217/782-2113

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

PERMITTEE:

Godfrey Conveyor Company, Inc.
Attn: James Orbik
4500 Middlebury Street
Elkhart, Indiana 46516

I.D. No.: 055005ABP
Application No.: 04110072

Date Received: November 29, 2004
Date Issued: October 6, 2005
Expiration Date[1]: October 6, 2010

Operation of: Godfrey Marine Illinois LLC, Boat Manufacturing Plant
Source Location: 10231 Sugar Creek Road, Benton, Franklin County, 62812
Responsible Official: James Orbik, Chief Operating Officer

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

Revision Date Received: May 2, 2007
Revision Date Issued: September 20, 2007
Purpose of Revision: Administrative Amendment

This administrative amendment changes the responsible official for the facility. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supercedes those terms and conditions of the permit for which the conflict exists. The previous permit issued October 6, 2005 is incorporated herein by reference. Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

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

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

ECB:KKD:psj

cc: Illinois EPA, FOS Region 3
CES
Lotus Notes

1 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Godfrey Marine Illinois LLC
10231 Sugar Creek Road, Franklin County
Benton, Illinois 62812
618/439-9370

I.D. No.: 055005ABP
County: Franklin
Standard Industrial Classification: 3732, Boat Building and Repair

1.2 Owner/Parent Company

Godfrey Conveyor Company, Inc.
Attn: James Orbik
4500 Middlebury Street
Elkhart, Indiana 46516

1.3 Operator

Godfrey Conveyor Company, Inc.
Attn: James Orbik
4500 Middlebury Street
Elkhart, Indiana 46516

James Orbik, Chief Operating Officer
574/522-8381

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
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
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 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:

4 Natural Gas Heaters 3.17 mmBtu each
2 Polyurethane Foam Parts

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:

None

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

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

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

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 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
Gel Coat Operations	Three Gel Coat Spray Booths Each Containing a Basecoat Color Gun, Backup Basecoat Color Gun and Six Color Gun	2003	Filters
Lamination Operations	Nine Laminating Areas	2003	Filters
Equipment Cleaning Operations	Resin and Gel Coat Application Equipment Cleaning Operations	2003	None
Carpet and Fabric Adhesive Operations	Application of Adhesives to Upholstery and Carpet	2003	None
Wood Shop/Plastic Prep	Cutting of Plastic and Wood	2003	Cyclone
Storage Tanks	Three 6,000 Gallon Tanks Used to Store Resin and Two Resin Recirculation Tanks	2003	Submerged Fill
Bilge Painting	Bilge Painting Operation	2003	None
Mold Maintenance	Mold Releases and Wax Agents Are Used to Maintain the Molds	2003	None
Foam Spraying	Foam Is Added For Floatation	2003	None
Caulking Operations	Caulking Materials For Various Applications.	2003	None

5.0 OVERALL SOURCE CONDITIONS

5.1 General Source Description

5.1.1 The source is a boat manufacturing plant. In addition, emissions will be controlled by filters or cyclones.

5.1.2 This source is located in an area that is in attainment of the National Ambient Air Quality Standards for all pollutants.

5.2 Major Source Status

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

5.3 General 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.

c. Pursuant to 35 IAC 237.102, no person shall cause or allow open burning, except the Illinois EPA may grant permits for open burning in accordance with 35 IAC 237.201.

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 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 regulations (see Condition 9.12.2).

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable regulations under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

5.3.6 Episode Action Plan

a. Pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures.

The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If 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.

5.4 General Non-Applicability of Regulations of Concern

General non-applicability of regulations of concern are not set for this source. However, there may be unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

5.5 General Source-Wide Control Requirements and Work Practices

General source-wide control requirements and work practices are not set for this source. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 General 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)	208.76
Sulfur Dioxide (SO_2)	----
Particulate Matter (PM)	20.89
Nitrogen Oxides (NO_x)	----
HAP, not included in VOM or PM	----
Total	229.65

5.6.2 Emissions of Hazardous Air Pollutants

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

5.6.3 Other Source-Wide Emission Limitations

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

5.7 General 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.

5.8 General Monitoring Requirements

General monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 General 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.

5.9.3 Retention and Availability of Records

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

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

5.10 General 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 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.11 General Operational Flexibility/Anticipated Operating Scenarios

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

5.12 General Compliance Procedures

5.12.1 General Procedures for Calculating Emissions

a. Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be based on 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 Unit: Fiberglass Boat Manufacturing Operations
Controls: Filters

7.1.1 Description

Fiberglass boats are built from glass fiber reinforcements laid in a mold and saturated with a polyester plastic resin. The resin hardens to form a rigid plastic part reinforced with the fiberglass. This plant will utilize the “open molding” process to manufacture boats. In open molding, fiberglass boats parts are built from the outside in. Emissions will be primarily styrene, which is both a volatile organic material and a hazardous air pollutant. Emissions of particulate matter will be controlled by filters or cyclones.

Gel Coat Operation

The smooth surface shell of the hull or deck for a boat is formed by spraying the liquid gel coat, which contains a catalyst, into a mold and allowing the gel coat to cure by polymerization and volatilization of excess monomer in the resin. The resin contains styrene or methyl methacrylate (MMA) monomer.

Lamination Operation

The lamination operation builds up hulls/decks to finished thickness and strength. This process consists of a non-atomized spray application of layer of liquid resin along with catalyst and glass fibers, to the exposed interior of the cured gel coat. Additional fiberglass material is embedded and rolled into each layer of sprayed material to add strength to the hull. Once the basic hull/deck has been laid up, stringers (typically made of wood) are added to give the desired rigidity. These stringers are laminated into the hull/deck and become an integral part of the structure.

Final Assembly Area Operations

Spray adhesives are used in upholstery subassembly and carpeting. Cleaning compounds are used in decorative detailing.

Mold Production/Mold Repair

The gel coat and lamination operations can also be used to produce molds. When making molds, similar processes are used except they occur on a wooden or clay mockup of the hull or deck.

Repairs to molds involve welding of frames, gel coat application and resin application.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Gel Coat Operations	Three Gel Coat Spray Booths Each Containing a Basecoat Color Gun, Backup Basecoat Color Gun and Six Color Gun	2003	Filters
Lamination Operations	Nine Laminating Areas	2003	Filters
Equipment Cleaning Operations	Resin and Gel Coat Application Equipment Cleaning Operations	2003	None

7.1.3 Applicable Provisions and Regulations

a. An “affected unit” for the purpose of these unit-specific conditions, is any of the operations described in Conditions 7.1.1 and 7.1.2.

b. The affected units are subject to National Emission Standards for Hazardous Air Pollutant Emissions: Boat Manufacturing, 40 CFR Part 63, Subparts A and VVVV. The Permittee must comply with all applicable requirements of 40 CFR Part 63, Subparts A and VVVV.

c. The affected units are subject to 35 IAC Part 215, Subpart K: Use of Organic Material, which provides that:

   No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission source, except as provided in following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material [35 IAC 215.301].

   Note: For gel coat and lamination operations, the emission source is the individual mold for a hull or deck.

d. The affected units are subject to 35 IAC 212.321, which provides that:

   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 35 IAC 212.321(b) or (c) [35 IAC 212.321 (a)].

7.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected units are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.1.5 Control Requirements and Work Practices

a. i. The emissions of PM from the gel coat and lamination operations shall be vented to filters at all times when the application equipment is in operation.

ii. The Permittee shall follow good operating practices and procedures for the spray application equipment filters including periodic inspections, routine maintenance, and prompt repair of defects.

iii. The Permittee shall maintain an adequate supply of replacement filters on the premises of the source.

b. The resin and gel coat application equipment cleaning operations are subject to 40 CFR 63.5734 which provides that:

i. Cleaning solvents used for routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, and squeegees), must contain no more than 5 percent organic HAP by weight. For removing cured resin or gel coat from application equipment, no organic HAP content limit applies.

ii. Organic HAP-containing solvents used for removing cured resin or gel coat must be stored in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR Part 63, Subpart T. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid.

c. Standards for Carpet and Fabric Adhesive Operations:

The carpet and fabric adhesive operations are subject to 40 CFR 63.5740 which provides that carpet and fabric adhesives used in this operation must contain no more than 5 percent organic HAP by weight.

d. The Permittee shall comply with the following applicable requirements for complying with the open molding emission limit specified in 40 CFR 63.5704.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected units are subject to the following:

a. The affected gel coat operation shall not exceed 65.0 tons per month and 383.0 tons a year of gel coat usage. 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 limit was established in Permit 03100052 [T1].

b. Pursuant to 40 CFR 63.5698(a), organic HAP emissions from the gel coat operations and lamination operations (which constitute open molding operations listed in 40 CFR 63.5698(a)(1) thru (a)(5) i.e., production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat) shall not exceed the following limit, based on a 12-month rolling average:

$$\text{HAP Limit} = [46(M_R)+159(M_{PG})+291(M_{CG})+54(M_{TR})+214(M_{TG})]$$

Where:

HAP Limit = Total allowable organic HAP that can be emitted from the operations, kilograms.

M_R = Mass of production resin used in the past 12 months, excluding any materials exempt under 40 CFR 63.5698(d), megagrams.

M_{PG} = Mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under 40 CFR 63.5698(d), megagrams.

M_{CG} = Mass of clear gel coat used in the past 12 months, excluding any materials exempt under 40 CFR 63.5698(d), megagrams.

M_{TR} = Mass of tooling resin used in the past 12 months, excluding any materials exempt under 40 CFR 63.5698(d), megagrams.

M_{TG} = Mass of tooling gel coat used in the past 12 months, excluding any materials exempt under 40 CFR 63.5698(d), megagrams.

c. Emissions from the gel coat and lamination operations shall not exceed the following limits. Compliance with the annual limit shall be determined from a running total of 12 months of data and by appropriate emission factors such as the Unified Emission Factors for Open Molding of Composites. This limit was established in Permit 03100052 [T1].

Pollutant	(Ton/Month)	(Ton/Year)
VOM	27.5	165.0

d. Emissions from the carpet and fabric adhesive operations and cleaning compounds emissions associated with those operations shall not exceed the following limits. Compliance with the annual limit shall be determined from a running total of 12 months of data. This limit was established in Permit 03100052 [T1].

Pollutant	(Ton/Month)	(Ton/Year)
VOM	2.3	13.37

i. The above limitations were established in Permit 03100052, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). 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 Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.1.7 Testing Requirements

The Permittee shall determine the organic HAP content and organic material emission rates of materials used in the affected units by the applicable methods described in 40 CFR 63.5758.

7.1.8 Monitoring Requirements

Monitoring of VOM/HAP content limits of Condition 7.1.5 may be achieved by either fulfilling testing requirements established in Condition 7.1.7 or by keeping the appropriate records in Condition 7.1.9.

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 units to demonstrate compliance with Conditions 5.6.1 and Condition 7.6.1, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall comply with the applicable recordkeeping requirements of 40 CFR 63.5767 and 40 CFR 63.5770 in addition to other applicable records specified in individual sections of 40 CFR Part 63, Subpart VVVV.

b. The Permittee shall maintain a file containing calculations for the maximum organic material emissions that could be emitted in any continuous one hour period for each affected unit subject to 35 IAC 215.301 (See also Condition 7.1.3(c)).

c. The Permittee shall maintain the following operating records:

   i. Gel coat usage (tons/month and tons/year);

   ii. The total usage of each VOM containing material associated with the affected units (tons/month and tons/year); and

   iii. VOM emissions from each affected unit as calculated by the emissions calculation procedure described in Condition 7.1.12, tons/month and tons/year (running 12 month total).

d. The Permittee shall maintain the following records to demonstrate good operating practices and procedures for the filters used in the gel coat and lamination operations:

   i. Records on periodic inspections of the filters with date, individual performing the inspection, and the nature of the inspection.

   ii. Records on prompt repair of identified defects (e.g., replacement of broken, or otherwise ineffective filters), with identification and description of defect, effect on emissions, date identified, date repaired (or replaced) and nature of corrective measure (repair or replacement).

e. The Permittee shall comply with the implementation plan requirements specified at 40 CFR 63.5707.

7.1.10 <u>Reporting Requirements</u>

a. i. The Permittee shall comply with the applicable notification requirements of 40 CFR 63.5761.

   ii. The Permittee shall comply with the applicable reporting requirements of 40 CFR 63.5764.

b. The Permittee shall promptly notify the Illinois EPA of deviations of an affected emission units with the permit requirements. Reports shall describe the probable cause of

such deviations, and any corrective actions or preventive measures taken.

c. i. If the records required by Condition 7.1.9(b) show that the maximum organic material emissions of an emission unit would exceed the limit in 35 IAC 215.301, the Permittee shall notify the Illinois EPA within 60 days. In this notification the Permittee shall identify the expected scope of exceedances, i.e., the types of molds and operating conditions under which exceedances could occur, and provide the Permittee's planned compliance program, e.g., changes in production rate, changes in material, or pursuing relief before the Pollution Control Board.

ii. Following submittal of this notification actual deviations from 35 IAC 215.301 that are generally by this notification may be reported in summary form on a semi-annual basis, along with progress on the compliance program.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected units. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.1.12 Compliance Procedures

a. Compliance with Condition 7.1.3(c) is addressed by the recordkeeping requirements of Condition 7.1.9.

b. Compliance with Condition 7.1.3(d) (35 IAC 212.321) is addressed by the operating requirements in Condition 7.1.5(a) and the recordkeeping requirements in Condition 7.1.9.

c. Compliance with Condition 7.1.5(b) is addressed by the compliance procedures required by Condition 7.1.3(b), i.e., 40 CFR 63.5737.

d. Compliance with Condition 7.1.5(c) is addressed by the compliance procedures required by 40 CFR 63.5740(b).

e. Pursuant to 40 CFR 63.5701, the Permittee shall comply with open molding emission limit by using the MACT model point value averaging (emissions averaging) option specified by 40 CFR 63.5701(a) and/or the compliant materials option specified by 40 CFR 63.5701(b).

f. Compliance with the emission limits in Condition 7.1.6(c) is addresses by the recordkeeping requirements in Condition 7.1.9.

g. Compliance with the emission limits in Condition 7.1.6(d) is addressed by the recordkeeping requirements in Condition 7.1.9 and a material balance calculation.

7.2 Unit: Wood Shop/Plastic Prep
Control: Cyclone

7.2.1 Description

The carpentry and plastic machining shop is used for the manufacturing of boat parts such as wooden stringers and plastic hatches. Emissions of particulates are controlled by a dust collection system (cyclone). The largest unit in the shop is the computerized router (CNC) which cuts parts out of multiple pieces of marine grade plywood in a single pass.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Wood Shop/Plastic Prep	Cutting of Plastic and Wood	Cyclone

7.2.3 Applicability Provisions and Applicable Regulations

a. The “affected units” for the purpose of these unit-specific conditions, is the carpentry and plastic machining shop operations described in Conditions 7.2.1 and 7.2.2.

b. The affected units are subject to 35 IAC 212.301 which states that 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 toward the zenith at a point beyond the property line of the source.

7.2.4 Non-Applicability of Regulations of Concern

a. Pursuant to 35 IAC 212.681, 35 IAC 212.321 does not apply to affected units that perform grinding, woodworking, sandblasting or shotblasting.

b. The affected units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Control Requirements and Work Practices

a. The emissions of PM from the affected units shall be vented to the cyclone at all times when the equipment is in operation.

b. The Permittee shall follow good operating practices and procedures for the cyclone, including periodic inspections, routine maintenance, and prompt repair of defects.

7.2.6 Production and Emission Limitations

a. Emissions from the affected units shall not exceed the following limits. Compliance with the annual limit shall be determined from a running total of 12 months of data. This limit was established in Permit 03100052 [T1].

Pollutant	(Lbs/Hour)	(Ton/Year)
PM	1.5	6.5

7.2.7 Testing Requirements

Testing requirements are not set for the affected units. However, there are general testing requirements in Conditions 5.7 and 8.5.

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected units. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected units:

a. The Permittee shall maintain a file containing calculations for the maximum particulate matter emissions that could be emitted in any continuous one hour period for the affected units (combined) with appropriate factors.

b. The following records to demonstrate good operating practices and procedures for the cyclone:

   i. Records for periodic inspection of the cyclone with date, individual performing the inspection, and the nature of the inspection.

   ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired and nature of repair.

c. PM emissions from the affected units with supporting calculations and documentation (tons/month and tons/year).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected units with the permit requirements. Reports shall describe the probable cause of such

deviations, and any corrective actions or preventive measures taken.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

a. Compliance with Condition 7.2.3(b) is addressed by meeting the operating requirements in Condition 7.2.5 and the recordkeeping requirements in Condition 7.2.9.

b. Compliance with the emission limits in Condition 7.2.6 is addressed by the recordkeeping requirements of Condition 7.2.9.

7.3 Unit: Storage Tanks
Control: None

7.3.1 Description

Three resin storage tanks and two resin recirculation tanks are operated at this facility.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Storage Tanks	Three 6,000 Gallon Tanks Used to Store Resin and Two Resin Recirculation Tanks	Submerged Fill

7.3.3 Applicability Provisions and Applicable Regulations

a. An "affected storage tank" for the purpose of these unit-specific conditions, is a storage tank described in Conditions 7.3.1 and 7.3.2.

b. Each affected storage tank is subject to 35 IAC 215.122 which provides that:

No person shall load any organic material into any stationary tank having a storage capacity of greater than 946 1 (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201 [35 IAC 215.122(b)].

Exception: If no odor nuisance exists this limitation shall only apply to the loading of volatile organic liquids with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) [35 IAC 215.122(c)].

7.3.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected storage tanks not being subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels, 40 CFR Part 60, Subpart Kb because each affected storage tank has a capacity less than 19,812 gallons.

b. This permit is issued based on the affected storage tanks not being subject to 35 IAC 215.121, because each affected storage tank has a capacity less than 40,000 gallons.

7.3.5 Control Requirements and Work Practices

Each affected storage tank shall be loaded with volatile organic liquids via a permanent submerged loading pipe or equivalent

device approved by the Illinois EPA (See also Condition 7.3.3(b)).

7.3.6 Production and Emission Limitations

This permit is issued based upon negligible emissions of volatile organic material from the affected storage tanks. For this purpose, emissions of VOM from all affected storage tanks shall not exceed 1.0 tons/year.

7.3.7 Testing Requirements

Testing requirements are not set for the affected units. However, there are general testing requirements in Conditions 5.7 and 8.5.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected units. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected storage tanks to demonstrate compliance with Condition 7.3.3:

a. Chemical name and CAS number of each material stored in the affected storage tanks.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA of deviations of an affected storage tank with the permit requirements. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

a. Compliance with Condition 7.3.3(b) (35 IAC 215.122) is assured as long as the Permittee meets the operating requirements of Condition 7.3.5.

b. Compliance with Condition 7.3.6 is addressed by the requirements of Condition 7.3.5 and the records required in Condition 7.1.9(a).

7.4 Unit: Miscellaneous Operations
Control: None

7.4.1 Description

Bilge Painting

In some cases, it is necessary to paint the bilge (the interior of the hull).

Mold Maintenance

The mold is prepared by waxing the surface (interior for hulls, exterior for decks) which allows the finished hull to release cleanly from the mold after lamination.

Foam Spraying

When the hull/deck is cured, it is removed from the mold. A two-part polyurethane foam is sprayed on parts of the hull interior and injected into hull compartments to provide floatation.

Water base and low VOM containing caulking materials are used for various applications.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Bilge Painting	Bilge Painting Operation	None
Mold Maintenance	Mold Releases and Wax Agents Are Used to Maintain the Molds	None
Foam Spraying	Foam Is Added For Floatation	None
Caulking Operations	Caulking Materials For Various Applications.	None

7.4.3 Applicability Provisions and Applicable Regulations

a. The “affected units” for the purpose of these unit-specific conditions, are the emission units described in Conditions 7.4.1 and 7.4.2.

b. The affected units are subject to 35 IAC 215 Subpart K, Use of Organic Material, which provides that:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission source, except as provided in the following exception: If no odor nuisance exists the limitation of this Condition shall apply only to photochemically reactive material [35 IAC 215.301].

c. The affected units are subject to 35 IAC 212.321(b)(1), which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced 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)].

7.4.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the bilge painting operation not being subject to 35 IAC Part 215, Subpart F: Coating Operations, because the bilge painting operation applies a coating to plastic parts.

7.4.5 Control Requirements and Work Practices

Control requirements are not set for the affected units. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be requirements for general source-wide control requirements set forth in Condition 5.5.

7.4.6 Production and Emission Limitations

a. Operation of the bilge painting operation including solvents used for cleanup shall not exceed the following usage limitations: 2.2 tons VOM/month and 13.17 tons VOM/year.

b. Emissions from the bilge painting operation including cleanup shall not exceed the following limits. Compliance with the annual limit shall be determined from a running total of 12 months of data. This limit was established in Permit 03100052 [T1].

Pollutant	(Ton/Month)	(Ton/Year)
VOM	2.2	13.17

c. Emissions from the mold maintenance operations shall not exceed the following limits. Compliance with the annual limit shall be determined from a running total of 12 months of data. This limit was established in Permit 03100052 [T1].

Pollutant	(Ton/Month)	(Ton/Year)
VOM	1.1	6.13

d. This permit is issued based upon negligible emissions of volatile organic material from the caulking operations and the foam spraying operations. For this purpose, emissions from each operation shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

7.4.7 Testing Requirements

a. The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Illinois EPA proof that the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results. Any alternate 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 will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative [35 IAC 215.208(a)].

b. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the affected bilge painting operation shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected bilge painting operation shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.105.

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee’s records pursuant to Condition 1.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.

7.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected units. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected units:

a. Usage of each material associated with the affected emission units (gallons or pounds/month and gallons or pounds/year);

b. VOM and HAP content of each material used (lb/gallon, less water);

c. VOM emissions from each affected emission unit (tons/month and tons/year);

d. HAP emissions from each affected emission unit (tons/month and tons/year); and

e. A file containing calculations for the maximum emissions of VOM that could be emitted in any continuous one hour period for each emission unit subject to Condition 7.4.3(b).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA of deviations of the affected units with the permit requirements. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

a. Compliance with Condition 7.4.3(b) is addressed by the recordkeeping requirements of Condition 7.4.9.

b. Compliance with Conditions 7.4.6(b) and 7.4.6(c) is addressed by the recordkeeping requirements of Condition 7.4.9 and a material balance calculation.

c. Compliance with Condition 7.4.3(c) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected emission units.

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 June 23, 2005 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

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

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

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

i. Describe the physical or operational change;

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

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

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

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

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods 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]:

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

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

8.6.2 Test Notifications

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

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

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

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

d. The specific 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
2009 Mall Street
Collinsville, Illinois 62234

iv. USEPA Region 5 - Air Branch

USEPA (A - 18J)
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 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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 statement 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):

	Metric	English
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):

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

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):

	Metric	English
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):

	Metric	English
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		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
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

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

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

KKD:psj