217/782-2113

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT [1]

PERMITTEE

Meyer Steel Drum, Inc.
Attn: Denise Jones
3201 South Millard Avenue
Chicago, Illinois 60623

Application No.: 95120079 I.D. No.: 031600APY
Applicant's Designation: Date Received: December 5, 1995
Operation of: Reconditioned Steel Containers
Date Issued: February 9, 2000 Expiration Date: February 8, 2005
Source Location: 3201 South Millard Avenue, Chicago, Cook County
Responsible Official:

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

If you have any questions concerning this, please call Anatoly Belogorsky at 217/782-2113.

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

DES:AB: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.

TABLE of CONTENTS

PAGE

1.0 SOURCE IDENTIFICATION 4

1.1 Source
1.2 Owner/Parent Company
1.3 Operator
1.4 General Description of Source

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT 5

3.0 INSIGNIFICANT ACTIVITIES 7

3.1 Identification of Insignificant Activities at the Source
3.2 Compliance with Applicable Requirements
3.3 Addition of Insignificant Activities

4.0 SIGNIFICANT EMISSION UNITS AT THE SOURCE 10

5.0 OVERALL SOURCE CONDITIONS 11

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 EMISSION REDUCTION MARKET SYSTEM (ERMS) 18

6.1 Description of ERMS
6.2 Applicability
6.3 Obligation to Hold Allotment Trading Units
6.4 Market Transaction
6.5 Emission Excursion Compensation
6.6 Quantification of Seasonal VOM Emissions
6.7 Annual Account Report
6.8 Allotment of ATUs to the Source
6.9 Recordkeeping for ERMS

6.10 Federal Enforceability
6.11 Exclusion from Further Reduction

PAGE

7.0 UNIT SPECIFIC CONDITIONS 25

7.1 Coating Lines
7.2 Drum Reclamation Furnace
7.3 Shot Blasters
7.4 Natural Gas-Fired Boiler
7.5 Plastic Drum Shredder

8.0 GENERAL PERMIT CONDITIONS 45

8.1 Permit Shield
8.2 Applicability of Title IV Requirements
8.3 Emissions Trading Programs
8.4 Operational Flexibility/Anticipated Operating Scenarios
8.5 Testing Procedures
8.6 Reporting Requirements
8.7 Obligation to Comply with Title I Requirements

9.0 STANDARD PERMIT CONDITIONS 50

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 Requirement 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. ATTACHMENTS

10.1 Attachment 1: Allowable Emissions of Particulate Matter 1-1

10.2 Attachment 2: Example Certification by a Responsible Official 2-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, Illinois 60623
312/376-8376

I.D. No.: 031600APY
Standard Industrial Classification: 3412, Metal Barrels, Drums & Pails

1.2 Owner/Parent Company

Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, Illinois 60623

1.3 Operator

Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, Illinois 60623

Contact Person's Name:
John Dinella
312/376-8376

1.4 General Source Description of Source

Meyer Steel Drum, Inc. is located at 3201 South Millard Avenue in Chicago and reconditions and recycles industrial shipping containers. Coatings are used to provide a durable, protective finish that resist weathering, abrasion, impacts, and in the case of interior linings, provide chemical resistance to the contents of the container. Drums are cleaned to remove residue either in drum furnaces or by caustic wash. The method chosen depends on the residue material and type of drum. Drums are then shot blasted to complete the cleaning process and finally coated.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
EC	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
EF	degrees Fahrenheit
ft	feet
ft^3	cubic foot
g	grams
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant
Hp	Horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
lb	pound
LEL	Lower Explosive Limit
m	meter
MACT	Maximum Achievable Control Technology
MBtu	Million Btus
mg	milligrams
MW	Megawatts
NSPS	New Source Performance Standards
NO_x	Nitrogen Oxides
PIMW	Potentially Infectious Medical Wastes
PM	Particulate Matter
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
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
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
Wt	weight
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:

Oil Storage Tanks #2, #7 and #8
Wash/Dip Tank
Drum Preheater
Drum Interior Washers
Drum Exterior Washer
Rinse Tanks
Cleaning Tank
Rust Inhibitor Tank

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:

Flame Treat Unit
Dent Removers
Chime Straighteners
Ring Straightener
Lid Straightener
Testing Area
Horizontal and Vertical Drum Coolers
Vacuum Emptying
Rinse Tank
Oil Tank
Process Tanks for Caustic Detergent Recycling
Tight Head Assembly Equipment
Leak Testers
Food Drum Washer
Vacuum System
Purge Unit
Semi Auto Leak Tester

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 MBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 MBtu/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

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 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	Equipment	Description	Emission Control Equipment
Group 1	Coating Lines	Coating Line #1 (Interior Coating Line with Spray Booth SPB-1 and Steam Flash Oven FO-1)	Filter (AF-1)
		Coating Line #2 (Primer Coating Line with Coating Booth SPB-2 and Curing Oven CO-1)	Filter (AF-2)
		Coating Line #3 (Exterior Coating Line with Coating Booth SPB-3 and Curing Oven CO-2)	Filter (AF-3)
		Coating Line #4 (Interior Coating Line with Spray Booth SPB-4 and Steam Flash Oven CO-1)	Water Wall (WW-1)
		Coating Line #5 (Exterior Coating Line with Coating Booth SPB-5 and Curing Oven CO-2)	Water Wall (WW-2)
		Coating Line #6 (Exterior Coating Line with Coating Booth SPB-6 and Curing Oven CO-3)	Filter (AF-4)
		Coating Line #7 (Ring Dip Coating Line with Dip Cater DC-1 and Curing Oven CO-2)	None
Group 2	Drum Reclamation Furnace	Natural Gas-Fired Drum Cleaning Reclamation Furnace DRF-1	Afterburner (AB-1)
Group 3	Shot Blasters	Shot Blasters 1-4 (SB-1 Through SB-4) for Removing Scales	Fabric filter for each shot blaster
Group 4	Natural Gas-Fired Boiler	Maximum Heat Input Capacity: 12 mmBtu/hr	None
Group 5	Plastic Drum Shredder	Shredding Plastic Drums	Cyclone separator with a baghouse

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 VOM and HAP's 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 emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. 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, pursuant to 35 IAC 212.310 and 212.312.

c. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minutes period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any such emission unit owned or operated by the Permittee and provided further that such more opaque emissions permitted from each such emission unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).

5.2.3 Gasoline Storage Tank

a. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 218.122(b)].

b. Pursuant to 35 IAC 218.583(a), the transfer of gasoline from any delivery vessel into the stationary storage tank at a gasoline dispensing operations shall include the following:

i. The tank is equipped with a submerged loading pipe.

ii. The vapors displaced from the storage tank during filling and processed by a vapor control system that includes one or more of the following:

A. A vapor collection system that meets the requirements of 35 IAC 218.583(d)(4).

B. A refrigeration-condensation system or any other system approved by the USEPA as a SIP revision, that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled.

C. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 218.584(b) or (d).

iii. All tank vent pipes are equipped with pressure/vacuum relief valves and shall be set to resist a pressure of at least 3.5 inches water column to resist a vacuum of no less than 6.0 inches water column.

5.2.4 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.

5.2.5 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.6 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

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)	105.21
Sulfur Dioxide (SO_2)	0.03
Particulate Matter (PM)	22.32
Nitrogen Oxides (NO_x)	8.74
HAP, not included in VOM or PM	---
TOTAL	136.30

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emissions for HAP 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

The VOM emissions from the source-wide coating operation, i.e., spray booths SPB-1 through SPB-6 and dip coater DC-1 shall not exceed the following limits:

Pollutant	Emissions (Tons/Year)	Underlying Rules
VOM	97.7	35 IAC Part 203

The above limitations were established in a Federally Enforceable State Operating Permit 90060034, 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]. Compliance with annual limits shall be determined based on the recordkeeping requirements

established in Section 7 of this permit and from a running total of 12 months of data.

5.6 General Recordkeeping Requirements

5.6.1 Emission records

The Permittee shall keep and maintain records of total emissions on a calendar year basis for the equipment covered by unit-specific conditions (Section 7) to demonstrate compliance with Conditions 5.5.1 and 5.5.3.

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 noncompliance 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 Allowable Emissions

Compliance with the source-wide emission limits specified in Conditions 5.5.1 and 5.5.3 shall be based on the recordkeeping and reporting requirements, and Compliance Procedures in Section 7 (Unit-Specific Conditions) of this permit.

Total VOM emissions from the source-wide coating operations, i.e., spray booths SPB-1 through SPB-6 and dip coater DC-1 shall be calculated based on the following:

$$E_T = E_C + E_O$$

Where:

E_T = Total VOM emissions, pounds/month

E_C = VOM emissions from all coatings, pounds/month

E_O = VOM emissions from all other VOM-containing materials (e.g., cleanup solvents), pounds/month,

and

$$E_C = \sum_{i=1}^{n} U_i V_i - \left(\begin{array}{c}\text{Sludge Generated x VOM} \\ \text{Content of Sludge}\end{array}\right)$$

Where:

U_i = Usage of coating i, gallons/month

V_i = Overall VOM content of coating i, pounds VOM/gal

and the summation ' is over all coatings i; and

$$E_O = \sum_{j=1}^{n} U_j V_j - \left(\begin{array}{c}\text{Material Reclaimed x VOM} \\ \text{Content of Material} \\ \text{Reclaimed}\end{array}\right)$$

Where:

U_j = Usage of VOM-containing material j, pounds/month

V_j = VOM content of VOM-containing material j, weight percent

and the summation ' is over all VOM-containing materials j (other than coatings).

5.9.2 Compliance with the emission limits established in Conditions 5.5.1 and Section 7 of this permit for natural gas-fired emission units shall be based on the recordkeeping requirements in Section 7 and the emission factors and formulas listed below:

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 MBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March 1998.

Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

6.0 EMISSION 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. Under the ERMS, 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 during initial issuance of the sources’ CAAPP permit. These allotments are established from historical VOM emissions or “baseline emissions” lowered to provide the emission reduction 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 emission reductions from an Emission 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” (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 source is considered a “participating source” for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to “emissions excursion compensation,” as described in Condition 6.5.

i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Section 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior

to conducting any market transactions, as specified at 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation to the Illinois EPA in accordance with the following:

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the

amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

i. An initial emergency condition report within two days after the time when such excess emissions occurred due to the emergency; and

ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 307 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 34.845 tons per season.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the

initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units.

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units for which three years of operational data is not yet available:

None

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusion from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

1. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

2. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and

3. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Natural gas-fired boilers and ovens (Group 5 of this permit)

b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirements specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Coating Lines

7.1.1 Description

The Permittee is a reconditioner of steel drums. After preliminary cleaning operation, coating operations are conducted with paint spray booths and bake(curing) ovens.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Coating Lines Dates of Construction: April-August 1991	Coating Line #1 (Interior Coating Line with Spray Booth SPB-1 and Steam Flash Oven FO-1)	Filter (AF-1)
		Coating Line #2 (Primer Coating Line with Coating Booth SPB-2 and Curing Oven CO-1)	Filter (AF-2)
		Coating Line #3 (Exterior Coating Line with Coating Booth SPB-3 and Curing Oven CO-2)	Filter (AF-3)
		Coating Line #4 (Interior Coating Line with Spray Booth SPB-4 and Steam Flash Oven CO-1)	Water Wall (WW-1)
		Coating Line #5 (Exterior Coating Line with Coating Booth SPB-5 and Curing Oven CO-2)	Water Wall (WW-2)
		Coating Line #6 (Exterior Coating Line with Coating Booth SPB-6 and Curing Oven CO-3)	Filter (AF-4)
		Coating Line #7 (Ring Dip Coating Line with Dip Cater DC-1 and Curing Oven CO-2)	None

7.1.3 Applicability Provisions and Applicable Regulations

a. An "affected coating line" for the purpose of these unit specific conditions is a coating operation that includes spray coating booth (or dip coater) and curing/flash oven which is used to apply coatings to drums, lids, and rings.

b. The exterior coating lines, primer coating line and ring dip coating line (coating lines #2, 3, 5, 6 and 7) at the source are subject to 35 IAC 218.204 (j)(2)(B) for Miscellaneous Metal Parts

and Products Coating for extreme performance coating 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 extreme performance. 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:

kg/l	lb/gal
0.4	3.3

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.

c. The interior coating lines (coating lines #1 and 4) at the source are subject to 35 IAC 218.204 (j)(3) for Miscellaneous Metal Parts and Products Coating for steel pail and drum interior coating 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 steel pail and drum interior. 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:

kg/l	lb/gal
0.52	4.3

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.

d. Each affected coating line is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced 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)].

7.1.4 Non-Applicability of Regulations of Concern

a. Each affected coating line is not subject to 35 IAC Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes affected coating line from this requirement.

b. Each affected coating line is not subject 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.

c. Each affected coating line is not subject 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.

7.1.5 Operational and Production Limits and Work Practices

The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.

7.1.6 Emission Limitations

In addition to Conditions 5.2.2 and 5.5.1 the affected coating lines are subject to the following:

The VOM emissions from the source-wide coating operation, i.e., spray booths SPB-1 through SPB-6 and dip coater DC-1 shall not exceed the following limits:

Pollutant	Emissions (T/mo) (T/Year)	Underlying Rules

VOM	12.0 97.7	35 IAC Part 203

The above limitations were established in Federally Enforceable State Operating Permit 90060034, 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]. Compliance with annual limits shall be determined based on the recordkeeping requirements established in Section 7 of this permit and from a running total of 12 months of data.

7.1.7 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 the affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).

a. The VOM content of representative coatings “as applied” on the affected coating line shall be determined according to USEPA Reference Method 24 of 40 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 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent; and

c. The percent concentration of solvent in the VOM containing waste from the affected coating line shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Conditions 5.5.1, 5.5.3, 7.1.3, and 7.1.6 of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. The name and identification number of each coating as applied on the affected coating line;

b. Total usage of each coating, in units of gallons/month and gallons/year, as applied on coating lines ##1, 2, 3, 4, 5, 6 and 7.

c. 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;

d. Density of each applied coating and cleanup solvent, in units lb/gal;

e. The usage of clean-up solvent, in units of gallons/month and gallons/year:

   Total usage of clean-up solvents, in units of gallons/month and gallons/year, as applied on coating lines ##1, 2, 3, 4, 5, 6 and 7.

f. Total amount of HAPs applied on the affected coating line in lb/mo and tons/year.

g. The amount of paint sludge and solvent sent offsite for reclamation or disposal, in units gallons/month and gallons/year:

   Cleanup solvent reclaimed for coating lines ##1, 2, 3, 4, 5 and 7 could be combined.

h. The average density in lb/gal and Wt.% of VOM in generated waste and solvent reclaimed;

i. Total VOM emissions in tons/month and tons/year from affected coating line calculated based on the recordkeeping requirements and compliance procedures from Condition 5.9.1; and

j. Records of the testing of VOM and HAP content of each coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:

A. Identification of material tested;

B. Results of analysis;

C. Documentation of analysis methodology; and

D. Person performing analysis.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

a. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3 within 30 days of such an occurrence.

b. The Permittee shall notify the Illinois EPA of any record showing violation of Conditions 5.5.1, 5.5.3, and 7.1.6 within 30 days 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 coating line without prior notification to the Illinois EPA or revision of this permit. This condition 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 and clean-up solvents at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section, the source wide emission limitations in Conditions 5.5.1 and 5.5.3 are not exceeded and the affected coating line remains in compliance with Conditions 7.1.3 and 7.1.6.

7.1.12 Compliance Procedures

a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of an affected coating line.

b. Compliance of the affected coating line with VOM emission limitations in Condition 7.1.3(b) and (c) shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formula listed below:

VOM Coating Content = V x D/[1 - W x 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, lb/gal

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

c. Compliance of the affected coating line with VOM emission limitations in Conditions 5.5.1, 5.5.3, and 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and Compliance Procedures from Condition 5.9.1.

7.2 Group 2: Drum Reclamation Furnace

7.2.1 Description

The open head drums prior to their coating application are cleaned to remove residue in the drum reclamation furnace.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 2	Drum Reclamation Furnace	Natural Gas-fired Drum Cleaning Reclamation Furnace DRF-1 Date of Construction: 1991	Afterburner (AB-1)

7.2.3 Applicability Provisions and Applicable Regulations

a. An "affected drum reclamation furnace" for the purpose of these unit specific conditions is a drum cleaning furnace.

b. The affected drum reclamation furnace is subject to the limits identified in Condition 5.2.2.

c. The affected drum reclamation furnace is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced 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)].

d. The affected drum reclamation furnace at the source is subject to 35 IAC 218.301 which requires that:

The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from an

affected drum reclamation furnace. If no odor nuisance exists the limitation shall apply only to photochemically reactive material as defined in 35 IAC 211.4690.

7.2.4 Non-Applicability of Regulations of Concern

a. The affected drum reclamation furnace is not subject 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected drum reclamation furnace is not by definition a fuel combustion emission unit.

b. The affected drum reclamation furnace is not subject 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected drum reclamation furnace is not by definition a fuel combustion emission unit.

7.2.5 Operational and Production Limits and Work Practices

a. i. The secondary combustion chamber (afterburner) of the affected furnace shall be preheated to the manufacturer's recommended temperature but not lower than 1600EF prior to introducing drums into the furnace.

ii. This temperature shall be maintained until burnout of residue from the drums in the primary chamber is completed.

b. No drums which were used to contain pesticides, fungicides, or insecticides shall be fed in the drum reclamation furnace.

c. The operation of the drum reclamation furnace shall not exceed 3,000 hours/year.

d. The process weight rate (drums fed) of the drum reclamation furnace shall not exceed the following limits:

Process Weight Rate	
(Drums/hr)	(Drums/yr)
480	1,440,000

The annual rate is based on the maximum hourly rate and a maximum annual operation of 3,000 hours/year.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Conditions 5.5.1 and 5.5.3, the affected furnace is subject to the following:

Emissions of VOM and PM from the affected drum reclamation furnace (process emissions) shall not exceed the following limits:

VOM Emissions		PM Emissions	
(Lb/hr)	(T/yr)	(Lb/hr)	(T/yr)
5.0	7.5	6.6	9.9

The above limitations were established in Construction Permit 91040073, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1]. Compliance with annual limits shall be determined based on the recordkeeping requirements established in Section 7 of this permit and from a running total of 12 months of data.

7.2.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the VOM and PM emissions from the affected drum reclamation furnace shall be determined according to USEPA Reference Methods 25 and 5 respectively of 40 CFR 60 Appendix A.

7.2.8 Monitoring Requirements

a. An afterburner of the affected drum reclamation furnace shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage.

b. The condition of the affected drum reclamation furnace shall be inspected on a periodic basis for the presence of any deficiencies.

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected drum reclamation furnace to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. The afterburner combustion temperature during the time of operation;

b. Number of drums charged into the furnace (drums/hr and drums/yr);

c. Inspection maintenance logs for the drum reclamation furnace, with dates of inspection, maintenance, repair, or other actions completed;

d. Operating hours of the drum reclamation furnace (hr/year); and

e. Total VOM and PM emissions in tons/month and tons/year from affected drum reclamation furnace calculated based on the recordkeeping requirements and compliance procedures from Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Operation of the afterburner combustion chamber with a temperature below 1600EF or below manufacturer’s recommended temperature.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

a. Compliance with the particulate matter emission limitations in this section is assured and achieved by the work-practices inherent in operation of the affected furnace and emissions calculation based on the emission rate of 3.23 lb/hr demonstrated during stack testing conducted on December 13 and 14, 1991.

b. Compliance with the VOM emission limitations in this section is assured and achieved by the work-

practices inherent in operation of the affected furnace and emissions calculation based on the emission rate of 3.21 lb/hr demonstrated during stack testing conducted on December 13 and 14, 1991.

c. Emission factors established in Conditions 7.2.12(a) and (b) are no longer applicable for determining compliance with emission limits of this permit if the Permittee exceeds operational and production limits established in Condition 7.2.5. New emission factors shall be created based on the retesting of the affected drum reclamation furnace, as required by Condition 7.2.7 of this permit.

7.3 Group 3: Shot Blasters

7.3.1 Description

The Permittee is a reconditioner of steel drums. After preliminary cleaning, the drums and lids are shotblasted to remove scale.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 3	Shot Blasters	Shot Blasters 1-4 (SB-1 Through SB-4) for Removing Scales Dates of Construction: 1-3 - 1991 4 - 1993	Fabric Filter for Each Shot Blaster

7.3.3 Applicability Provisions and Applicable Regulations

a. An "affected shot blaster" for the purpose of these unit specific conditions is a shot blasting operation that includes a shot blaster controlled by a fabric filter.

b. The shot blasting operation at the source is subject to 35 IAC 212 Subpart K “Fugitive Particulate Matter”. The requirements of this subpart are listed in Section 5.2.2 (a) and (b).

7.3.4 Non-Applicability of Regulations of Concern

Each affected shot blaster is not subject to 35 IAC 212.321, “Particulate Matter Emissions from New Process Emission Sources”, pursuant to 35 IAC 212.681.

7.3.5 Operational and Production Limits and Work Practices

The Permittee shall operate and maintain the fabric filters, including periodic inspection, routine maintenance and prompt repairs of defects if any that assures compliance with conditions of this permit.

7.3.6 Emission Limitations

None

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

Records addressing use of good operating practices for the fabric filters:

a. Records for periodic inspection of the fabric filters with date, name of individual performing the inspection, and nature of inspection; and

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

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected shot blaster with 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the particulate matter emission limitations in this section is assured and achieved by the proper operation and maintenance of the fabric filters and the work-practices inherent in operation of affected shot blasters.

To determine compliance with Condition 5.5.1, emissions from the affected shot blasters shall be calculated based on the following:

PM = (Air Flow, cfm) x (Estimated Dust Loading, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [1 - (Fabric Filter Efficiency* (%)/100]

* As specified by manufacturer or vendor of the fabric filter.

7.4 Group 4: Natural Gas-Fired Boiler

7.4.1 Description

Natural gas-fired boiler is used to produce steam for heat generation at this source.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 4	Natural Gas-Fired Boiler (B-1)	Maximum Heat Input Capacity: 12 mmBtu/hr Date of Construction: 1991	None

7.4.3 Applicability Provisions and Applicable Regulations

a. An "affected boiler" for the purpose of these unit specific conditions is a steam generating unit that is fired with natural gas, with maximum heat input capacity of 100 mmBtu/hr or less, but greater than or equal 10 mmBtu/hr, and constructed, modified or reconstructed after June 9, 1989. As a consequence, the affected boiler is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc because the boiler was constructed after June 9, 1989 and the firing rate of the affected boiler is less than 100 mmBtu/hr and greater than 10 mmBtu/hr.

b. The emission of carbon monoxide (CO) into the atmosphere from the affected boiler with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.4.4 Non-Applicability of Regulations of Concern

a. The affected boiler is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of this boiler is less than 73.2 MW (250 mmBtu/hr).

b. Pursuant to 35 IAC 218.303, any fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

7.4.5 Operational and Production Limits and Work Practices

None

7.4.6 Emission Limitations

Emissions and operation of affected boiler shall not exceed the following limits:

Natural Gas Usage		NOx Emissions	
(mmscf/mo)	(mmscf/yr)	(T/mo)	(T/yr)
8.64	46.8	0.43	2.34

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the NO_x emissions from the affected boiler below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N]. Compliance with annual limits shall be determined based on the 12 months of data.

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for affected boiler to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

Total natural gas usage, in terms of scf /month (or therms/month) and scf/year (or therms/year).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control

and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

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 Agency's Compliance Unit 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.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 and 7.4.6 of this permit shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

Maximum heating capacity < 100 MBtu/hr:

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 MBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March 1998.

Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

7.5 Group 5: Plastic Drum Shredder

7.5.1 Description

The plastic drums with leaks are shredded in the plastic drum shredder. The exhaust from the drum shredder discharges through Cyclone Separator followed by a Baghouse.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 5	Plastic Drum Shredder	Shredding Plastic Drums Dates of Construction: 1996	Cyclone Separator Followed by a Baghouse

7.5.3 Applicability Provisions and Applicable Regulations

a. An "affected plastic drum shredder" for the purpose of these unit specific conditions is a shredder of drums with leaks.

b. The affected plastic drum shredder is subject to the limits identified in Condition 5.2.2.

c. The affected plastic drum shredder is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced 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)].

7.5.4 Non-Applicability of Regulations of Concern

N/A

7.5.5 Operational and Production Limits and Work Practices

The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this permit.

7.5.6 Emission Limitations

None

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

Records addressing use of good operating practices for the filters:

a. Records for periodic inspection of the filters with date, name of individual performing the inspection, and nature of inspection; and

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

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected shot blaster with 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.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the particulate matter emission limitations in this section is assured and achieved by the proper operation and maintenance of the baghouse and the work-practices inherent in operation of affected plastic drums shredder.

To determine compliance with Condition 5.5.1, emissions from the affected plastic drums shredder shall be calculated based on the following:

PM = (Air Flow, cfm) x (Estimated Dust Loading, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [1 - (Baghouse Efficiency* (%)/100]

* As specified by manufacturer or vendor of the baghouse.

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 the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after August 4, 1999 unless the 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, or 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 without applying for or obtaining an amendment to this permit, provided that the changes

do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and 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:

a. Describe the physical or operational change;

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

c. 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;

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

e. 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 process, emissions, or composition 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

A report summarizing required monitoring 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]:

Monitoring Period	Report Due Date

January - June	September 1
July - December	March 1

All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in the 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 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 on an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in the 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:

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
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency

Divisions of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA - Air Branch

United States EPA (AR - 17J)
Air & Radiation Branch (Illinois - Indiana)
77 W. 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 the 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 Clean Air Act, 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 Clean Air Act; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

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 the permit. Any permit noncompliance constitutes a violation of the Clean Air Act 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 Environmental Protection 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)] 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)(p)(ii) of Act]:

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

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, operations regulated or required under the 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 this Act.

e. Obtain and remove samples of any discharge or emission of pollutants; 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.

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

The permit does not convey any property rights of any sort, or any exclusive privilege.

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.

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 the 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 compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

a. The certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The certification shall include the identification of each term or condition of the 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 must 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 a CAAPP permit shall contain certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(k) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defenses to Enforcement Action

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 operation logs, or other relevant evidence:

i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 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 day 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 the permit.

b. This provision is in addition to any emergency or upset provisions 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 the 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 the permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

The 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

The 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 the permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of the permit; and

d. The Illinois EPA or USEPA determines that the 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)(a)(iii) 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 the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by the 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 the 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) and (n) of the Act]

10.0 ATTACHMENTS

10.1 Attachment 1

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. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

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

Where:

P = process weight rate;
E = allowable emission rate; and,

i. For process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/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 [35 IAC 212.321(c)]:

Metric		English	
P Mg/hr	E kg/hr	P T/hr	E 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 5.35	2.4	4.00	
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00

36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

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 _____

AB:psj\8