

<u>Material</u>	<u>VOM Usage</u>		<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>		<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Headliner Process Line (Total)	100	1,008	VOM	100	0.51
			HAP ^A	60	0.30
			HAP ^B	100	0.51
Adhesives and Solvents (Total)	200	2,000	VOM	200	1.00
			HAP ^A	200	1.00
			HAP ^B	200	1.00

^A Single Hazardous Air Pollutant (i.e. Phenol)

^B Total Combined Hazardous Air Pollutants

These limits are based on material VOM usage = material usage x material VOM Content, material HAP usage = material usage x material HAP Content complete volatilization of the VOM and HAP content of the materials, and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. Emissions and operation of natural gas combustion shall not exceed the following limits:

<u>Process</u>	<u>Natural Gas Usage</u>		<u>Pollutant</u>	<u>Emission Factor (Lb/mmscf)</u>	<u>Emissions</u>	
	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>			<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
Natural Gas Combustion	5	43	NO _x	100	500	2.15
			CO	84	420	1.81
			PM	7.6	38	0.16
			VOM	5.5	28	0.12
			SO ₂	0.6	3	0.02

These limits are based on standard AP-42 emission factors, natural gas as the only fuel fired in the units, and information provided in the permit application. Compliance with annual limits shall be determined from a running total of 12 months of data.

4. This permit is issued based on negligible emissions of particulate matter (PM) from the 2 plastic grinders with baghouse and 5 production lines. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
5. This permit is issued based on negligible emissions of particulate matter (PM), Volatile Organic materials (VOM), and Carbon Monoxide (CO) from the Burn-off ovens with afterburners due to material burn-off. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- 6a. The afterburners shall be in operation at all times when the burning is performed in associated emission units.
- b. Upon completion of start-up and achievement of normal operation, the afterburner combustion chamber shall be preheated to 1400° F or to at

least the manufacturer's recommended temperature before the burning process is begun; this temperature shall be maintained during the coating process.

- c. The afterburners shall be equipped with a continuous monitoring devices which are installed, calibrated, maintained, and operated according to vendor's specifications at all times that the afterburners are in use. These devices shall monitor the afterburner combustion chambers temperature.
 - d. Materials covered with polyvinyl chloride or asbestos, or scrap containing the fuming metals tin, zinc, or lead shall not be charged to the oven.
7. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
 8. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including material handling or storage activity, beyond the property line of the emission source, pursuant to 35 Ill Adm. Code 212.301.
 9. The Permittee shall maintain the following records:
 - a. Name, Usage (gallons/month and gallons/year), VOM and HAP contents (lb/gallon or % weight), and VOM and HAP emissions (lb/month and tons/year) for the following materials:
 - i. Adhesives and Adhesive Films;
 - ii. Fiber Glass Wool Insulation;
 - iii. Nylon Fabric
 - iv. Wood Mats; and
 - v. Solvents;
 - b. Natural Gas Usage (mmscf/month and mmscf/year); and
 - c. Amount of plastic processed by the grinders (tons/month and tons/year).
 10. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry, unless otherwise specified, and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
 11. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall

submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

12. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

If you have any questions on this permit, please call Eric Jones at 217/782-2113.

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

DES:EEJ:psj

cc: Illinois EPA, FOS Region 3
USEPA

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the interior Automotive parts manufacturing, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario, which results in maximum emissions from such a plant. This is done through the limited VOM and HAP Usage of the VOM and HAP containing materials. The resulting maximum emissions are well below the levels, 10 tons per year of a single HAP and 25 tons per year of combined HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, coatings used and control measures are more effective than in this permit.

<u>Equipment/Process</u>	EMISSIONS (Tons/yr)						
	<u>PM</u>	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP^A</u>	<u>HAPs^B</u>
two package tray, Headliner production, Wood fibers substrate parts line, and seat frame production lines (Total)	2.20	-	-	-	7.51	4.50	7.51
2 Plastic Grinders (Total)	0.88	-	-	-	-	-	-
Burn-off Process (Total)	0.88		0.88		0.88		
Natural Gas Combustion Units (Total)	0.16	2.15	1.81	0.02	0.12		
Total	4.12	2.15	2.69	0.02	8.51	4.50	7.51

^A Single Hazardous Air Pollutant (i.e. Phenol)

^B Total Combined Hazardous Air Pollutants

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I. INTRODUCTION

Intier Automotive has voluntarily submitted an application for a Federally Enforceable State Operating Permit for the interior automotive parts manufacturing plant. These limits would prevent the coating operation from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The permit would contain conditions to assure that the facility is operated as a non-major source. These conditions would be enforceable by both the USEPA and the Illinois EPA.

II. PROJECT DESCRIPTION

Intier Automotive manufactures interior parts for the automotive industry. The facility uses various materials that contain volatile organic materials (VOM) and hazardous air pollutants (HAPs).

III. EMISSIONS

The principal air contaminant emitted from the manufacturing lines is VOM and HAPs. The VOM and HAPs emissions from these emission units are based on complete volatilization of the VOM and HAPs contents of the materials.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board emission standards. The Board's emission standard represents the basic requirements for sources in Illinois. The Board has standards for sources of VOM. Intier Automotive complies with all applicable standards through direct compliance.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this source will be operated as a non-major source. This permit sets limitations on the material VOM usage and emissions. These limitations are consistent with the historical operation. The VOM emissions are based on the amount of material used.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the plant is operating within the limitations set by the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this project.

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The Illinois EPA and the proposed condition of the draft permit request comments on this proposed action. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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