

Attention:

Nascote Industries, Inc.
Attn: Denis Grell, Environmental Engineer
18310 Enterprise Avenue
Nashville, Illinois 62263

State of Illinois

CLEAN AIR ACT PERMIT
PROGRAM (CAAPP) PERMIT

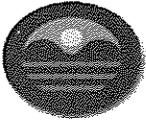
Source:

Nascote Industries, Inc.
18310 Enterprise Avenue
Nashville, Illinois 62263

I.D. No.: 189801AAA
Permit No.: 95070058

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application: Renewal
Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 189801AAA
Permit No.: 95070058
Statement of Basis No.: 95070058-2014/04

Date Application Received: November 9, 2006
Date Issued: December 29, 2014

Expiration Date: December 29, 2019
Renewal Submittal Date: 9 Months Prior to Expiration Date

Source Name: Nascote Industries, Inc.
Address: 18310 Enterprise Avenue
City: Nashville
County: Washington
ZIP Code: 62263

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:AB:jws

cc: IEPA, Permit Section
IEPA, FOS, Region 3
Lotus Notes Database

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Section 1 - Source Information

1. Addresses

| <u>Source</u> | <u>Owner</u> |
|--|---|
| Nascote Industries, Inc. 18310 Enterprise Avenue Nashville, Illinois 62263 | Magna International, Inc. 50 Casmir Court Concord, Ontario L4K455 |
| <u>Operator</u> | <u>Permittee</u> |
| Nascote Industries, Inc 18310 Enterprise Avenue Nashville, Illinois 62263 | The Operator of the source as identified in this table. |

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

| | <u>Name</u> | <u>Title</u> |
|-----------------------------|---------------|-----------------|
| <i>Responsible Official</i> | Mark Rudofski | General Manager |
| <i>Delegated Authority</i> | N/A | N/A |

Other Contacts

| | <u>Name</u> | <u>Phone No.</u> | <u>Email</u> |
|--------------------------|-------------|-------------------------|-----------------------|
| <i>Source Contact</i> | Denis Grell | 618/327-4381 Ext.522 | Denis.Grell@magna.com |
| <i>Technical Contact</i> | Denis Grell | 618/327-4381 Ext.522 | Denis.Grell@magna.com |
| <i>Correspondence</i> | Denis Grell | 618/327-4381 Ext.522 | Denis.Grell@magna.com |
| <i>Billing</i> | Denis Grell | 618/327-4381 Ext.522 | Denis.Grell@magna.com |

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

| <u>I.D. No.</u> | <u>Permit No.</u> | <u>Single Source Name and Address</u> |
|-----------------|-------------------|---|
| 189030AAZ | 14080010 | Innertech-Nashville 18355 Enterprise Avenue Nashville, Illinois 62263 |

Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 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.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve

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the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source 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]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source 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]

c. Duty to Maintain Equipment

The source 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. [Section 39.5(7)(a) of the Act]

d. 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. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA 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]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 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. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this 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 source 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]

4. Testing

- a. 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 IEPA shall

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be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, 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:
- i. **Testing by Owner or Operator:** The IEPA 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 IEPA, at such reasonable times as may be specified by the IEPA 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 IEPA shall have the right to observe all aspects of such tests.
 - ii. **Testing by the IEPA:** The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, 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.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, 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 maintenance was performed and the nature of preventative maintenance activities.

b. Retention of Records

- i. 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]
- ii. Pursuant to Section 39.5(7)(a) of the Act, 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 different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee

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shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. 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.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source 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 in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source 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 IEPA, 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 November 12, 2014 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, 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.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way

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affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. 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 source for a permit modification, revocation and reissuance, or termination, or of

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a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA 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 source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. 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]

11. Permit Renewal

- a. 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 the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item

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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.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, 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 unless the wind speed is greater than 25 mph.

ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

c. Asbestos Demolition and Renovation

- i. **Asbestos Fees.** Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or

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demolish pursuant to Condition 3.1(d)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.

- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

d. NESHAP Standards (40 CFR 63 Subpart DDDDD)

Pursuant to 40 CFR 63 Subpart DDDDD Table 3 Condition 4, no later than January 31, 2016, the source shall conduct a one-time energy assessment performed by a qualified energy assessor. This energy assessment shall include the following procedures:

- i. A visual inspection of each boiler system.
- ii. An evaluation of operating characteristics of each boiler system, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
- iii. An inventory of major energy use systems consuming energy from affected boilers.
- iv. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
- v. A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified.
- vi. A list of cost-effective energy conservation measures that are within the facility's control.
- vii. A list of the energy savings potential of the energy conservation measures identified.
- viii. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

e. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee 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 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

Nascote Industries
 I.D. No.: 189801AAA
 Permit No.: 95070058

Date Received: 11-09-06
 Date Issued: 12-29-14

a. Fugitive PM Operating Program

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7) (a) of the Act.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7) (a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on November 4, 2014, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. 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 Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date

provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

- a. i. Construction Permits #89070026, 93050126, and 93110078 Requirements [T1]
- A. Pursuant to Construction Permits 89070026, 93050126, and 93110078, total source-wide VOM emissions shall not exceed the 322.3 tons/yr. [T1]
- ii. Compliance Method (Construction Permits)
- Monitoring
- A. Pursuant to Construction Permits 89070026, 93050126, and 93110078, 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).
- Recordkeeping
- B. Pursuant to 39.5(7)(b) of the Act, the Permittee shall keep monthly and annual records of source-wide VOM emissions, with supporting calculations, based on the records for individual operations described in Section 4.

4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

- a. Prompt Reporting
- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
- I. Requirements in Condition 3.1(a).
- II. Requirements in Conditions 3.3(a).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.

- C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

| <u>Monitoring Period</u> | <u>Report Due Date</u> |
|--------------------------|------------------------|
| January through June | July 31 |
| July through December | January 31 |

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Plastic Parts Coating Lines and Associated Equipment

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|--|-----------------------------------|-----------------------------------|--|--|-------------------------------------|
| <u>Color Line</u> | | | | | |
| Paint Booths P1 (A) - P1 (E) | PM, VOM, HAP | 1986 | 2006 | Salem RTO/RCO | Temperature Gauge; Pressure Sensors |
| Bake Oven P3 | SO ₂ , VOM, HAP | 1986 | N/A | Durr Oxidizer | Temperature Gauge; Pressure Sensors |
| <u>Prime Line</u> | | | | | |
| Paint Booths P4 (A) - P4 (H) | PM, VOM, HAP | 1986 | 2006 | Salem RTO/RCO | Temperature Gauge; Pressure Sensors |
| Bake Oven P5 | SO ₂ , VOM, HAP | 1986 | N/A | Durr Oxidizer | Temperature Gauge; Pressure Sensors |
| Prime Flash-Off North & South P4 (I) - P4 (J) | PM, VOM, HAP | 1986 | N/A | None | N/A |
| <u>Spray Test Booths</u> | | | | | |
| Three Booths (P13B, C, and D) | PM, VOM, HAP | 1999 | N/A | Filter | N/A |
| <u>Paint Mixing Operations</u> | | | | | |
| Prime Line Doghouse North (P7A) and South (P7B) | VOM, HAP | 1986 | N/A | None | N/A |
| Paint Kitchen (P12) | VOM, HAP | 1999 | N/A | None | N/A |
| <u>Used Solvent Storage</u> | | | | | |
| One virgin purge solvent storage tank and one spent purge solvent storage tank | VOM, HAP | 2006 | N/A | None | N/A |

2. Applicable Requirements

For the emission units in Condition 4.1(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7) (a), 39.5(7) (b), and 39.5(7) (d) of the Act.

a. i. Opacity Requirements

- A. 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 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, the Permittee shall perform visible emission observations from each individual stack or exhaust of control device associated with the coating lines in accordance with Method 22 on at least semi-annual basis. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the operation, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each visible emission observation and opacity reading performed in accordance with Condition 4.1.2(a)(ii)(A). These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit for 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, which, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c) (See Condition 7.2).

ii. Compliance Method (PM Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of PM emissions from each coating or group of coating operations, with supporting documentation and calculations.

c. i. Volatile Organic Material Requirements (VOM)

- A. The following VOM emission limits are applied for the paint booth operations, pursuant to 35 IAC 215.301 and 215.302:

I. Uncontrolled Emissions

No person shall 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 this limitation shall apply only to photochemically reactive material.

II. Emissions controlled by Catalytic or Thermal Oxidizers

Emissions of organic material in excess of those permitted by 35 IAC 215.301 are allowable if such emissions are controlled by thermal or catalytic incineration, so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide or water.

- B. Pursuant to Construction Permit #89070026, daily emissions from the coating operations shall not exceed the following limits: [T1]
 - I. Color Line: 1,000.00 lbs/day;
 - II. Prime Line: 450.0 lbs/day; and
 - III. Touchup Painting: 7.1 lbs/day.
- C. Pursuant to Construction Permit #89070026, daily emissions from the solvent/purge cleanup on the Color Line 1 shall not exceed 90.0 lbs/day. [T1]
- D. Pursuant to Construction Permit #99020009, total VOM emissions from the spray test booths (from paint and purge solvent) shall not exceed the following limits [T1]: 0.89 ton/mo and 5.33 ton/yr.

ii. Compliance Method (VOM Requirements)

Monitoring

- A. Compliance with annual limits shall be determined by adding data from the present month to the data for the preceding 11 months (total 12 months of data). [T1]
- B. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the coating operations using control are subject to 40 CFR Part 64 for PM emissions. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Section 7.4 and Table 7.4.1 of this permit. At all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep daily, monthly and annual records of VOM emissions, total and separately from the individual coating operations, with supporting documentation and calculations (e.g., VOM content, coating and solvent usage, amount of manifested waste collected, etc.).

d. i. Hazardous Air Pollutants Requirements (HAP)

- A. Pursuant to 40 CFR 63.4490(b)(3), and 63.4561(a), for the Color and Prime Lines controlled by oxidizers and the Test Spray Booths, the Permittee shall not exceed 0.26 kg (0.26 lb) of organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period by using an add-on controls option described in 40 CFR 63.4491(c).

ii. Compliance Method (HAP Requirements)

Monitoring

- A. Pursuant to 40 CFR 63.4491, the Permittee must include all coatings (as defined in 40 CFR 63.4581), thinners and/or other additives, and cleaning materials used in the operations when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4490(b)(3).

Recordkeeping

- B. Pursuant to 40 CFR 63.4530(a), the Permittee shall keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart PPPP and documentation each notification and report.
- C. Pursuant to 40 CFR 63.4530(c)(4), the Permittee shall keep the following records:
- i. The calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of 40 CFR 63.4551; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4551(e)(4);
 - ii. The calculation of the total mass of coating solids used each month using Equation 2 of 40 CFR 63.4551;
 - iii. The calculation of the mass of organic HAP emission reduction by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of 40 CFR 63.4561 and Equations 2, 3, and 3A through 3C of 40 CFR 63.4561, as applicable;
 - iv. The calculation of each month's organic HAP emission rate using Equation 4 of 40 CFR 63.4561; and
 - v. The calculation of each 12-month organic HAP emission rate using Equation 5 of 40 CFR 63.4561.
- D. Pursuant to 40 CFR 63.4530(d), the Permittee shall keep a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
- E. Pursuant to 40 CFR 63.4530(e), the Permittee shall keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
- F. Pursuant to 40 CFR 63.4530(f), the Permittee shall keep a record of the mass fraction of coating solids for each coating used during each compliance period.
- G. Pursuant to 40 CFR 63.4531(b) and (c), the Permittee shall keep the records required by this permit and Subpart PPPP for 5 years (2 years on-site and 3 remaining years off-site) following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

e. i. Sulfur Dioxide Requirements (SO₂)

- A. Pursuant to 35 IAC 214.301, for each bake oven, no person shall cause or allow the emission of sulfur dioxide into the atmosphere to exceed 2,000 ppm.

ii. Compliance Method (SO₂ Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall use pipeline quality natural gas with the sulfur content not exceeding 2000 ppm.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to pipeline quality natural gas:
- I. Annual certification that only pipeline quality natural gas is used.

f. i. Control and Work Practice Requirements

- A. Pursuant to 40 CFR 63.4492(b), for any controlled coating operation(s) on which the emission rate with add-on controls option is used, the Permittee shall meet the operating limits specified in Table 1 to 40 CFR 63 Subpart PPPP. These operating limits apply to the emission capture and control systems on the coating operation(s), and the Permittee shall establish the operating limits during the performance test according to the requirements in 40 CFR 63.4567. The Permittee shall meet the operating limits at all times after they had been established.
- B. Pursuant to 40 CFR 63.4492(b) and Table 1 of Subpart PPPP, the Permittee shall comply with the following operating limits for oxidizers and emission capture system:
- I. Thermal Oxidizer:
1. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.4567(a).
- II. Catalytic Oxidizer:
1. The average temperature measured just before the catalyst bed in any 3-hour period must not fall below the limit established according to 40 CFR 63.4567(b); and either
 2. Ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according to 40 CFR 63.4567(b)(2); or
 3. Develop or implement an inspection and maintenance plan according to 40 CFR 63.4567(b)(4).
- III. Capture System (PTE):
1. The direction of the air flow at all times must be into the enclosure; and either
 2. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or

3. The pressure drop across enclosure must be at least 0.007 inch H₂O, as established in Method 204 of Appendix M to 40 CFR Part 51.

IV. Capture System (not a PTE):

1. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.4567(f).

C. Pursuant to 40 CFR 63.4500(a)(2), any coating operation(s) shall be in compliance with the emission limitations as follows:

- I. The coating operation(s) must be in compliance with the applicable emission limit in 40 CFR 63.4490 at all times except during periods of startup, shutdown, and malfunction.
- II. The coating operation(s) must be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.4492 at all times except during periods of startup, shutdown, and malfunction.
- III. The coating operation(s) must be in compliance with the work practice standards in 40 CFR 63.4493 at all times.

D. Pursuant to 40 CFR 63.4500(c), the Permittee shall develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

E. Work Practice Standards [40 CFR 63.4493]

- I. For the emission rate with add-on controls option, the Permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented.
 1. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.
 2. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.
 3. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

4. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
 5. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.
- F. Pursuant to Section 39.5(7)(a), each paint booth and thermal/catalytic oxidizer shall be operated as follows:
- I. Natural gas shall be the only fuel in use;
 - II. An oxidizer shall be in operation at all times that the associated paint booth(s) is in operation and emitting VOM, except the time when a routine maintenance of an oxidizer is performed or a natural gas emergency occurred.
 - III. An oxidizer shall not be seasonally shut down as would be allowed in 35 IAC 215.106.
 - IV. The afterburner combustion chamber of the RTO/RCO shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F when operating as an RTO (1200°F for DURR oxidizer) and 1000°F when operating as an RCO, before the coating operation is begun, and this temperature shall be maintained during operation of the affected paint booth.
 - V. The Permittee shall follow good operating practices for the oxidizers and filters, including periodic maintenance and repair of defects.

ii. Compliance Method (Control and Work Practice Requirements)

Monitoring

Pursuant to 40 CFR 63.4567, during the performance test required by 40 CFR 63 Subpart PPPP and this permit, the Permittee shall establish the operating limits required by 40 CFR 63.4492 as follows. After the operating limits have been established, the Permittee shall follow requirements of 40 CFR 63.4568(a), (b), (c), and (g) for continuous parameter monitoring system installation, operation, and maintenance.

A. Thermal Oxidizer

- I. During the performance test, the Permittee shall monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The Permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
- II. Use the data collected during performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.

B. Catalytic Oxidizer

- I. During the performance test, the Permittee shall monitor and record the temperature just before the catalyst bed and the temperature difference across the catalyst bed at least once every 15 minutes during each of the three test runs.

- II. Use the data collected during the performance test to calculate and record the average temperature just before the catalyst bed and the average temperature difference across the catalyst bed maintained during the performance test. These are the minimum operating limits for the catalytic oxidizer.
- III. The Permittee shall monitor the temperature at the inlet to the catalyst bed and implement a site-specific inspection and maintenance plan for the catalytic oxidizer as specified further. During the performance test, the Permittee shall monitor and record the temperature just before the catalyst bed at least once every 15 minutes during each of the three test runs. Use the data collected during the performance test to calculate and record the average temperature just before the catalyst bed during the performance test. This is the minimum operating limit for the catalytic oxidizer.
- IV. The Permittee shall develop and implement an inspection and maintenance plan for the catalytic oxidizer(s) for which the Permittee elects to monitor according to 40 CFR 63.4567(b)(3). The plan shall address, at a minimum, the following elements:
 - 1. Annual sampling and analysis of the catalyst activity (i.e., conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures. If problems are found during the catalyst activity test, the Permittee shall replace the catalyst bed or take other corrective action consistent with the manufacturer's recommendations.
 - 2. Monthly external inspection of the catalytic oxidizer system, including the burner assembly and fuel supply lines for problems and, as necessary, adjust the equipment to assure proper air-to-fuel mixtures.
 - 3. Annual internal inspection of the catalyst bed to check for channeling, abrasion, and settling. If problems are found during the annual internal inspection of the catalyst, the Permittee shall replace the catalyst bed or take other corrective action consistent with the manufacturer's recommendations. If the catalyst bed is replaced and is not of like or better kind and quality as the old catalyst then the Permittee shall must conduct a new performance test to determine destruction efficiency according to 40 CFR 63.4566. If a catalyst bed is replaced and the replacement catalyst is of like or better kind and quality as the old catalyst, then a new performance test to determine destruction efficiency is not required and the Permittee may continue to use the previously established operating limits for that catalytic oxidizer.

C. Emission Capture Systems

- I. For each capture device that is not part of a PTE that meets the criteria of 40 CFR 63.4565(a), establish an operating limit for either the gas volumetric flow rate or duct static pressure, as specified further. The operating limit for a PTE is specified in Table 1 to Subpart PPPP.
 - 1. During the capture efficiency determination required by 40 CFR 63.4560 and described in 40 CFR 63.4564 and 63.4565, the Permittee shall monitor and record either the gas volumetric flow rate or the duct static pressure for each separate capture device in the emission capture system at least once every 15

minutes during each of the three test runs at a point in the duct between the capture device and the add-on control device inlet.

2. Calculate and record the average gas volumetric flow rate or duct static pressure for the three test runs for each capture device. This average gas volumetric flow rate or duct static pressure is the minimum operating limit for that specific capture device.

Testing

- D. Pursuant to Section 39.5(7)(c) of the Act, within five years after issuance of this permit, the Permittee shall conduct the tests of the destruction efficiency of the control devices (thermal oxidizer and catalytic oxidizer) and capture system efficiency in accordance with the following requirements:
 - I. Pursuant to 40 CFR 63.4564(a)(1), tests shall be conducted under the representative coating operating conditions.
 - II. Pursuant to 40 CFR 63.4564(a)(2), tests shall be conducted under the representative emission capture system and add-on control device operating conditions.
 - III. Pursuant to 40 CFR 63.4565, capture system efficiency tests shall be conducted in accordance with Method 204 and/or its different versions.
 - IV. Pursuant to 40 CFR 63.4566, control device emission destruction efficiency tests shall be conducted in accordance with Method 25 or 25A and other methods identified in 40 CFR 63.4566(a).
- E. The Permittee shall comply with all the requirements of Section 7.1.

Recordkeeping

- F. Pursuant to 40 CFR 63.4530(i), the Permittee shall keep the following records:
 - I. For each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction.
 - II. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
 - III. The records required to show continuous compliance with each operating limit specified in Table 1 to Subpart PPPP that applies to the Permittee.
 - IV. For each capture system that is a PTE, the data and documentation the Permittee uses to support a determination that the capture system meets the criteria in Method 204 of Appendix M to 40 CFR Part 51 for a PTE and has a capture efficiency of 100 percent, as specified in 40 CFR 63.4565(a).
 - V. For each capture system that is not a PTE, the data and documentation the Permittee uses to determine capture efficiency according to the requirements specified in 40 CFR 63.4564 and 63.4565(b) through (e), including the records specified in 40 CFR 63.4530(i)(5)(i) through (iii) of this section that apply to Permittee.

- VI. The following records for each add-on control device organic HAP destruction or removal efficiency determination as specified in 40 CFR 63.4566:
1. Records of each add-on control device performance test conducted according to 40 CFR 63.4564 and 63.4566.
 2. Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.
- VII. Records of the data and calculations used to establish the emission capture and add-on control device operating limits as specified in 40 CFR 63.4567 and to document compliance with the operating limits as specified in Table 1 to subpart PPPP.
- VIII. A record of the work practice plan required by 40 CFR 63.4493 and documentation that the Permittee is implementing the plan on a continuous basis.

3. Non-Applicability Determinations

- a. Paint booths are not subject to 35 IAC Part 215, Subpart F "Coating Operations", because an automotive plastic parts coating operations are not regulated by Subpart F.

4. Other Requirements

a. i. Title I Requirements (Construction Permit 89070026) [T1]

The following conditions represent the application of the Best Available Control Technology (BACT) required by the construction permit:

- A. The prime line and color line shall be operated so that the flow of air through any natural draft openings on the line which are normally open is into the line and essentially all discharge of air to the atmosphere occurs through forced draft openings.
- B. I. Afterburners shall be operated and maintained to control the exhaust(s) from the ovens on the color and prime line.
- II. These afterburners shall be operated and maintained to reduce the outlet concentration of VOC to no more than 10 ppm or 10% of the inlet concentration, whichever is greater.
- iii. These afterburners shall be operated whenever the respective line is in operation.
- C. I. An afterburner system shall be operated and maintained to control stacks 2, 3, 4 and 5 of the color line (spray booth 2 through 5 exhausts) and stacks 1 and 2 of the prime line (spray booth 1 and 2 exhausts).
- II. 1. Stack 1 of the Color Line (Prep Spray Booth Exhaust) shall also be controlled by this afterburner system if uncontrolled emissions of VOC would exceed 54 tons/year. Compliance with this limit shall be determined based on compliance with enforceable limitations on type and amount of coating used in this booth and amount of purge solvent used and recovery practices, as established elsewhere by federally enforceable permit conditions.

2. An individual flash tunnel stack of the color line and prime line shall also be controlled by the afterburner system if emissions of VOC from the associated Flash Tunnel exceed 6.3 tons/year. Compliance with this limit shall be determined from representative values for distribution of VOC emissions and operating records for use of VOC containing material on a line. The values for the relationship between VOC applied in different booths to the flash tunnel exhaust itself shall be determined from representative measurements conducted pursuant to testing condition of this permit. The values for use of VOC containing material shall be based on operating records for VOC applied in coatings and use of purge which is not recovered.
 3. If Stack 1 or a flash tunnel stack is controlled by the afterburner, the stack shall continue to be so controlled even if the VOC emissions fall below the above applicability criteria.
- III. This afterburner system shall be operated and maintained to reduce the outlet concentration of VOC to no more than 10 ppm or 5% of the inlet concentration, whichever is greater. Compliance with this requirement shall be determined by testing and monitoring requirements in accordance with conditions of this permit.
- IV. This afterburner system shall be operated whenever a line is in operation, except as provided in paragraph (d) and (e) below.
- D. I. If routine preventative maintenance of the afterburner system cannot be completed during a period when the coating lines are idle, as scheduled, the afterburner system need not be operated, to the extent necessary to perform such maintenance.
- II. During a malfunction of the afterburner, as defined at 40 CFR 60.2, the afterburner system need not be operated.
- III. If the total time during which the afterburner does not operate, as addressed above, exceeds 5 days in any calendar year, a detailed evaluation of the condition of the afterburner system and maintenance practices shall be performed and a written report submitted to the Illinois EPA.
- E. I. If operation of the afterburner system would contribute to, cause or seriously threaten the occurrence of a natural gas emergency for the City of Nashville, the afterburner system need not be operated to the extent reasonably possible, to prevent such an emergency. The existence of such an emergency condition shall be declared by the natural gas supplier, e.g., the City of Nashville, who shall describe the emergency and inform the Permittee of the beginning and end of the emergency as it affects the Permittee.
- II. Prior to renewing or revising its natural gas supply agreement, the Permittee shall require a description of the likely circumstances that would lead to a natural gas emergency, the causes for such circumstances, and detailed evidence that reasonable measures to prevent such circumstances have been taken. The agreement shall address the conditions and circumstances under which the gas supplier may declare a fuel emergency.
- III. The Permittee shall keep records of its activities pursuant to paragraphs (E)(i) and (ii), above.

- IV. If the afterburner is not fully operational, as addressed above, on more than 5 days in any calendar year, or during a day when the average ambient temperature exceeds 20°F a detailed written report shall be submitted to the Illinois EPA by the Permittee. This report shall indicate whether the emergency was a consequence of circumstances for which reasonable action can be taken to prevent reoccurrence and by whom such action can be taken.
- F. At all times, including periods of preventative maintenance, malfunction, and natural gas emergency the afterburner system and associated coating lines shall, to the extent practical, be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.
- G. I. As an alternative to the limits in Condition C(ii), the Permittee may comply with the following limits. Compliance with these limits shall be determined on a daily-weighted average basis for each coating line.
- Prime - 14.5 lb VOC/gallon applied coating solids
- Topcoat - 13.5 lb VOC/gallon applied coating solids
- II. For the purpose of this condition transfer efficiency shall be determined by actual measurements at the plant using the methods and procedures specified in USEPA's "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of an Automobile and Light-Duty Truck Topcoat Operations", December 1988, or other comparable methodology approved by the Illinois EPA.
- III. The Permittee shall notify the Illinois EPA in writing one year in advance of operation with the intent to comply with this condition. Prior to initiating operation pursuant to this condition the Permittee shall obtain appropriate new or revised permits from the Illinois EPA.
- H. I. The volatile organic compound emissions from purging of color line coating applicators (excluding the prep booth) and from the color line purge solvents collection system shall be controlled by the color line and prime line afterburner.
- II. The volatile organic compound emissions from purging of prime coating applicators and use of solvent for clean up operations shall be controlled by at least 70% from uncontrolled levels by collection, closed storage and recycle or offsite disposal of solvent. For the purpose of this requirement "use of solvent for clean up operations" includes use of pure solvent in degreasers and other cleaning operations. Compliance with this requirement shall be determined from the overall recovery of purge and cleanup solvent at the plant on a monthly basis, provided that the recovery equipment and practices in uncontrolled areas of the coating lines are equal to or better than those in controlled areas of the coating lines.
- I. I. Commercially produced parts which proceed from production and storage to the coating line within typical schedules shall not be cleaned or wiped prior to coating, other than those parts designated as rework, using any liquid which contains more than 1% VOC by weight.
- II. Parts which are stored for a typical amounts of time prior to coating or parts which are being evaluated prior to commercial production, may be wiped prior to coating using a liquid which contains more than 1% VOC by weight. The emissions of VOC from such wiping shall not exceed

8 lb/hour. Compliance with this limit shall be determined from the VOC content of the wiping agent used.

- J. I. Parts that are required to be cleaned, reworked and repainted may be wiped and cleaned with either isopropyl alcohol or naphtha solvent prior to repainting.
- II. Emissions from rework parts wiping and cleaning process shall not exceed 8 lbs/hr.
- III. The usage of solvent in the rework parts wiping and cleaning process shall not exceed 10716 gallons per year.
- IV. This condition establishes enforceable limitations on the rework parts wiping and cleaning process which restrict annual emissions to less than 35.20 tons per year.
- K. I. High pressure water sprays or other processes not resulting in VOC emissions shall be used for cleaning conveyor lines.
- II. For storage, handling and processing of coating in and associated with the paint mix room and for the purge solvent and purged material system located outside the coating line, the requirements of 35 Ill. Adm. Code, Part 215 Section 215.624 - Covers, 215.628 - Leaks, and 215.630 Clean up, as in effect on December 31, 1990, shall be followed to minimize VOC emission. It should be noted, that after the issuance of the initial PSD permit approval 89070026 on October 30, 1991, substantial modifications being performed in operations of the purge solvent storage by adding total enclosure and the regenerative thermal oxidizer as an air emission control device. All these improvements allow to achieve much better air emissions control and application of more advanced BACT requirements in comparison with initial PSD condition shown above.
- III. Covers shall be installed on the trenches and pits of the waterwash/paint sludge system, i.e., the ESKA system. These covers shall be in place except when inspection or maintenance require access. These covers shall completely cover the opening, except as necessary to provide safe clearance for gauging systems, rotating shafts or other features of the system. These covers shall maintain contact with the rim of the opening or adjacent cover, for at least 90% of the perimeter distance.
- L. The adhesive used in assembling plastic parts shall not emit more than 3 lbs of volatile organic compounds per 100 lbs of adhesive.
- M. I. Emissions of carbon monoxide from afterburners shall not exceed 20 ppm.
- II. Emissions of nitrogen oxides from afterburners shall not exceed 0.11 lb per million Btu heat input, with heat input based on fuel input to the afterburner.
- III. Emissions of nitrogen oxides and carbon monoxide from fuel combustion, as they are not addressed above, shall be limited by use of natural gas, propane, or liquefied petroleum gas, as the only commercial fuels.

ii. Compliance Method (Construction Permit 89070026)

- A. Compliance with BACT requirements to the oxidizers/afterburners is achieved through implementation of requirements of 40 CFR Part 63 Subpart PPPP and the implementation of appropriate testing, monitoring, recordkeeping requirements established by this permit.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.1(2)(a), 4.1(2)(b), 4.1(2)(c), 4.1(2)(d), 4.1(2)(e), 4.1(2)(f) and 4.1(2)(g).
- II. Requirements in Conditions 4.1(4).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

b. Federal Reporting and Notification

- i. Pursuant to 40 CFR 63.4520, semiannual compliance reports shall be submitted to the Compliance Section no later than July 31 or January 31 following the end of the semiannual compliance period and according to the requirements of 40 CFR 63.4520(a)(1) through (7). The semiannual compliance reports shall be combined with the semiannual monitoring reports required by this permit.
- ii. *Startup, shutdown, malfunction reports.* Pursuant to 40 CFR 63.4520(c), if the Permittee had a startup, shutdown, or malfunction during the semiannual reporting period, the Permittee shall submit the following reports:
- A. If the Permittee's actions were consistent with a developed startup, shutdown, and malfunction plan, the Permittee shall include the information specified in 40 CFR 63.10(d) in the semiannual compliance report.
- B. If the Permittee's actions were not consistent with a developed startup, shutdown, and malfunction plan, the Permittee shall submit an immediate startup, shutdown, and malfunction report as described as follows:

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Section 4 - Emission Unit Requirements
4.1 - Plastic Parts Coating Operations

- I. The Permittee shall describe the actions taken during the event in a report delivered by facsimile, telephone, or other means to the IEPA Regional Field Office within 2 working days after starting actions that are inconsistent with the plan.
- II. The Permittee shall submit a letter to the IEPA Compliance Section and USEPA within 7 working days after the end of the event, unless you have made alternative arrangements with the IEPA and/or USEPA as specified in 40 CFR 63.10(d)(5)(ii). The letter must contain the information specified in 40 CFR 63.10(d)(5)(ii).

4.2 Fuel Combustion Emission Units

1. Emission Units and Operations

| <i>Emission Units</i> | <i>Pollutants Being Regulated</i> | <i>Original Construction Date</i> | <i>Modification/ Reconstruction Date</i> | <i>Air Pollution Control Devices or Measures</i> | <i>Monitoring Devices</i> |
|---|-----------------------------------|-----------------------------------|--|--|---------------------------|
| Air Supply House | | | | | |
| Color Line Ash #3 - #7 (all units with cumulative heat input equal to 45.56 mmBtu/hr) | CO | 1986 | 2004 | None | N/A |
| Prime Line Ash #1 (19.25 mmBtu/hr) | CO | 1986 | N/A | None | N/A |
| Prime Line Ash #2 (19.25 mmBtu/hr) | CO | 1986 | N/A | None | N/A |
| Two Space Heaters (5.43 mmBtu/hr heat input each) | N/A | 1998 | N/A | None | N/A |
| Eclipse Ratiomatic Heater (5.0 mmBtu/hr heat input) | N/A | | N/A | None | N/A |
| Hot Water Units | | | | | |
| Color Line Boiler and Prime Line Boiler (8.4 mmBtu/hr heat input each) | N/A | 1986 | N/A | None | N/A |
| Color Line Boiler for Paint Utilities (8.0 mmBtu/hr heat input) | N/A | 2004 | N/A | None | N/A |
| Plant-Wide Make-up Air Units | | | | | |
| LUWA #1 and #2 (9.0 mmBtu/hr heat input each) | N/A | 2004 | N/A | None | N/A |

2. Applicable Requirements

For the emission units in Condition 4.2(1) above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. 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 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, the Permittee shall perform visible emission observations from each individual stack(s) associated with the boilers/fuel combustion units in accordance with Method 22 on at least annual basis. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the operation, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up

observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each visible emission observation and opacity reading performed in accordance with Condition 4.2.2(a)(ii)(A). These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

b. i. Carbon Monoxide Requirements (CO)

A. Pursuant to 35 IAC 216.121, the emissions of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air.

ii. Compliance Method (CO Requirements)

See Work Practice requirements in Condition 4.2(2)(c).

c. i. Work Practice Requirements

A. Pursuant to 40 CFR 63.7500(a)(2) and 40 CFR 63 Subpart DDDDD Table 3, the Permittee shall conduct a tune-up of each boiler/heater biennially as specified in 40 CFR 63.7540. Pursuant to 40 CFR 63.7515(d), each biennial tune-up must be no more than 25 months after the previous tune-up. Pursuant to 40 CFR 63.7540(a)(13), if the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

B. Pursuant to 40 CFR 63.7540(a)(11) and 40 CFR 63.7540(a)(10)(i) through 63.7540(a)(10)(v), each biennial tune-up shall consist of:

- I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months).
- II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
- IV. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
- V. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

ii. Compliance Method (CO Requirements)

Recordkeeping

- A. Pursuant to 40 CFR 63.7540(a)(10)(vi)(A) through (C), the Permittee shall maintain records of each tune-up as follows:
- I. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler.
 - II. A description of any corrective actions taken as a part of the combustion adjustment.
 - III. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of the reporting requirements of 40 CFR 63.7550. See also Condition 4.2.5(b).

3. Non-Applicability Determinations

- a. Pursuant to 35 IAC 215.303, the boilers/fuel emission units are not subject to 35 IAC 215.301.
- b. The boilers/fuel combustion emission units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the boilers not use an add-on control device to achieve compliance with an emission limitation or standard.
- c. The boiler is not subject to the New Source Performance Standards (NSPS) Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Db, because each boiler heat input is less than 100 mmBtu/hr, pursuant to 40 CFR 60.40b(a).
- d. The boilers with heat input less than 10 mmBtu/hr are not subject to 35 IAC 216.121, CO emissions for Fuel Combustion Emission Sources.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.2(2)(a) and 4.2(2)(b).

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- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
 - ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
 - iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- b. Federal Reporting
- i. NESHAP Reporting (40 CFR 63 Subpart DDDDD)
 - A. The Permittee shall meet the applicable notification requirements of 40 CFR 63.7545 and 40 CFR Part 63 Subpart A.
 - B. The Permittee shall meet the applicable reporting requirements of 40 CFR 63.7550.

Section 5 - Additional Title I Requirements

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.210 and 201.211, the following activities at the source constitute insignificant activities. Pursuant to Sections 9.1(d) and 39.5(6)(a) of the Act, the insignificant activities are subject to specific standards promulgated pursuant to Sections 111, 112, 165, or 173 of the Clean Air Act. The Permittee shall comply with the following applicable requirements:

| Insignificant Activity | Number of Units | Insignificant Activity Category |
|---|-----------------|---------------------------------|
| Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4). | 25 | 201.210(a)(4) |
| Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units. | 1 | 201.210(a)(16) |

a. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements in addition to the applicable requirements in Condition 6.4:

b. i. Fuel Combustion Emission Units:

A. Pursuant to 40 CFR 63.7540(a) and after January 31, 2016, the Permittee shall comply with the following tune-up requirements for each boiler or process heater with a heat capacity of 5 million Btu per hour or less and conduct such tune-ups every 5 years, unless the boiler is equipped with an oxygen trim system that maintains and optimum air to fuel ratio:

ii. Compliance Method (Work Practice Requirements)Recordkeeping

A. Pursuant to 40 CFR 63.7540(a), the Permittee shall keep the following records:

I. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;

II. A description of any corrective actions taken as a part of the tune-up; and

III. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

c. i. Internal Combustion Engine:

A. NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR 63 Subpart ZZZZ)

I. The engine shall meet the applicable emission limitations, operating limitations, and other requirements in 40 CFR 63.6602.

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- II. The engine shall meet the applicable compliance demonstration requirements in 40 CFR 63.6640.
- III. The engine shall meet the applicable work practice requirements established in Table 2c of 40 CFR 63 Subpart ZZZZ.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

| Insignificant Activity | Number of Units | Insignificant Activity Category |
|--|-----------------|---------------------------------|
| Cold Cleaners | 5 | 35 IAC 201.211(a) |
| Gasoline Storage Vessel (75 gallons) | 1 | 35 IAC 201.211(a) |
| Storage tanks < 10,000 gallon with annual throughput < 100,000 gallon (not storing gasoline or any material listed as a HAP). | 8 | 35 IAC 201.210(a)(10) |
| Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oil. | 2 | 35 IAC 201.210(a)(11) |
| Die casting machines where metal or plastic is formed under pressure in a die. | 22 | 201.210(a)(12) |

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. 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 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.201, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 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 35 IAC 215 Subpart K shall apply only to photochemically reactive material.

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- e. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 215.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
- b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
 - A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.
- iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

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b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
- i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. 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 emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
- i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but no

later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

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 PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM 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(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation: [35 IAC 212.321(b)]

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

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units: [35 IAC 212.321(c)]

| <u>P</u> (T/hr) | <u>E</u> (lbs/hr) | <u>P</u> (T/hr) | <u>E</u> (lbs/hr) |
|--------------------|----------------------|--------------------|----------------------|
| 0.05 | 0.55 | 25.00 | 14.00 |
| 0.10 | 0.77 | 30.00 | 15.60 |
| 0.20 | 1.10 | 35.00 | 17.00 |
| 0.30 | 1.35 | 40.00 | 18.20 |
| 0.40 | 1.58 | 45.00 | 19.20 |
| 0.50 | 1.75 | 50.00 | 20.50 |
| 0.75 | 2.40 | 100.00 | 29.50 |
| 1.00 | 2.60 | 150.00 | 37.00 |
| 2.00 | 3.70 | 200.00 | 43.00 |
| 3.00 | 4.60 | 250.00 | 48.50 |
| 4.00 | 5.35 | 300.00 | 53.00 |
| 5.00 | 6.00 | 350.00 | 58.00 |
| 10.00 | 8.70 | 400.00 | 62.00 |
| 15.00 | 10.80 | 450.00 | 66.00 |
| 20.00 | 12.50 | 500.00 | 67.00 |

3. 40 CFR 63 Subpart A Requirements (NESHAP)

a. 40 CFR 63 Subpart A and Subpart PPPP - Surface Coating of Plastic Parts and Products

Pursuant to 40 CFR 63 Subpart A and Subpart PPPP, the Permittee shall comply with the following applicable General Provisions as indicated:

| Citation | Subject | Applicable to subpart PPPP | Explanation |
|-------------------|---|----------------------------|---|
| \$63.1(a)(1)-(14) | General Applicability | Yes | |
| \$63.1(b)(1)-(3) | Initial Applicability Determination | Yes | Applicability to Subpart PPPP is also specified in §63.4481. |
| \$63.1(c)(1) | Applicability After Standard Established | Yes | |
| \$63.1(c)(2)-(3) | Applicability of Permit Program for Area Sources | No | Area sources are not subject to Subpart PPPP. |
| \$63.1(c)(4)-(5) | Extensions and Notifications | Yes | |
| \$63.1(e) | Applicability of Permit Program Before Relevant Standard is Set | Yes | |
| \$63.2 | Definitions | Yes | Additional definitions are specified in §63.4581. |
| \$63.3(a)-(c) | Units and Abbreviations | Yes | |
| \$63.4(a)(1)-(5) | Prohibited Activities | Yes | |
| \$63.4(b)-(c) | Circumvention/Severability | Yes | |
| \$63.5(a) | Construction/Reconstruction | Yes | |
| \$63.5(b)(1)-(6) | Requirements for Existing, Newly Constructed, and Reconstructed Sources | Yes | |
| \$63.5(d) | Application for Approval of Construction/Reconstruction | Yes | |
| \$63.5(e) | Approval of Construction/Reconstruction | Yes | |
| \$63.5(f) | Approval of Construction/Reconstruction Based on Prior State Review | Yes | |
| \$63.6(a) | Compliance With Standards and Maintenance Requirements-Applicability | Yes | |
| \$63.6(b)(1)-(7) | Compliance Dates for New and Reconstructed Sources | Yes | Section 63.4483 specifies the compliance dates. |
| \$63.6(c)(1)-(5) | Compliance Dates for Existing Sources | Yes | Section 63.4483 specifies the compliance dates. |
| \$63.6(e)(1)-(2) | Operation and Maintenance | Yes | |
| \$63.6(e)(3) | Startup, Shutdown, and Malfunction Plan | Yes | Only sources using an add-on control device to comply with the standard must complete startup, shutdown, and malfunction plans. |

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Section 7 - Other Requirements
7.3 - 40 CFR 63 Subpart A Requirements (NESHAP)

| Citation | Subject | Applicable to subpart PPPP | Explanation |
|------------------|--|----------------------------|--|
| §63.6(f)(1) | Compliance Except During Startup, Shutdown, and Malfunction | Yes | Applies only to sources using an add-on control device to comply with the standard. |
| §63.6(f)(2)-(3) | Methods for Determining Compliance | Yes | |
| §63.6(g)(1)-(3) | Use of an Alternative Standard | Yes | |
| §63.6(h) | Compliance With Opacity/Visible Emission Standards | No | Subpart PPPP does not establish opacity standards and does not require continuous opacity monitoring systems (COMS). |
| §63.6(i)(1)-(16) | Extension of Compliance | Yes | |
| §63.6(j) | Presidential Compliance Exemption | Yes | |
| §63.7(a)(1) | Performance Test Requirements—Applicability | Yes | Applies to all affected sources. Additional requirements for performance testing are specified in §§63.4564, 63.4565, and 63.4566. |
| §63.7(a)(2) | Performance Test Requirements—Dates | Yes | Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standards. Section 63.4560 specifies the schedule for performance test requirements that are earlier than those specified in §63.7(a)(2). |
| §63.7(a)(3) | Performance Tests Required By the Administrator | Yes | |
| §63.7(b)-(e) | Performance Test Requirements—Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test | Yes | Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standards. |
| §63.7(f) | Performance Test Requirements—Use Alternative Test Method | Yes | Applies to all test methods except those of used to determine capture system efficiency. |
| §63.7(g)-(h) | Performance Test Requirements—Data Analysis, Recordkeeping, Reporting, Waiver of Test | Yes | Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standards. |
| §63.8(a)(1)-(3) | Monitoring Requirements—Applicability | Yes | Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standards. Additional requirements for monitoring are specified in §63.4568. |
| §63.8(a)(4) | Additional Monitoring Requirements | No | Subpart PPPP does not have monitoring requirements for flares. |
| §63.8(b) | Conduct of Monitoring | Yes | |
| §63.8(c)(1)-(3) | Continuous Monitoring Systems (CMS) Operation and Maintenance | Yes | Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for CMS operations and maintenance are specified in §63.4568. |

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Section 7 - Other Requirements
7.3 - 40 CFR 63 Subpart A Requirements (NESHAP)

| Citation | Subject | Applicable to subpart PPPP | Explanation |
|-----------------------|--|----------------------------|--|
| §63.8(c)(4) | CMS | No | Section 63.4568 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply. |
| §63.8(c)(5) | COMS | No | Subpart PPPP does not have opacity or visible emission standards. |
| §63.8(c)(6) | CMS Requirements | No | Section 63.4568 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply. |
| §63.8(c)(7) | CMS Out-of-Control Periods | Yes | |
| §63.8(c)(8) | CMS Out-of-Control Periods and Reporting | No | Section 63.4520 requires reporting of CMS out-of-control periods. |
| §63.8(d)-(e) | Quality Control Program and CMS Performance Evaluation | No | Subpart PPPP does not require the use of continuous emissions monitoring systems. |
| §63.8(f)(1)-(5) | Use of an Alternative Monitoring Method | Yes | |
| §63.8(f)(6) | Alternative to Relative Accuracy Test | No | Subpart PPPP does not require the use of continuous emissions monitoring systems. |
| §63.8(g)(1)-(5) | Data Reduction | No | Sections 63.4567 and 63.4568 specify monitoring data reduction. |
| §63.9(a)-(d) | Notification Requirements | Yes | |
| §63.9(e) | Notification of Performance Test | Yes | Applies only to capture system and add-on control device performance tests at sources using these to comply with the standards. |
| §63.9(f) | Notification of Visible Emissions/Opacity Test | No | Subpart PPPP does not have opacity or visible emission standards. |
| §63.9(g)(1)-(3) | Additional Notifications When Using CMS | No | Subpart PPPP does not require the use of continuous emissions monitoring systems. |
| §63.9(h) | Notification of Compliance Status | Yes | Section 63.4510 specifies the dates for submitting the notification of compliance status. |
| §63.9(i) | Adjustment of Submittal Deadlines | Yes | |
| §63.9(j) | Change in Previous Information | Yes | |
| §63.10(a) | Recordkeeping/Reporting-Applicability and General Information | Yes | |
| §63.10(b)(1) | General Recordkeeping Requirements | Yes | Additional requirements are specified in §§63.4530 and 63.4531. |
| §63.10(b)(2)(i)-(v) | Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS | Yes | Requirements for startup, shutdown, and malfunction records only apply to add-on control devices used to comply with the standards. |
| §63.10(b)(2)(vi)-(xi) | | Yes | |
| §63.10(b)(2)(xii) | Records | Yes | |

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| Citation | Subject | Applicable to subpart PPPP | Explanation |
|---------------------|---|----------------------------|---|
| \$63.10(b)(2)(xiii) | | No | Subpart PPPP does not require the use of continuous emissions monitoring systems. |
| \$63.10(b)(2)(xiv) | | Yes | |
| \$63.10(b)(3) | Recordkeeping Requirements for Applicability Determinations | Yes | |
| \$63.10(c)(1)-(6) | Additional Recordkeeping Requirements for Sources with CMS | Yes | |
| \$63.10(c)(7)-(8) | | No | The same records are required in §63.4520(a)(7). |
| \$63.10(c)(9)-(15) | | Yes | |
| \$63.10(d)(1) | General Reporting Requirements | Yes | Additional requirements are specified in §63.4520. |
| \$63.10(d)(2) | Report of Performance Test Results | Yes | Additional requirements are specified in §63.4520(b). |
| \$63.10(d)(3) | Reporting Opacity or Visible Emissions Observations | No | Subpart PPPP does not require opacity or visible emissions observations. |
| \$63.10(d)(4) | Progress Reports for Sources With Compliance Extensions | Yes | |
| \$63.10(d)(5) | Startup, Shutdown, and Malfunction Reports | Yes | Applies only to add-on control devices at sources using these to comply with the standards. |
| \$63.10(e)(1)-(2) | Additional CMS Reports | No | Subpart PPPP does not require the use of continuous emissions monitoring systems. |
| \$63.10(e)(3) | Excess Emissions/CMS Performance Reports | No | Section 63.4520(b) specifies the contents of periodic compliance reports. |
| \$63.10(e)(4) | COMS Data Reports | No | Subpart PPPP does not specify requirements for opacity or COMS. |
| \$63.10(f) | Recordkeeping/Reporting Waiver | Yes | |
| \$63.11 | Control Device Requirements/Flares | No | Subpart PPPP does not specify use of flares for compliance. |
| \$63.12 | State Authority and Delegations | Yes | |
| \$63.13 | Addresses | Yes | |
| \$63.14 | Incorporation by Reference | Yes | |
| \$63.15 | Availability of Information/Confidentiality | Yes | |

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b. 40 CFR 63 Subpart A and Subpart DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters

Pursuant to 40 CFR 63 Subpart A and Subpart DDDDD, the Permittee shall comply with the following applicable General Provisions as indicated:

| General Provision Citation | General Provision Applicable? | Subject of Citation | Explanation (if required) |
|----------------------------|-------------------------------|--|---|
| 40 CFR 63.1 | Yes | General Applicability of the General Provisions | |
| 40 CFR 63.2 | Yes | Definitions | |
| 40 CFR 63.3 | Yes | Units and Abbreviations | |
| 40 CFR 63.4 | Yes | Prohibited Activities and Circumvention | |
| 40 CFR 63.5 | Yes | Preconstruction Review and Notification Requirements | |
| 40 CFR 63.6 | Yes | Compliance with Standards and Maintenance Requirements | With exception of: 63.6(e)(1)(i)-(ii); (e)(3); (f)(1); and (h)(1) |
| 40 CFR 63.7 | Yes | Performance Testing Requirements | With exception of: 63.7(e)(1) |
| 40 CFR 63.8 | Yes | Monitoring Requirements | With exception of: 63.8(c)(1)(i) and (c)(1)(iii); and the last sentence of (d)(3) |
| 40 CFR 63.9 | Yes | Notification Requirements | |
| 40 CFR 63.10 | Yes | Recordkeeping and Reporting Requirements | With exception of: 63.10(b)(2)(ii); (b)(2)(iv) and (v); (b)(3); (c)(10) and (11); (c)(15); (d)(3); (d)(5) |
| 40 CFR 63.11 | No | Control Device and Work Practice Requirements | |
| 40 CFR 63.12 | Yes | State Authority and Delegations | |
| 40 CFR 63.13 | Yes | Addresses of State Air Pollution Control Agencies and EPA Regional Offices | |
| 40 CFR 63.14 | Yes | Incorporations by Reference | |
| 40 CFR 63.15 | Yes | Availability of Information and Confidentiality | |
| 40 CFR 63.16 | Yes | Performance Track Provisions | |

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4. Compliance Assurance Monitoring (CAM) Requirements

a. CAM Provisions

i. Proper Maintenance

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

ii. Continued Operation

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

iii. Response to Excursions or Exceedances

- A. Pursuant to 40 CFR 64.7(d)(1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- B. Pursuant to 40 CFR 64.7(d)(2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.
- C. Pursuant to 40 CFR 64.8, if a Quality Improvement Plan threshold specified in Tables 7.4.1 and 7.4.2, as appropriate, is exceeded then the source shall develop according to the requirements in 40 CFR 64.8(b)(2) and implement a Quality Improvement Plan (QIP) as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. Implementation of a QIP shall not excuse the source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping

requirement that may apply under federal, state, or local law, or any other applicable requirements under the Clean Air Act.

b. Monitoring - Monitoring

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 7.4.4(e) below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

c. Monitoring - Recordkeeping

Pursuant to 40 CFR 64.9(b)(1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, any written quality improvement plan (QIP) and any activities undertaken to implement a quality improvement plan, and other supporting information related to the monitoring requirements established for CAM.

d. Monitoring - Reporting

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(ii).
- C. A description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, include documentation that the implementation of the QIP has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

e. CAM Plans

The following tables contain the CAM Plans in this CAAPP permit:

| Table | Emission Unit Section | PSEU Designation | Control Device | Pollutant |
|-------|-----------------------|--|----------------|-----------|
| 7.4.1 | 4.1 | Plastic Parts Coating Lines and Associated Equipment | Two Oxidizers | VOM |

Table 7.4.1 - CAM Plan

| | |
|------------------------|---------------------------------|
| Emission Unit Section: | 4.1 Plastic Parts Coating Lines |
| PSEU Designation: | See 7.4(e) |
| Pollutant: | VOM |

| Indicators: | #1) Temperature | #2) Pressure Drop |
|---|--|--|
| General Criteria | | |
| The Monitoring Approach Used to Measure the Indicators: | Temperature of oxidizers | Pressure drop at NDO's |
| The Indicator Range Which Provides a Reasonable Assurance of Compliance: | 1400°F (RTO); 1200°F (DURR); 1000°F (RCO) | Maintain pressure drop above 0.007 in H ₂ O |
| Quality Improvement Plan (QIP) Threshold Levels: | Maintain system at 95% or above | Maintain pressure drop above 0.007 in H ₂ O |
| Performance Criteria | | |
| The Specifications for Obtaining Representative Data: | Per Salem.DURR design criteria | EPA Method 204 |
| Verification Procedures to Confirm the Operational Status of the Monitoring: | Continuous Readings during operations | Continuous Readings during operations |
| Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data: | Thermocouple deviations will be investigated | Pressure sensor deviations will be investigated |
| The Monitoring Frequency: | Continuous during operations | Continuous during operations |
| The Data Collection Procedures That Will Be Used: | Thermocouple readings are recorded every 15 mins | Pressure sensor readings are recorded every 15 mins |
| The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred: | 3 hrs | 3 hrs |

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, 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. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

| <i>Pollutant</i> | | <i>Tons/Year</i> |
|--------------------------------|--------------------|------------------|
| Volatile Organic Material | (VOM) | 150.00 |
| Sulfur Dioxide | (SO ₂) | 0.25 |
| Particulate Matter | (PM) | 10.26 |
| Nitrogen Oxides | (NO _x) | 55.91 |
| HAP, not included in VOM or PM | (HAP) | ---- |
| Total | | 216.42 |

Attachment 1 - List of Emission Units at This Source

| <i>Section</i> | <i>Emission Units</i> | <i>Description</i> |
|----------------|--|--|
| 4.1 | Plastic Parts Coating Lines and Associated Equipment | Automotive plastic parts coating operations |
| 4.2 | Fuel Combustion Emission Units | Natural gas-fired units are used to provide heat and steam for plant needs |

Attachment 2 - Acronyms and Abbreviations

| | |
|------------------|--|
| acfm | Actual cubic feet per minute |
| 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 |
| Btu | British Thermal Units |
| CAA | Clean Air Act [42 U.S.C. Section 7401 et seq.] |
| CAAPP | Clean Air Act Permit Program |
| CAIR | Clean Air Interstate Rule |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emission Monitoring System |
| CFR | Code of Federal Regulations |
| CISWI | Commercial Industrial Solid Waste Incinerator |
| CO | Carbon monoxide |
| CO ₂ | Carbon dioxide |
| COMS | Continuous Opacity Monitoring System |
| CPMS | Continuous Parameter Monitoring System |
| dscf | Dry standard cubic foot |
| dscm | Dry standard cubic meter |
| ERMS | Emissions Reduction Market System |
| °F | Degrees Fahrenheit |
| GHG | Green house gas |
| GACT | Generally Acceptable Control Technology |
| gr | Grains |
| HAP | Hazardous air pollutant |
| Hg | Mercury |
| HMIWI | Hospital medical infectious waste incinerator |
| hp | Horsepower |
| hr | Hour |
| H ₂ S | Hydrogen sulfide |
| I.D. No. | Identification number of source, assigned by IEPA |
| IAC | Illinois Administrative Code |
| ILCS | Illinois Compiled Statutes |
| IEPA | Illinois Environmental Protection Agency |
| kw | Kilowatts |
| LAER | Lowest Achievable Emission Rate |
| lbs | Pound |

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| | |
|-------------------|--|
| m | Meter |
| MACT | Maximum Achievable Control Technology |
| M | Thousand |
| MM | Million |
| mos | Month |
| MSDS | Material Safety Data Sheet |
| MSSCAM | Major Stationary Sources Construction and Modification (Non-attainment New Source Review) |
| MW | Megawatts |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO _x | Nitrogen oxides |
| NSPS | New Source Performance Standards |
| NSR | New Source Review |
| PB | Lead |
| PEMS | Predictive Emissions Monitoring System |
| 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 |
| ppm | Parts per million |
| ppmv | Parts per million by volume |
| ppmw | Parts per million by weight |
| PSD | Prevention of Significant Deterioration |
| PSEU | Pollutant-Specific Emission Unit |
| psia | Pounds per square inch absolute |
| PTE | Potential to emit |
| RACT | Reasonable Available Control Technology |
| RMP | Risk Management Plan |
| scf | Standard cubic feet |
| SCR | Selective catalytic reduction |
| SIP | State Implementation 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 |

Attachment 3 - Contact and Reporting Addresses

| | |
|---|---|
| <p>IEPA Compliance Section</p> <p>IEPA Stack Test Specialist</p> <p>IEPA Air Quality Planning Section</p> <p>IEPA Air Regional Field Operations Regional Office #3</p> <p>IEPA Permit Section</p> | <p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276 Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016 Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276 Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Regional Office #3 2009 Mall Street Collinsville, Illinois 62234 Phone No.: 618/346-5120</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506 Phone No.: 217/785-1705</p> |
| <p>USEPA Region 5 - Air Branch</p> | <p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604 Phone No.: 312/353-2000</p> |

Attachment 4 - Example Certification by a Responsible Official

| SIGNATURE BLOCK | |
|--|--------------------|
| <p>NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.</p> | |
| <p>I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))</p> | |
| <p>AUTHORIZED SIGNATURE:</p> | |
| BY: _____ | _____ |
| AUTHORIZED SIGNATURE | TITLE OF SIGNATORY |
| _____ | _____/_____/_____ |
| TYPED OR PRINTED NAME OF SIGNATORY | DATE |

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