

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	6
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	8
5.0 OVERALL SOURCE CONDITIONS	9
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NOT APPLICABLE TO THIS PERMIT	14
7.0 UNIT SPECIFIC CONDITIONS	15
7.1 Unit 01 Plastic parts coating	
8.0 GENERAL PERMIT CONDITIONS	22
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

- 8.4 Operational Flexibility/Anticipated Operating Scenarios
- 8.5 Testing Procedures
- 8.6 Reporting Requirements
- 8.7 Obligation to Comply with Title I Requirements

	<u>PAGE</u>
9.0 STANDARD PERMIT CONDITIONS	27
9.1 Effect of Permit	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirements for Compliance Certification	
9.9 Certification	
9.10 Defense to Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening And Reissuing Permit For Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	
10.0 ATTACHMENTS	
10.1 Attachment 1 - Emissions of Particulate Matter from New Process Emission Units	1-1
10.2 Attachment 2 - Example Certification by a Responsible Official	2-1
10.3 Attachment 3 - Guidance on Revising This Permit	3-1
10.4 Attachment 4 - Form 199-CAAPP, Application For Construction Permit (For CAAPP Sources Only)	4-1

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

1.0 SOURCE IDENTIFICATION

1.1 Source

North American Lighting, Inc.
1875 West Main Street
Salem, Illinois 62881
618/662-4483

I.D. No.: 121813AAG
Standard Industrial Classification: 3647, Vehicular Lighting
Equipment Manufacturer

1.2 Owner/Parent Company

North American Lighting, Inc.
20 Industrial Park
Flora, Illinois 62839

1.3 Operator

North American Lighting, Inc.
1875 West Main Street
Salem, Illinois 62881

Steve Abbott
618/662-4483

1.4 General Source Description

The Salem facility for North American Lighting, Inc. (NAL) manufactures exterior rear and secondary lighting for the automobile industry. Examples of this type of lighting would be tail lights, signal lights, high mount stop lights, license plate lights and other decorative lighting found on the outside of your automobile. NAL manufactures the complete light assembly and supplies it directly to the automobile manufacturer.

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CAM	Compliance Assurance Monitoring
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	Kilowatts
lb	Pound
mmBtu	Million British thermal units
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
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T	Tons
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
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:

None

- 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:

1 Solventless Mask Washer (Stack 55)
2 Electric Anneal Ovens (Stacks 26, 79)
5 Electric Curing Ovens (Stacks 50, 51, 52, 53, 56)
1 20% Caustic Cleaning Tank (Stack 58)
30 Plastic Material Dryers (Stacks 70, 71, 77, 78)
1 Battery Charge Vent (Stack 68)
1 Maintenance Welding Vent (Stack 69)
2 Gas Cure Ovens (Stacks 93, 99)
15 Gas Anneal Ovens (Stacks 94, 96, 100 to 113)
1 Mask Washer (Stack 95)
1 Electric Anneal Oven (Stack 97)
1 Exhaust Hood (Stack 98)
2 Mask Washers (Stacks 117, 118)
1 Curing Oven (Stack 121)
16 Gas Anneal Ovens (Stacks 59, 122 to 133, 134, 136, 137, 138)

- 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)].

36 Natural Gas Fired Area Heaters

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

4 Emergency Power Generators

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

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), 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).

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

- 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).

FINAL DRAFT/PROPOSED CAAPP PERMIT
 North American Lighting, Inc.
 I.D. No.: 121813AAG
 Permit Number: 96030179
 July 11, 2001

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Stack Number	Date Constructed
01	Argent Paint Room Booths #1 thru #6	1 to 6	1987
	Finishing Units #1 thru #12	28, 32, 33, 72, 74, 75, 76	1987
	Finishing Units #80 thru #90	81, 84	1997
	Five Paint Spray Booths (66L Booths I and II, Stand Alone Booth, Cell Booth, Recirculating Booth).	91, 92, 114, 115, 116	2000
	Body Color Paint Room Booths #1, #2	119, 120	2000
	QW Paint Booth	139	2001
	DN-101 Two Paint Booths	61, 62, 63	1996
	Garnish Room Room #1, #2, #3, #4 (3 Booths In Each Room)	38 to 49	1987

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 HAPs.

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. 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 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

None

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)	94.0
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	0.1
Nitrogen Oxides (NO _x)	---
HAP, not included in VOM or PM	---
Total	94.1

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 should contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

5.9.1 General Procedures for Calculating VARIABLE 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.

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Plastic parts coating units

7.1.1 Description

The Salem facility for North American Lighting, Inc. (NAL) manufactures exterior rear and secondary lighting for the automobile industry. Examples of this type of lighting would be tail lights, signal lights, high mount stop lights, license plate lights and other decorative lighting found on the outside of your automobile.

The lenses manufactured at NAL are molded from either polycarbonate or acrylic. This process uses an injection molding machine. The machine first melts the plastic pellets into a liquid and then injected it into a mold where the lens is shaped. The mold is then cooled and the plastic hardens in the shape of the lens. Emissions are insignificant from this process.

Some of the lenses go directly to assembly and used on products. Some require coating for decorative purposes and others for UV and/or scratch protection. These lenses will first receive a process called annealing and is a heat curing process. This will harden the plastic and protect it from cracking when it comes into contact with paint. The oven is usually around 150 degrees F and no emissions are emitted from this process.

The next step for some of the lenses is to be coated. This is a typical painting process that is either robot or hand sprayed. This is followed by oven cure at around 150 degrees F which dries the paint. Once the lenses are dried they are transferred to the Assembly Department.

The reflectors molded at NAL are plastic, such as ABS, polycarbonate, etc. Once molded the reflector is then painted on the inside to obtain the reflective surface needed for the lamp to function properly. The painting process consists of either robot or hand spray. Air dry paint is used so a heated curing process is not used. Once coated the reflectors are transported to the Assembly department.

Some of the reflectors are painted with a clear coating. These are then vacuum metallized with aluminum. A silicone layer is added over the aluminum to protect it

from corrosion. Both are completed in a vacuum process. Emissions are insignificant from this process. A special filter system is used to capture any possible oil or by-products from the metallizing process. After this process the metallized reflectors are transported to Assembly department.

There is one supporting process with metallizing. It is a caustic dip to clean the planets or carriers that hold the reflectors in the metallizer. Once thoroughly coated with aluminum the planets are removed and transported to an area where they are dipped in a 10% solution of sodium hydroxide for about 30 minutes. The cleaned, but wet planets are then dried in an oven at 150 degrees F for about one hour.

The production of both the housings and brackets are a simple injection molding process. Emissions are insignificant from these processes. Brackets that are made of metal are purchased from an outside source.

The final step in the production of a lamp assembly occurs in the Assembly department. The lens is attached to the reflector usually with the application of hot melt glue. There is a few that use polyurethane glue. This type of glue requires a post curing oven at about 200 degrees F.

Once the lens and reflector are attached then any additional brackets, housings or other supporting fixtures are attached by screws or snaps, etc. Some require a rubber edging that fits between the lamp assembly and the automobile. This rubber edging is usually attached with a Cyanoacrylate adhesive. Little to no emissions occur in the Assembly department.

7.1.2 List of Emission Equipment and Pollution Control Equipment:

Description	Stack Number	Date Constructed
Argent Paint Room Booths #1 thru #6	1 to 6	1987
Finishing Units #1 thru #12	28, 32, 33, 72, 74, 75, 76	1987
Finishing Units #80 thru #90	81, 84	1997

FINAL DRAFT/PROPOSED CAAPP PERMIT
 North American Lighting, Inc.
 I.D. No.: 121813AAG
 Permit Number: 96030179
 July 11, 2001

Five Paint Spray Booths (66L Booths I and II, Stand Alone Booth, Cell Booth, Recirculating Booth).	91, 92, 114, 115, 116	2000
Body Color Paint Room Booths #1, #2	119, 120	2000
QW Paint Booth	139	2001
DN-101 Two Paint Booths	61, 62, 63	1996
Garnish Room Room #1, #2, #3, #4 (3 Booths in Each Room)	38 to 49	1987

Each of the units uses a filter to collect overspray of the coating.

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected plastic parts coating unit" for the purpose of these unit specific conditions, is an emission unit described in conditions 7.1.1 and 7.1.2.
- b. The affected plastic parts coating unit 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 (see also Attachment 1)[35 IAC 212.321(a)].

- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Sections 218.302, 218.303, 218.304 of this Part 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].

7.1.4 Non-Applicable Regulations of Concern

- a. The affected plastic parts coating unit is not subject to 35 IAC 215 Subpart F, Emissions of Volatile Organic Material from coating operations, because the affected process emission unit applies coatings on plastic parts.
- b. This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected plastic parts coating unit does not have potential pre-control emissions of PM that equals or exceeds major source threshold levels.

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

7.1.5 Operational and Production Limits and Work Practices

N/A

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the affected plastic parts coating unit is subject to the following:

Note: The provision of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD) does not apply as this source is major only for HAPS.

The following limitations contain revisions to previously issued Permits. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of the permits, consistent with the information provided in the CAAPP application.

- a. Emissions of VOM from the following units shall not exceed the corresponding limits:

Emission Sources	Total VOM Emissions (Lb/Hr)(T/Yr)	
Paint Booths #1 Thru #6. Permit #87050055	8.0	16.0
Finishing Units #1 Thru #12. Permit #91030020	7.5	5.0
Note: Only Seven Units are Being Used Stacks #28, 32, 33, 72, 74, 75, and 76		
Finishing Units #80 Thru #90. Permit #97030118	3.0	3.0
Note: Only Two Units are Being Used. Stacks #81 and #84		
Five Paint Spray Booths (66L Booths I and II, Stand Alone Booth, Cell Booth, Recirculating Booth). Permit #99020045	6.0	14.0
Two Body Color Paint Room Booths. Stacks #119 and #120. Permit #00060046	2.0	8.0
QW Paint Booth (Stack 139). Permit #00120008	1.0	3.0
DN 101 Two Paint Booths. Stacks #61 and #62	6.0	20.0
Garnish Room. Stacks #38 to #49	9.0	25.0

These limits are based on the maximum material usage and the maximum VOM content indicated in the permit application [T1R].

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

- 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) [T1R].

7.1.7 Testing Requirements

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 215.208 and Section 39.5(7)(b) of the Act]

Upon reasonable request by the Illinois EPA, the VOM and HAP content of specific coatings and cleaning solvents used on each affected paint booth or finishing unit shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.208.

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 7.1.9.

7.1.8 Inspection Requirements

Filters to collect over spray shall be visually inspected for proper operation.

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each affected plastic part coating unit to demonstrate compliance with this section, pursuant to Section 39.5(7)(b) of the Act:

- a. i. The name and identification number of each coating, thinner, and cleaning solution as applied on each affected plastic parts coating unit.
- ii. The usage of each coating, thinner, and cleaning solution in units of gallons/month.
- iii. The weight of VOM and HAP per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each month on each affected plastic parts coating unit.
- iv. The aggregate monthly and annual VOM and HAP emissions from the affected plastic parts

coating unit based on the coating, thinner, and cleaning solution usage and VOM and HAP content, and with supporting calculations.

- v. If credit is desired for VOM and HAP emissions from waste materials, aggregate records of materials disposed of or recycled shall be maintained for all coatings, cleaning solvents, and any other VOM containing material use on the affected plastic parts coating unit on a monthly basis.
- b. Records of the testing of VOM and HAP content (in wt%) of each coating and cleaning solvent 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; and
 - iv. Person performing analysis.
- c. The operating schedule of the affected plastic parts coating unit.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected plastic parts coating unit as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Emissions of VOM from affected plastic parts coating unit in excess of the limits specified in Condition 7.1.3(c) and 7.1.6 within 30 days of knowledge of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected plastic parts coating unit without prior notification to the Illinois EPA or revision of this permit. This condition

FINAL DRAFT/PROPOSED CAAPP PERMIT

North American Lighting, Inc.

I.D. No.: 121813AAG

Permit Number: 96030179

July 11, 2001

does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.1.7, the source wide emission limitations in Condition 5.5 and 7.1.6 are not exceeded and the affected plastic parts coating unit remains in compliance with Condition 7.1.3.

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter emission limits in condition 7.1.3(b) is assured and achieved by the regular inspection and replacement of the filters as required by this section and the work-practices inherent in operation of the affected plastic parts coating unit.
- b. Compliance with the VOM emission limits in Conditions 5.5, 7.1.3(c) and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of the formulae listed below:

VOM = Coating, thinner, and cleaning solution Usage
(gal) x Density (lb/gal) x VOM Content (% by wt.)

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 _____ **{insert public notice start date}** (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].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

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
2009 Mall Street
Collinsville, Illinois 62234
 - 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.

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

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

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

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 Emissions of Particulate Matter from New Process Emission Units

10.1.1 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, 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)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

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

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

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/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):

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/hr
A	11.42	24.8

FINAL DRAFT/PROPOSED CAAPP PERMIT
 North American Lighting, Inc.
 I.D. No.: 121813AAG
 Permit Number: 96030179
 July 11, 2001

Metric		English	
P	E	P	E
Mg/hr	kg/hr	ton/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.2	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

10.2 Attachment 2 - 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: _____

10.3 Attachment 3 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application

of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA

FINAL DRAFT/PROPOSED CAAPP PERMIT
North American Lighting, Inc.
I.D. No.: 121813AAG
Permit Number: 96030179
July 11, 2001

reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
 Division Of Air Pollution Control -- Permit Section
 P.O. Box 19506
 Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application	

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.					
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:				
BY:	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border-bottom: 1px solid black; text-align: center;">AUTHORIZED SIGNATURE</td> <td style="width: 50%; border-bottom: 1px solid black; text-align: center;">TITLE OF SIGNATORY</td> </tr> <tr> <td style="border-bottom: 1px solid black; text-align: center;">TYPED OR PRINTED NAME OF SIGNATORY</td> <td style="border-bottom: 1px solid black; text-align: center;">/ / DATE</td> </tr> </table>	AUTHORIZED SIGNATURE	TITLE OF SIGNATORY	TYPED OR PRINTED NAME OF SIGNATORY	/ / DATE
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY				
TYPED OR PRINTED NAME OF SIGNATORY	/ / DATE				

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Salem facility for North American Lighting, Inc. (NAL) manufactures exterior rear and secondary lighting for the automobile industry. Examples of this type of lighting would be tail lights, signal lights, high mount stop lights, license plate lights and other decorative lighting found on the outside of your automobile. NAL manufactures the complete light assembly and supplies it directly to the automobile manufacturer.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Stack Number	Date Constructed
01	Argent Paint Room Booths #1 thru #6	1 to 6	1987
	Finishing Units #1 thru #12	28, 32, 33, 72, 74, 75, 76	1987
	Finishing Units #80 thru #90	81, 84	1997
	Five Paint Spray Booths (66L Booths I and II, Stand Alone Booth, Cell Booth, Recirculating Booth).	91, 92, 114, 115, 116	2000
	Body Color Paint Room Booths #1, #2	119, 120	2000
	QW Paint Booth	139	2001
	DN-101 Two Paint Booths	61, 62, 63	1996
	Garnish Room Room #1, #2, #3, #4 (3 Booths in Each Room)	38 to 49	1987

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	94.0
Sulfur Dioxide (SO ₂)	---

Particulate Matter (PM)	0.1
Nitrogen Oxides (NO _x)	---
HAP, not included in VOM or PM	---
Total	94.1

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant

Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the 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.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. 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 164.

MJP:jar