

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

H. A. Framburg & Company
Attn: Mark Windt-Vice President
941 Cernan Drive
Bellwood, Illinois 60104-2254

Application No.: 96030117 I.D. No.: 031015ABZ
Applicant's Designation: RESLGTFIX Date Received: March 7, 1996
Operation of: Forming and Finishing of Metallic components
Date Issued: September 26, 2000 Expiration Date²: September 26, 2005
Source Location: 941 Cernan Drive, Bellwood, Cook County
Responsible Official: Mark Windt- Vice President

This permit is hereby granted to the above-designated Permittee to OPERATE metallic components forming and finishing source, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:TK:psj

cc: Illinois EPA, FOS, Region 1
USEPA

- 1 This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.
- 2 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

H. A. Framburg & Company
941 Cernan Drive
Bellwood, Illinois 60104-2254
708/547-0064

I.D. No.: 031015ABZ
Standard Industrial Classification: 3446, Architectural metal work

1.2 Owner/Parent Company

Malcolm Tripp
941 Cernan Drive
Bellwood, Illinois 60104-2254

1.3 Operator

Mark Windt
941 Cernan Drive
Bellwood, Illinois 60104-2254

Timothy McNeil
708/547-5757

1.4 General Source Description

The H. A. Framburg is located at 941 Cernan Drive in Bellwood, Cook County. H.A. Framburg forms and finishes metallic components for lighting fixtures.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

A	Amps
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
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
cfm	Cubic feet per meter
CFR	Code of Federal Regulations
cm	Centimeter
dscf	Dry standard cubic foot
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
ft	Feet
gal	Gallon
gr	Grams
HAP	Hazardous Air Pollutant
hr	Hour
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
in	Inch
kg	kilograms
kPa	kilopascals
KW	Kilowatts
lb	Pound
Mg	Megagram
M	Meter
min	Minute
mmHg	Millimeter mercury
mmBtu	Million British thermal units
mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	Parts per million

PSD	Prevention of Significant Deterioration
psi	Pounds per square inch
RMP	Risk Management Plan
scf	Standard cubic feet
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
wt. %	Weight percent
yr	Year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Soldering Fixture Station
Annealing Tray Station
Buffing /Polishing Stations with Cyclone Dust Collector

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

Steam Boiler and Drying Oven

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

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

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

3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Plant Emission Unit	Description	Date Constructed	Emission Control Equipment
01	ST-05	Brass Plating Line (5 Tanks)	1970	None
	PV-02	Nickel Plating Line (2 Tanks)	1970	None
02	ST-03	Vapor Degreaser - West	1972	None
	ST-04	Vapor Degreaser - East	1970	None
03	ST-06	Lacquer Spray Coating Line	1970	None
	ST-07	Lacquer Dip Coating Line	1970	None
04	ST-08	Lacquer Stripping Tank	1970	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

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

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

- b.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied

on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

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

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

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

5.2.4 Risk Management Plan

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

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

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
- i. Illinois EPA, Compliance Section; and

- ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
- iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 40 CFR Part 60, Subpart EE: Standards of Performance for Surface Coating of Metal Furniture, because the source was constructed, modified, or reconstructed prior to November 28, 1980, which is the applicability date for this regulation.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	22.94
Sulfur Dioxide (SO ₂)	----
Particulate Matter (PM)	4.62
Nitrogen Oxides (NO _x)	----
HAP, not included in VOM or PM	----
TOTAL	27.56

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is

based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.

- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

- 7.1 Unit 01 - Brass Plating Line (ST-05)
Nickel Plating Line (PV-02)
- Control 01 - None

7.1.1 Description

Solid brass parts and cold rolled steel parts are processed in the machining area, where they are hand bent, stamped, punched, or threaded. All steel parts are either plated with copper and brass or copper and nickel.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ST-05	Brass Plating Line (5 Tanks)	None
PV-02	Nickel Plating Line (2 Tanks)	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected plating lines" for the purpose of these unit-specific conditions, are emission units used in the brass plating line and in the nickel plating line, as listed in Condition 7.1.2.
- b. Each affected plating line is subject to the emission limits identified in Condition 5.2.2.
- c. Each affected plating line at the source is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c) (See Also Attachment 2) [35 IAC 212.322(a)].

7.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected plating lines not being subject to 40 CFR Part 63, Subpart N: National Emission Standards for Chromium Emissions from Hard and

Decorative Chromium Electroplating and Chromium Anodizing Tanks, because the electroplating tanks do not perform hard or decorative chromium electroplating or chromium anodizing.

7.1.5 Control Requirements

The Permittee shall follow good operating practices, including periodic inspection and routine maintenance.

7.1.6 Emission Limitations

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

7.1.7 Operating Requirements

None

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected plating lines to demonstrate compliance with Conditions 5.5.1 and 7.1.3, pursuant to Section 39.5(7)(b) of the Act:

- a. A measurement of the Exhaust Air Flowrate across the brass plating tanks, cfm;
- b. The operating schedule of the plating lines (hr/yr);
- c. Records for Nickel Plating
 - i. Average Rectifier Setting, A
 - ii. Hours per day electrodes are energized, hr/mo and hr/yr.
- d. The monthly and aggregate annual PM emissions from the affected plating lines based on the raw material usage and operating schedule, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected plating lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe

the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of PM from affected plating line units in excess of the limits specified in Condition 5.5.1.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- a. To determine compliance with Condition 5.5.1 and PM emissions from the brass plating tanks shall be calculated based on the following:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(gr/dscf)</u>
PM	2.7×10^{-6}

These are the emission factors for the brass plating tanks, Table 12.20-4, AP-42, Volume I, Fifth Edition, Supplement D, July 1996.

Brass Plating Emissions (lb/hr) = (Air Flow, cfm) x (The Appropriate Emission Factor, gr/dscf) x (1 lb/7,000 gr) x (60 min/hr)

- b. To determine compliance with Condition 5.5.1 and PM emissions from the nickel plating tanks shall be calculated based on the following:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(gr/A-hr)</u>
PM	0.63

These are the emission factors for electroplating-other metals, Table 12.20-4, AP-42, Volume I, Fifth Edition, Supplement D, July 1996.

Nickel Plating Emissions (lb) = (Average Rectifier Setting, A) x (Total Hours Electrodes Charged, hr) x (The Appropriate Emission Factor, gr/A-hr) x (1 lb/7,000 gr)

- 7.2 Unit 02 - Vapor Degreaser-West (ST-03)
 Vapor Degreaser-East (ST-04)
 Control 02 - None

7.2.1 Description

After polishing and buffing, the metal parts are degreased (i.e., cleaned) with solvent, mainly trichloroethylene. Emissions of VOM and HAP are the result of solvent evaporation.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ST-03	Vapor Degreaser - West	None
ST-04	Vapor Degreaser - East	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected solvent cleaning machines" for the purpose of these unit-specific conditions, are units used to clean metal parts, as listed in Condition 7.2.2.
- b. The affected solvent cleaning machines is subject to the NESHAP for Halogenated Solvent Cleaning, 40 CFR 63 Subparts A and T, because it uses a solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.
- c. The affected solvent cleaning machines are subject to 35 IAC 218.183, Open Top Vapor Degreasing.

7.2.4 Non-Applicability of Regulations of Concern

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

7.2.5 Operational and Production Limits and Work Practices

- a. The Permittee shall ensure that each existing or new batch vapor solvent cleaning machine conforms to the following design requirements specified in 40 CFR

63.463(a)(1) through (a)(6) of this section [40 CFR 63.463 (a)]:

- i. Each cleaning machine shall be designed or operated to meet the control equipment or technique requirements in paragraph (a)(i)(A) or (a)(i)(B) of this section [40 CFR 63.463(a)(1)(i) or (a)(1)(ii)].
 - A. An idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
 - B. A reduced room draft as described in 40 CFR 63.463(e)(2)(ii).
 - ii. Each cleaning machine shall have a freeboard ratio of 0.75 or greater.
 - iii. Each cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - iv. Each vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - v. Each vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
 - vi. Each vapor cleaning machine shall have a primary condenser.
- b. The Permittee shall comply with the following control combination pursuant to 40 CFR 63.463(b)(1)(ii):
- A batch vapor cleaning machine with a solvent/air interface area of 1.21 square meters (13 square feet) or less shall demonstrate that their solvent cleaning machine can achieve and maintain an idling

emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465(a) and 40 CFR 63 Appendix A.

- c. The Permittee shall meet all of the following required work and operational practices specified below [40 CFR 63.463 (d)(1) through (d)(12)].
 - i. Control air disturbances across the cleaning machine opening(s) by incorporating the control equipment or techniques as follows:
 - A. Cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place; or
 - B. A reduced room draft as described in 40 CFR 63.463(e)(2)(ii).
 - ii. The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - iii. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - iv. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Illinois EPA.
 - v. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.

- vi. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - vii. During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - viii. When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - ix. Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Illinois EPA's satisfaction to achieve the same or better results as those recommended by the manufacturer.
 - x. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, Subpart T, if requested during an inspection by the Illinois EPA.
 - xi. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - xii. Sponges, fabric, wood, and paper products shall not be cleaned.
- d. The Permittee shall comply with the following requirements [40 CFR 63.463 (e)].
- i. Conduct monitoring of each control device used to comply with 40 CFR 63.463.

- ii. Determine during each monitoring period whether each control device used to comply with these standards meets the following requirements.
 - A. The Permittee shall comply with the following requirements for the reduced room draft [40 CFR 63.463 (e)(2)(ii)]:
 - 1. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in 40 CFR 63.466(d) (see also Condition 7.2.8(d)).
 - 2. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466(d) (see also Condition 7.2.8(d)).
 - B. The Permittee shall comply with the following requirements for a dwell [40 CFR 63.463 (e)(2)(v)]:
 - 1. Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described in 40 CFR 63.465(d) (see also Condition 7.2.7(b)).
 - 2. Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.

- e. Operating Requirements - Pursuant to 35 IAC 218.183(a), no person shall operate an open top vapor degreaser unless:
 - i. The cover of the degreaser is closed when workloads are not being processed through the degreaser;
 - ii. Solvent carryout emissions are minimized by:
 - A. Racking parts to allow complete drainage;
 - B. Moving parts in and out of the degreaser at less than 3.3 m/min (11 ft/min);
 - C. Holding the parts in the vapor zone until condensation ceases;
 - D. Tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and
 - E. Allowing parts to dry within the degreaser until visually dry.
 - iii. Porous or absorbent materials, such as cloth, leather, wood or rope are not degreased;
 - iv. Less than half of the degreaser's open top area is occupied with a workload;
 - v. The degreaser is not loaded to the point where the vapor level would drop more than 10 cm (4 in) when the workload is removed from the vapor zone;
 - vi. Spraying is done below the vapor level only;
 - vii. Solvent leaks are repaired immediately;
 - viii. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - ix. Water is not visually detectable in solvent exiting from the water separator; and
 - x. Exhaust ventilation exceeding 20 cubic meters per minute per square meter (65 cubic feet per minute per square foot) of degreaser open area

is not used, unless necessary to meet the requirements of the Occupational Safety and Health Act (29 U.S.C. Section 651 et seq.).

- f. Equipment Requirements - Pursuant to 35 IAC 218.183(b), no person shall operate an open top vapor degreaser unless:
 - i. The degreaser is equipped with a cover designed to open and close easily without disturbing the vapor zone;
 - ii. The degreaser is equipped with the following switches:
 - A. One which shuts off the sump heat if the amount of condenser coolant is not sufficient to maintain the designed vapor level; and
 - B. One which shuts off the spray pump if the vapor level drops more than 10 cm (4 in) below the bottom condenser coil; and
 - C. One which shuts off the sump heat source when the vapor level exceeds the design level.
 - iii. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
 - iv. The degreaser is equipped with one of the following devices:
 - A. A freeboard height of 3/4 of the inside width of the degreaser tank or 91 cm (36 in), whichever is less; and if the degreaser opening is greater than 1 square meter (10.8 square feet), a powered or mechanically assisted cover; or
 - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA and further processed consistent with 35 IAC 218.108. Such equipment or system may include a refrigerated chiller, an enclosed design or a carbon adsorption system.

7.2.6 Emission Limitations

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

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

VOM Emissions	
<u>(lb/hour)</u>	<u>(ton/year)</u>
14.69	14.10

These limits are based on solvent usage and material balance.

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- c. The above limitations were established in Permit 81050016, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.2.7 Testing Requirements

- a. The Permittee shall conduct a performance test to demonstrate compliance with the idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area. The idling emission rate shall be determined using Reference Method 307 in Appendix A of 40 CFR Part 63 [40 CFR 63.463 (f)(1)(i) and 40 CFR 63.465 (a)].
- b. The Permittee using a dwell time to comply with 40 CFR 63.463 shall determine the appropriate dwell time for each part or parts basket using the procedure specified below [40 CFR 63.465(d)]:
 - i. Determine the amount of time for the part or parts basket to cease dripping once placed in the vapor zone. The part or parts basket used for this determination must be at room temperature before being placed in the vapor zone.

- ii. The proper dwell time for parts to remain in the freeboard area above the vapor zone is no less than 35 percent of the time determined in subparagraph (i) of this paragraph.

7.2.8 Monitoring Requirements

- a. The Permittee complying with the equipment standards in 40 CFR 63.463 shall monitor the hoist speed as described below [40 CFR 63.466(c)]:
 - i. The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - ii. The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
 - iii. If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
 - iv. If the Permittee can demonstrate to the Illinois EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- b. The Permittee complying with the idling emission limit standards of 40 CFR 63.463(b)(1)(ii) shall comply with the requirements as described below [40 CFR 63.466(f)(1)]:
 - i. If using controls listed in 40 CFR 63.466(a) through (e), the Permittee shall comply with the monitoring frequency requirements in 40 CFR 63.466(a) through (e).
 - ii. If using controls not listed in 40 CFR 63.466(a) through (e), the Permittee shall establish the monitoring frequency for each

control and submit it to the Illinois EPA for approval in the initial test report.

- c. The Permittee shall conduct monitoring and record the results on a monthly basis as specified below [40 CFR 63.466(b)]:

If a dwell is used, the Permittee shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.

- d. The Permittee shall conduct monitoring and record the results as specified paragraphs (d)(i) or (d)(ii) of this section [40 CFR 63.466(d)]:

- i. If the reduced room draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), the Permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters as specified in paragraphs (d)(i)(A) and (d)(i)(B) of this section.

A. Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the procedure specified in paragraphs (d)(i)(A)(1) through (d)(i)(A)(4) of this section.

1. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
2. Orient a velometer in the direction of the wind current at each of the four corners of the machine.
3. Record the reading for each corner.
4. Average the values obtained at each corner and record the average wind speed.

B. Monitor on a weekly basis the room parameters established during the initial

compliance test that are used to achieve the reduced room draft.

- ii. If an enclosure (full or partial) is used to achieve a reduced room draft, the owner or operator shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the windspeed within the enclosure using the procedure specified in paragraphs (d)(ii)(A) and (d)(ii)(B) of this section and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.
 - A. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.
 - B. Record the maximum wind speed.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected solvent cleaning machine to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine starting no later than December 2, 1997:
 - i. Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment [40 CFR 63.467 (a)(1)].
 - ii. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to or on, November 29, 1993, or after November 29, 1993, may be substituted [40 CFR 63.467 (a)(2)].
 - iii. Records of the tests required in 40 CFR 63.465(d) to determine an appropriate dwell

time for each part or parts basket [40 CFR 63.467 (a)(3)].

- iv. The Permittee shall maintain records of the performance test for idling emissions, including the idling emission rate and values of the monitoring parameters measured during the test [40 CFR 63.467 (a)(4)].
 - v. Records of the halogenated HAP solvent content for each solvent used in the solvent cleaning machine [40 CFR 63.467 (a)(5)].
- b. The Permittee shall maintain the following records in written or electronic form for a period of 5 years starting no later than December 2, 1997:
- i. The results of control device monitoring required under 40 CFR 63.466 (see also Condition 7.2.8) [40 CFR 63.467 (b)(1)].
 - ii. Information on the action taken to comply with idling mode cover and operating the solvent cleaning machine within parameters identified in the performance test for idling emissions. This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels [40 CFR 63.467 (b)(2)].
 - iii. Estimates of annual solvent consumption for the solvent cleaning machine [40 CFR 63.467 (b)(3)].
- c. The Permittee shall maintain the following records:
- i. Monthly and annual solvent usage (gal/mo and gal/yr); and
 - ii. Type and density of solvent used.
- d. The monthly and aggregate annual VOM and HAP emissions from the affected solvent cleaning machines based on the solvent usage and solvent density, with supporting calculations.

7.2.10 Reporting Requirements

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

- a. The Permittee complying with the provisions of 40 CFR 63.463 shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified below [40 CFR 63.468 (f)]:
 - i. A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10)."
 - ii. An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- b. The Permittee shall submit a semiannual exceedance report to the Illinois EPA except when, the Illinois EPA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under 40 CFR 63.468(i) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the following [40 CFR 63.468 (h)]:
 - i. Information on the actions taken to comply with 40 CFR 63.463 (e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

iii. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

c. Emissions of VOM in excess of the limit specified by Condition 7.2.6(a) within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1 and 7.2.6, VOM emissions from the affected solvent cleaning machines shall be calculated based on the following:

Emission (lb) = Solvent Usage (U, gal) x Solvent Density (lb/gal)

- 7.3 Unit 03 - Lacquer Spray Coating Line (ST-06)
 Lacquer Dip Coating Line (ST-07)
 Control 03 - None

7.3.1 Description

After cleaning, the metal parts are sent to the Lacquer Room where they are either spray or dip-coated prior to air-drying.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ST-06	Lacquer Spray Coating Line	None
ST-07	Lacquer Dip Coating Line	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected coating lines" for the purpose of these unit-specific conditions, are emission units used in lacquer spray coating and lacquer dip coating, as listed in Condition 7.3.2.
- b. Each affected coating line is subject to the emission limits identified in Condition 5.2.2.
- c. Each affected coating line at the source is subject to 35 IAC 212.321(a), which requires that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)] (See Attachment 2).

- d. The affected coating lines (ST-06 and ST-07) at the source are subject to 35 IAC 218.204(g)(1) for Air Dried Metal Furniture Coatings which provides that:
 - i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as

applied to Miscellaneous Metal Parts and Products for clear coating. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/liter</u>	<u>lbs/gallon</u>
0.34	2.8

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected coating lines are not subject to the NSPS for surface coating of Metal Furniture, 40 CFR 60 Subparts A and EE because construction of the affected coating lines was commenced prior to November 28, 1980.
- b. No owner or operator of a coating line subject to the limitations of Section 218.204 is required to meet the limitations of Subpart G(Section 218.301 or 218.302), after the date by which the coating line is required to meet Section 218.204.

7.3.5 Operational and Production Limits and Work Practices

None

7.3.6 Emission Limitations

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

7.3.7 Testing Requirements

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

Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on each affected coating line shall be determined according

to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

- a. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of CFR 60 Appendix A and the procedures of 35 IAC 218.105(a)
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.3.9(a) directly reflect the application of such material and separately account for any additions of solvent. [35 IAC 218.105(a)].

7.3.8 Inspection Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 5.5.1 and 7.3.3 of this section, pursuant to Section 39.5(7)(b) of the Act:

- a.
 - i. The name and identification number of each coating as applied on the affected coating line
 - ii. The usage of each coating on each affected coating line, in units of gallons/day, gallons/month and gallons/year
 - iii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each affected coating line
- b. Records of the testing of VOM and HAP content (in wt. %) of each coating as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested
 - ii. Results of analysis

- iii. Documentation of analysis methodology
 - iv. Person performing analysis
- c. The operating schedule of the affected coating line

7.3.10 Reporting Requirements

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

Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.3.3(d) within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance as required and the work-practices inherent in operation of an affected coating line.
- b. To determine compliance with Condition 5.5.1, VOM emissions from the affected coating lines 7.3.3(d) shall be calculated based on the following:

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

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = 3 (w_i/d_i),$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i , in lb/gal

and the summation 3 is applied over water and all exempt compounds i , in the coating.

7.3.13 Compliance Schedules

- a. The Permittee was sent a Violation Notice A-2000-00195 for violation of 35 IAC 218.204(g)(1) for air-dried metal furniture coatings. There is insufficient data to demonstrate that the affected coating lines are in compliance with 35 IAC 218.204(g)(1). The emission limitations for these coatings, which are expressed in units of VOM per volume of coatings (minus water and any compounds which are specifically exempted from the definition of VOM) were reduced from 3.0 lbs of VOM/gal to 2.8lbs VOM/gal effective March 15, 1996. Based on this information it appears that the affected coating lines maybe in violation of 35 IAC 204(g)(1). Therefore, the permit shield in Section 8.1 does not shield the Permittee from possible enforcement actions initiated by either USEPA or the Illinois EPA involving the above named emission units or activities. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such outstanding issue (e.g., include a new compliance schedule, identify appropriate applicable requirements, establish new requirements, and revise the ERMS baseline).
- b. The affected coating lines shall comply with the following schedule of compliance to address compliance with the alleged violations of 35 IAC 218.204(g)(1):

Milestone	Timing
Emissions from the affected coating lines shall not exceed 2.8 lbs VOM/ gal. Appropriate records shall be maintained that allow verification of compliance with these limits	No later than 90 days from the date issued of this permit
The Permittee shall achieve full compliance with all requirements resulting from	No later than any schedule established pursuant to resolution

resolution of any enforcement issues regarding any alleged violation of 35 IAC 218.204(g)(1)	of any enforcement action pertaining to the alleged violation of 35 IAC 218.204(g)(1)
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c. Submittal of Progress Reports

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

- i. The required timeframe for achieving the milestones in the schedule for compliance, and actual dates when such milestones were achieved.
- ii. An explanation of why any required timeframe in the schedule of compliance was not met, and any preventive or corrective measures adopted.

7.4 Unit 04 - Lacquer Stripping Tank (ST-08)
Control 04 - None

7.4.1 Description

The Lacquer Stripping Tank is a batch cold cleaning tank used for cleaning the reworked lighting fixtures and spray guns from the lacquer.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
ST-08	Lacquer Stripping Tank	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected cold cleaning tank " for the purpose of these unit-specific conditions, is the lacquer stripping tank, as listed in Condition 7.4.2.
- b. The affected cold cleaning tank is subject to 35 IAC 218.182, Cold Cleaning.
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 218.301].

7.4.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected cold cleaning tank not being subject to 40 CFR 63 Subparts A and T because it does not use a solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

7.4.5 Operational and Production Limits and Work Practices

- a. Operating Requirements - Pursuant to 35 IAC 218.182(a), No person shall operate a cold cleaning degreaser unless:
 - i. Waste solvent is stored in covered containers only and not disposed of in such manner that

more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere [35 IAC 218.182(a)(1)];

ii. The cover of the degreaser is closed when parts are not being handled [35 IAC 218.182(a)(2)]; and

iii. Parts are drained until dripping ceases [35 IAC 218.182(a)(3)].

b. Equipment Requirements - Pursuant to 35 IAC 218.182(b), no person shall operate a cold cleaning degreaser unless:

i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counterweights or a powered system if:

A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F) [35 IAC 218.182(b)(1)(A)];

B. The solvent is agitated [35 IAC 218.182(b)(1)(B)]; or

C. The solvent is heated above ambient room temperature [35 IAC 218.182(b)(1)(C)].

ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:

A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) [35 IAC 218.182(b)(2)(A)]; or

B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external [35 IAC 218.182(b)(2)(B)].

iii. The degreaser is equipped with A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less, if the vapor pressure of the solvent is greater than

4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point [35 IAC 218.182(b)(3)(A)];

- iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser [35 IAC 218.182(b)(4)]; and
 - v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray [35 IAC 218.182(b)(5)].
- c. This permit is issued based on solvent used in the affected cold cleaning tank not containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

7.4.6 Emission Limitations

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

7.4.7 Testing Requirements

- a. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the vapor pressure of the cleaning solvent, the exhaust ventilation rates, and the performance of any control devices shall be determine according to the methods specified in Condition 7.4.7(b).
- b. The following test methods shall be used to demonstrate compliance with 35 IAC 218 Subpart E:
 - i. Vapor pressures shall be determined by using the procedure specified in 35 IAC 218.110 [35 IAC 218.186(a)];
 - ii. Exhaust ventilation rates shall be determined by using the procedures specified in 35 IAC 218.105(f)(3) [35 IAC 218.186(b)]; and
 - iii. The performance of control devices shall be determined by using the procedures specified in 35 IAC 218.105(f) [35 IAC 218.186(c)].

7.4.8 Inspection Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected cold cleaning tank to demonstrate compliance with Conditions 5.5.1 and 7.4.3 of this section, pursuant to Section 39.5(7)(b) of the Act:

- a. Pursuant to 35 IAC 218.182 (d)(2), all persons subject to the material requirements of 35 IAC 218.182(c), must maintain records which include for each purchase:
 - i. The name and address of the solvent supplier;
 - ii. The date of purchase;
 - iii. The type of solvent;
 - iv. The total volume solvent;
 - v. The vapor pressure of the solvent measured in mmHg at 20°C(68°F).
- b. All records required by recordkeeping shall be retained for three years and shall be made available to the Illinois EPA upon request. [35 IAC 218.182(e)].
- c. Solvent use, lb/mo and ton/yr.
- d. Monthly and aggregate VOM emissions from the affected cold cleaning tank based on the solvent use, with supporting calculations.

7.4.10 Reporting Requirements

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

The use of any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-

trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent, within 30 days of any record of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

To determine compliance with the Condition 5.5.1, VOM and HAP emissions from the affected cold cleaning tank shall be calculated based on the following:

HAP Emissions (lb) = (Cleaning Solvent HAP Consumption, lb)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after **July 20, 2000** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

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

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

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

- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

- iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)

P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Particulate Matter Emissions from Process Emission Units

10.2.1 35 IAC 212.321 Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

- a. Except as further provided in 35 IAC Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

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

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

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

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

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

- c. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>Ton/hr</u>	<u>lbs/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50
90.	13.4	100.00	29.50
140.	17.0	150.00	37.00
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and
E = Allowable emission rate in kg/hr or lbs/hr.

10.2.2 35 IAC 212.322 Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972.

- a. Except as further provided in 35 IAC Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
- b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

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

- i. For process weight rates up to 27.2 Mg/hr (30 Ton/hr):

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

- ii. For process weight rates in excess or 27.2 Mg/hr (30 Ton/hr):

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

- c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972

Metric English

P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>Ton/hr</u>	<u>lbs/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.	8.7	10.00	19.20
13.	11.1	15.00	25.20
18.	13.8	20.00	30.50
23.	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and
E = Allowable emission rate in kg/hr or lbs/hr.

TK:psj