores the end for opening and attaches a pull-tab. Tab lube is used to facilitate forming of the aluminum stock into a pull-tab.

It should be noted that operational lines may include elements from Section 7.1 and several of these operations in Section 7.2. A "line" may include sheet coaters, post spray, misters, conversion presses, table lube and end liners. The emitting parts of the line that vent to VOM control equipment were included in Section 7.1 and the parts not vented to VOM control equipment are included here. There may be more than one identical operation on any line such as two or more post spray operation on one line.

Identification by Press Lines are as follows: Press Line 1 (300 FPEO) [FPEO stands for Full Panel Easy Open], Press Line 2 (300 SOT), Press Line 3 (211 FPEO), Press Line 4 (307 FPEO), Line 6 (Interior Post Coater), and Line 7 (Vision 300).

Note: This narrative description is for informational purposes only and is not enforceable.

7.2.2 List of Emission Units and Air Pollution Control Equipment

- a. The table below normally includes a construction date and a list of emission control equipment. None of these units has control equipment and in this case rule applicability does not depend upon date of construction, which varied from 2001 to 2006. For each construction permit the plant wide limit was kept at 248 ton/yr (see Condition 5.6.3) although there were changes to individual operation limits. The most recent construction permit limit superseded the previous permit limit.
- b. Two special tables have been developed for this Section. There are five press lines and each line may have one or more of three operations occurring along that line. These

operations are conversion presses, tab lube and end liners. For instance, in the first table shown below Press Line No. 4 has two conversion presses, one tab lube and two end liners.

- c. The storage tanks would normally be classified as insignificant emission units based on VOM emissions but these tanks contain enough HAPs that they cannot be classified as insignificant.

Press Line No.	Conversion Presses	Tab Lube	End Liners w/"mistors"
1	1	1	3
2	1	1	2
3	2	1	2
4	2	1	2
7	1	1	1

Storage Tank Contents	Capacity (gal)	Vapor Pressure (psia)
Bulk Coating Tank #1	8000	Less than 0.2
Bulk Coating Tank #2	8000	Less than 0.2
Bulk Coating Tank #3	7000	Less than 0.2
Epoxy Tank	470	Less than 0.2
Polyamide Tank	470	Less than 0.2

7.2.3 Applicable Provisions and Regulations

- a. The "affected end liners" for the purpose of these unit-specific conditions, are end liners described in Conditions 7.2.1 and 7.2.2.
- b. The "affected mistors" for the purpose of these unit-specific conditions, are a process operation used in conjunction with the application of end liner compound and described in Conditions 7.2.1 and 7.2.2.
- c. The "affected conversion presses" for the purpose of these unit-specific conditions, are used for a process operation to make can lids easy to open and described in Conditions 7.2.1 and 7.2.2.
- d. The "affected storage tanks" are fixed-roof tanks used to store various raw materials and described in Conditions 7.2.1 and 7.2.2. If they did not contain HAPs they could qualify as insignificant emission units in Section 3.1.3 of this permit.
- e. Each affected end liner is subject to 35 IAC Part 215, Subpart F, Coating Operations: No owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile

organic material, delivered to the coating applicator [35 IAC 215.204(b) (6)]:

	<u>kg/l</u>	<u>lb/gal</u>
End Sealing Compound Coat	0.44	3.7

Note that there is an option to comply by use of control equipment but since the Permittee does not have any control equipment that option will not be cited.

- f. Each affected conversion press, tab lube and end liner is subject to 35 IAC 212 Subpart L (§212.321). The method to calculate allowable is described in Attachment 2.
- g. The affected conversion presses and tab lube operation are subject to 35 IAC Part 215, Subpart K, Use of Organic Material: The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of Subpart K shall apply only to photochemically reactive material as defined in §211.4690 [35 IAC 215.301].
- h. The affected storage tanks are subject to 35 IAC 215.122(b), which requires the use of a submerged pipe to fill the tank if the tank has a capacity greater than 250 gallons and is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected end liners not being subject to the New Source Performance Standards (NSPS) for the Beverage Can Surface Coating Industry, 40 CFR Part 60, Subpart WW, because the affected end liner is not a beverage can coating line.
- b. No owner or operator of a coating line (i.e. the end liners) subject to the limitations of 35 IAC 215.204 is required to meet the limitations of 35 IAC Part 215, Subpart K (35 IAC 215.301 or 215.302), after the date by which the coating line is required to meet 35 IAC 215.204 [35 IAC 215.209].
- c. This permit is issued based on the affected conversion presses, tab lube operation and end liners not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected conversion presses, tab lube operation and end liners do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Control Requirements and Work Practices

If the VOM emissions from the misters or tab lube used on the conversion presses are classified as photochemically reactive pursuant to the definition in §211.4690 then a usage limit shall be calculated so that emissions of VOM do not exceed 8 lb/hr in order to comply with Condition 7.1.3(g) [§215.301].

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected end liners, conversion presses and storage tank. However, there are source-wide production and emission limitations set forth in Condition 5.6.3 that include limits on these individual operations, end liners, misters and conversion presses. Note that the usage limit for the end liner compound automatically sets a limit for the storage tank.

7.2.7 Testing Requirements

On an annual basis the VOM content of each end liner compound applied on the affected coating lines shall be determined by using Method 24 of 40 CFR 60, Appendix A. Any alternative test method must be approved by the Illinois EPA which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative method will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)]. These tests may be conducted by the supplier of the end compound unless they are diluted on site before application.

7.2.8 Monitoring and Inspection Requirements

If any of the storage tanks store a material with a vapor pressure over 2.5 psia at 70°F then the submerged pipe shall be inspected every other year.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected end liners, conversion presses and storage tank to demonstrate compliance with Conditions 5.6.1, 7.1.3 and 7.1.5, pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each coating, mister, tab lube and clean-up solvent as applied on the affected end liners and conversion presses. If the coatings that must comply with Condition 7.2.3(e) are diluted on site with organic solvent then records of the dilution ratio must be kept;

- b. Usage of each VOM containing material applied on the affected end liners and conversion presses (gallons/months and gallons/year);
- c. If the VOM content of the tab lube or "mister" classify the emissions as photochemically reactive, the hourly VOM emission rate (each individual hour is not necessary if the typical emission rate can be shown to be below 8 lb/hr);
- d. VOM content of each such material (lb/gallon, less water) either from formulation data by the supplier or from the special tests required by Condition 7.2.8;
- e. Density of each applied coating and clean-up solvents (lb/gal);
- f. The usage of clean-up solvent (gal/month and gal/year);
- g. Amount of VOM-containing materials sent offsite for recovery and the VOM content of the material if appreciably different from the raw material (gal/month and wt. percent); and
- h. Total VOM emissions (tons/month and tons/year) calculated based on the recordkeeping requirements along with compliance procedures from Condition 7.2.12.

Note that if end compound VOM emissions are calculated from purchase records (beginning inventory plus purchase minus ending inventory and recycled amount) then VOM emissions from the storage tank do not need to be calculated as the losses would be already be included in that calculation. However, if VOM emissions are calculated from end compound sent to the applicators, then VOM emissions from the storage tank would need to be calculated. See compliance procedures in Condition 7.1.12.

- h. Record of biannual inspection of submerged pipe if the vapor pressure of the material in the end compound storage tank is over 2.5 psia.

7.2.10 Reporting Requirements

- a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected end liners, conversion presses and storage 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:

- i. Emissions of VOM from the affected end liners, conversion presses and storage tank in excess of the limits specified in Condition 7.2.3 within 30 days of such occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

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

Changes in the materials used and the products produced on the affected end liners as long as these emission units continue to comply with all emission limitations and requirements of this subsection.

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(e) is addressed by the testing requirements in Condition 7.2.7, and the records and reports required in Conditions 7.2.9 and 7.2.10.
- b. Compliance with Condition 7.2.3(f) is addressed by the low volume coating operations or other solvent-borne operations being conducted indoors with no visible emissions outside of the building.
- c. Compliance with Condition 7.2.3(g) is addressed by the requirements of Condition 7.2.5 and the records and reports required in Conditions 7.2.9 and 7.2.10.
- d. Compliance with Condition 7.2.3(h) is addressed by the monitoring requirements in Condition 7.2.8 records and reports required in Conditions 7.2.9 and 7.2.10.
- e. Emissions of VOM from the coating operations, tab lube and conversion presses shall be calculated as follows:

$$\text{VOM Content of Material} = V \times D / [1 - W \times D]$$

Where:

V = Percent VOM in the material (%)

D = Overall material density (lb/gal)

$$W = \sum (w_i/d_i),$$

Where:

w_i = Percent exempt compound I in the material,

d_i = Overall density of exempt compound I, lb/gal

and the summation is applied over water and all exempt compounds I in the material.

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 _____ (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

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 Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7) (f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:
 - i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

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

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

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

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- 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, pursuant to Section 39.5(7)(j) and (p) of the Act, 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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

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

practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; 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 regulated 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. At 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 including any logs, plans, procedures, or instructions required to be kept 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, Air Quality Planning 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 Unit, 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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

- 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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- 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 [Section 39.5(7)(k)(iv) of the Act].

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, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, 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 that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

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

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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and 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

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

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

- ii. 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,

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

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

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

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

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

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
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

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

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

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

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

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

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

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

Table 3. PSEU Designation:	Unit 1 (Sheet Coaters)
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators:	#1: RTO Combustion chamber Temperature	#2: Concentrator Differential Pressure
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GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Thermocouples	Magnehelic gauge or pressure switch
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Temperature must be over 1400°F; Set point is 1440°F	Differential pressure across rotor process - 0.88 to -0.71 WC per manufacturer's specs
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	188 hours per 6-month period	188 hours per 6-month period

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Thermocouples are installed directly into the combustion chamber	Pressure sensing devices in the appropriate ductwork for RTO and concentrator exhaust from process
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	The thermocouples will be calibrated or replaced a minimum of once per year	The pressure sensing devices will be calibrated or replaced a minimum of once per year
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	The accuracy of the thermocouples will be checked a minimum of once per year by calibration	The accuracy of the pressure drops will be checked a minimum of once per year by calibration
THE MONITORING FREQUENCY:	Continuous	Once per day
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Continuous by paper chart recorder or electronic recording	Recorded once per day
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	One hour averaging period	No average

Table 3. PSEU Designation:	Unit 1 (Sheet Coaters)
Significant Emission Unit Section:	7.1
Pollutant:	VOM

Indicators: #1: Concentrator Desorption Chamber Temperature

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	Thermocouple
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Set point is 360°F per manufacturer; kept within 20°F of the set point
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	188 hours per 6-month period

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	Thermocouple is installed directly in the desorption chamber
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	The thermocouple will be calibrated or replaced a minimum of once per year
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	The accuracy of the thermocouples will be checked a minimum of once per year by calibration
THE MONITORING FREQUENCY:	Displayed continuously but only recorded daily
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Recorded daily
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	No averaging period

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf

www.epa.state.il.us/air/permits/197-fee.pdf

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