217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Federal-Mogul Corporation
Attn: Environmental, Safety, and Health Manager
7450 North McCormick Boulevard
Skokie, Illinois 60076

Application No.: 95120060 I.D. No.: 031288ABA
Applicant's Designation: Date Received: December 6, 1995
Operation of: Gasket Manufacturing
Date Issued: September 20, 1999 Expiration Date[2]: September 20, 2004
Source Location: 7450 North McCormick Boulevard, Skokie, Cook County
Responsible Official: Steve Neises, Director of Operations

This permit is hereby granted to the above-designated Permittee to OPERATE a gasket manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: October 25, 1999
Revision Date Issued: December 15, 1999
Purpose of Revision: Administrative Amendment

This administrative amendment incorporates the December 13, 1999 Notice of Preliminary Baseline Determination. Because the changes in the permit were only administrative, no formal public notice will be issued.

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

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

DES:RWB:jar

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 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.

[2] Except as provided in condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Federal-Mogul, Sealing Systems
7450 North McCormick Boulevard
Skokie, Illinois 60076
847/568-2656

I.D. No.: 031288ABA
Standard Industrial Classification: 3053, Gaskets, Packing and Sealing Devices

1.2 Owner/Parent Company

Federal-Mogul Corporation
26555 Northwestern Highway
Southfield, Michigan 48034

1.3 Operator

Federal-Mogul Corporation
7450 North McCormick Boulevard
Skokie, Illinois 60076

William Van Horne, Jr.
847/568-2656

1.4 General Source Description

Federal-Mogul, Sealing Systems (Formerly Fel-Pro) is located at 7450 North McCormick Boulevard in Skokie. The source manufactures a variety of gasket friction parts and products used primarily for sealing automobile engines and components. Federal-Mogul's product line includes oil pans, transmission pans, timing covers, valve covers, intake exhaust manifolds, head gaskets, water pump gaskets, and carburetor mountings.

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 F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
^{o}F	degrees Fahrenheit
FIRE	Factor Information Retrieval System, Version 5.0, Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (EPA-454/R-95-012), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
gal	gallon
gr	grains
hr	hour
HAP	Hazardous Air Pollutants
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kW	kilowatt
l	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mft^3	Million cubic feet
Mg	Metric Tonnes or Megagrams
mmBtu	Million Btus
mo	month
MW	Megawatts
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
SCC	Source Classification Code
scf	standard cubic feet
SO_2	Sulfur Dioxide
T	Ton
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
TANKS	USEPA Emission Estimating Program for Storage Tanks
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
U.V.	Ultraviolet
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
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:

Laser Sample Production
Rubber Vulcanizing and Cooling Conveying
Silicone Rubber Molding Machines
Nitrile Rubber Molding Machines
Washer Gluing
Punch Presses
Ink Jet Sprayers
Antistick Applicators
Lasers
Chemical Blending

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:

Punch Presses
Autobaggers
Glass Bead Blasting
Deburring Tumbling
Cork Laminating
EDM Cutting
Tooling Machine Grinders and Cutters
Exhaust Ring Formers
Gasket Flattener
Wabash Press Laminators
Repair Arc Welding
Spot Welding
Wire Ring Welders
Machine Parts Washing
Shrink Film Packaging
Rubber Calendar System
Rubber Mills
Silicone Rubber Mixing
HRAF Laminating
Slab Dip Mixing
Metal Cleaning Process Lines
Misc. Pilot Plant Equipment
Plastic Molding Presses
Battery Changing Units

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)].

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

Equipment used for the mixing and blending of materials at ambient temperature to make water based adhesives, provided each material mixed or blended contains less than 5% organic solvent by weight [35 IAC 201.210(a)(9)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

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)].

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).

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	Description	Date Constructed	Emission Control Equipment
M6-1	Stone Saw (#513)	September, 1987	Dust Collector CD4
M6-2	Tannewitz Model GHE Automatic Saw (#501)	January, 1979	Dust Collector CD4
M6-3	Tannewitz Model GHE Manual Saw (#503)	January, 1979	Dust Collector CD4
M6-5	Burlington Sander (#509)	April, 1982	Dust Collector CD4
R6	Rapistan Weighing Room (Rubber Compounding Weighing Room)	August, 1995	Dust Collector CD23
R4	Farrel Model #3D Branbury Mixer (#761)	October, 1970	Dust Collector CD21
R10	Farrel Model #60 Rubber Mill (#119)	September, 1950	Dust Collector CD21
M8	Universal Plastic Bead Blaster	April, 1986	Dust Collector CD5
OC2-1	M & M Research 170 Oven System North (Coater 170)	November, 1983	None
OC2-2	M & M Research 170 Oven System South(Coater 170)	November, 1983	None
OC2-3	4 Economatic Silk Screens (Coater 170)	November, 1983	None
OC2-4	2 Black Brothers Roller Coaters (Coater 170)	November, 1983	None
OC2-5	Black Brothers Roller Coater (for 170, Offline)	November, 1983	None
OC3-1	Ray Paul Industry Model #48101B 190 Preheat Oven (Coater 190)	October, 1995	None
OC3-2	Fusion Systems U.V. Curing System (Coater 190)	March, 1985	None
OC3-3	M & M Research Curing Oven (Coater 190)	March, 1985	None
OC3-4	2 Black Brothers Roller Coaters (Coater 190)	March, 1985	None
OC4-1	5 Black Brothers Model #220-875 Roller Coaters (Coater 754)	1979	None
OC4-2	M & M Research Oven System - North (Coater 754)	July, 1979	None
OC4-3	M & M Research Oven System - South (Coater 754)	July, 1987	None
OC4-4	3 Economatic Silk Screen Printers (Coater 754)	Between 1979 and 1987	None
OC4-5	M & M Research Ultra Violet Curing Oven (#555) (Coater 754)	October, 1987	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
OC4-6	Black Brothers Roller Coater (for 754, Offline)	November, 1979	None
OC5-1	Black Brothers Model #240-815 Roller Coater (Coater 412)	May, 1989	None
OC5-2	Advanced Curing Systems Oven (Coater 412)	May, 1989	None
OC6-1	M & R 464 Oven - East (Coater 464)	December, 1991	None
OC6-2	M & R 464 Oven - West (Coater 464)	December, 1991	None
OC6-3	3 Black Brothers Roller Coaters (Coater 464)	December, 1991	None
OC7-1	SVECIA Preheat Oven (Coater 762)	October, 1995	None
OC7-2	SVECIA Curing Oven (Coater 762)	June, 1989	None
OC7-3a,b	2 SVECIA Silk Screen Printers (Coater 762)	June, 1989	None
OC7-4	Black Brothers Model #60C530 Roller Coater (for 762, Offline)	January, 1985	None
OC8-2	XericWeb Model #97.138 Curing Chamber (Coater 185(017))	March, 1998	None
OC8-3	4 EKRA Silk Screens (Coater 185(017))	1985	None
OC9-1	Oven System Inc. Curing Oven (Coater 064)	November, 1995	None
OC9-2	Oven System Inc. Curing Oven (Coater 064)	November, 1995	None
OC9-3	3 Black Brothers Roller Coaters (Coater 064)	November, 1995	None
OC10-1	Black Brothers Roller Coater (Coater 290)	December, 1993	None
OC10-2	Oven (Coater 290)	December, 1993	None
OC13-1	M & M Research Preheat Oven (Coater 204(180))	March, 1985	None
OC13-2	Fusion System U.V. Curing Oven - North (Coater 204(180))	March, 1985	None
OC13-3	Ray Paul Industry Model #4808.4.4 Oven - North (Coater 204(180))	October, 1995	None
OC13-4	Fusion System U.V. Curing Oven - South (Coater 204(180))	March, 1985	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
OC13-5	Ray Paul Industry Model #4820-4 Oven - South (Coater 204(180))	October, 1995	None
OC13-6	2 Black Brothers Roller Coaters (Coater 204(180))	March, 1985	None
M51	Black Brothers Roller Coater (Dept. 11, Offline)	January, 1984	None
M59-1	EPCON/Fel-Pro Dip Tank and Room	December, 1993	Oxidizer CO3
M59-2	EPCON/Fel-Pro Drying Conveyor	December, 1993	Oxidizer CO3
OC11-1	Binks/Nordson Adhesive Spray Booth	January, 1994	Filter CF-1 and Oxidizer CO4
OC11-2	Koating Machinery Corp. Primer Curtain Coater	January, 1994	Oxidizer CO4
OC11-3	Koating Machinery Corp. Top Coat Curtain Coater	January, 1995	Oxidizer CO5
OC11-4	Koating Machinery Corp. Top Coat Curtain Coater	January, 1995	Oxidizer CO5
OC11-5	Casso-Solar Corp. Adhesive Bake Oven	January, 1994	Oxidizer CO4
OC11-6	Casso-Solar Corp. Primer Oven	January, 1994	Oxidizer CO4
OC11-7	Casso-Solar Corp. Top Coat Oven	January, 1995	Oxidizer CO5
OC11-8	Casso-Solar Corp. Top Coat Oven	January, 1995	Oxidizer CO5
M52-1	Binks Spray Booth and Drying Rack	October, 1995	Thermal Oxidizer CO2 and Filter CF2
M52-2	Thomas Equipment Drying Rack and Dip Tanks	October, 1995	Thermal Oxidizer CO2
M52-3	Thomas Equipment Wash Tank and Drying Hood	October, 1995	Thermal Oxidizer CO2
M6-4	Cork Rubber Gasket Manufacturing System	January, 1979	None
B1	Titusville #7671 Natural Gas Fired Boiler (13.40 mmBtu/hr)	January, 1962	None
B2	Titusville #7672 Natural Gas Fired Boiler (13.40 mmBtu/hr)	January, 1962	None
B10	Reliance Model #400RW Natural Gas Fired Boiler (13.40 mmBtu/hr)	July, 1970	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
B3	Vapor Corp. Model TRG-5903-Y2HK-150 Natural Gas Fired Boiler (6.30 mmBtu/hr)	July, 1972	None
B4	Vapor Corp. Model TRG-5903-Y2HK-75 Natural Gas Fired Boiler (3.10 mmBtu/hr)	July, 1972	None
B5	Vapor Corp. Model HS2-4611-R3NK-21 Natural Gas Fired Boiler (3.10 mmBtu/hr)	December, 1964	None
B7	Fitzgibbons Heating Boiler (3415 Howard Street) Natural Gas Fired Boiler (3.00 mmBtu/hr)	Prior to 1970	None
B8	Johnson Boiler (3450 Touhy) Natural Gas Fired Boiler (3.40 mmBtu/hr)	January, 1975	None
B9	Johnston Model PFTB-150-3G-150W Natural Gas Fired Boiler (6.30 mmBtu/hr)	November, 1989	None
T3	H.M. Boles & Sons, Inc. 2,000 Gallon Underground Storage Tank	1980	None
T4	H.M. Boles & Sons, Inc. 2,000 Gallon Underground Storage Tank	1980	None
OT1	Six Gasoline/Diesel Engine Test Cells	1964	None
OC2-4c	Kiwi Model #5495T Coater (Coaters #170)	September, 1990	None
OC4-1b	Kiwi Coater (Coaters #754)	September, 1990	None
OC6-3c	Black Brothers Coater (Coaters #464)	March, 1992	None
M65	Kiwi Cork/Lam Cell	August, 1984	None
M6-7	Kiwi Cork/Rubber Gaskets	March, 1992	None
P2-1	Heidelberg Offset Lithographic Printing Press	June, 1986	None
P2-2	A.M. Multigraphic Model LW1250 Letter Press	May, 1988	None
P2-3	A.M. Multigraphic Model LW1250 Letter Press	May, 1989	None
P2-5	A.M. Multigraphic Model LW1250 Letter Press	March, 1995	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
P2-6	Rotovac Offset Lithographic Printing Press	November, 1998	None
Fugitive VOM Emissions	General Use of Cleanup Solvents	-	None
Fugitive PM Emissions	Parking Lots and Roadways	-	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.1.2 This permit is issued based on the source being 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. The emission of smoke or other particulate matter from any emission unit shall not exceed an opacity of greater than 30 percent, except that an opacity of greater than 30 percent but less than 60 percent shall be allowed for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 feet) radius from the center point of any other such emission unit owned or operated by the Permittee, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period, pursuant to 35 IAC 212.123 and 212.124.

5.2.3 Operating Program for Particulate Matter

a. 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)].

b. 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].

c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

d. All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods [35 IAC 212.307].

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 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner

or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

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

5.2.6 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.

5.2.7 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review

within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

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

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to the NESHAP for the Printing and Publishing Industry, 40 CFR 63, Subpart KK, because the flexographic presses at this source are not capable of printing substrates greater than 18 inches in width.

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
Nitrogen Oxides (NO_x)	75.3996
Particulate Matter (PM)	12.2077
Sulfur Dioxide (SO_2)	2.0451
Volatile Organic Material (VOM)	50.9694
HAP, not included in VOM or PM	---
TOTAL	140.6218

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations 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

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 Records of Fugitive Emissions from Parking Lots and Roadways

a. The Permittee shall maintain a record of the maximum aggregate annual emissions of fugitive PM (i.e., road dust) estimated based on the applicable emission factors and formulas specified by Condition 5.9.1, with supporting calculations, so as to demonstrate compliance with the limits in Condition 5.5.

b. This record shall be updated upon construction of additional roadways or parking areas or other permanent change to the source, that alters the maximum aggregate emissions of PM.

5.6.3 Records for Storage Vessels

Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 IAC Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel [35 IAC 218.129(f)].

5.6.4 Records for Natural Gas Usage

The Permittee shall maintain records of the following items for the units which combust natural gas so as to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. Natural gas usage of the source, therms/mo and therms/yr; and

b. Records of the monthly and aggregate annual NO_x, PM, SO_2, and VOM emissions from the combustion of natural gas at the source shall be maintained, based on fuel consumption and the applicable emission factors, with supporting calculations.

5.6.5 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 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

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Fugitive Emissions from Parking Lots and Roadways

For the purpose of estimating fugitive PM emissions from the roadways at the source, the emission factors and formulas in Sections 13.2.1 and 13.2.2 of the AP-42, Volume I, Supplement F, January, 1995 are acceptable.

5.9.2 General Procedures for Calculating Fuel Combustion Emissions

To determine compliance with Condition 5.5.1, emissions from the combustion of natural gas at the source shall be calculated based on the following emission factors:

Pollutant	Emission Factor (lb/Mft^3)
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

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

Natural Gas Fuel Combustion Emissions (lb) = (Natural Gas Consumed, Therms) x (100 ft^3/Therm) x (1 Mft^3/1,000,000 ft^3) x (The Appropriate Emission Factor, lb/Mft^3)

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. Once the ERMS begins, 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 permits. These allotments are established from historical VOM emissions or “baseline emissions” lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

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

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

6.2 Applicability

This 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 emission 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 Condition 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 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 emissions 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 after 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 Sections 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 conditions report within two days after the time when such excess emissions occurred due to the emergency; and

ii. A final emergency conditions 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 Emissions 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 is 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 118 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 3.2256 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:

Emission Unit	Construction Permit No.	Date Issued
Rotovac Offset Lithographic Printing Press (P2-6)	98030082	10/19/1998

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

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 emissions 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 the 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 Exclusions 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)]:

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

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

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

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 they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Boilers B1 - B10
Internal Combustion Engines
Rubber Coated Emboss, OC11

b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement 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 205.405(b) and (c)]:

Rubber Molding Adhesives
Edge Molded Metal Plate

7.0 UNIT SPECIFIC CONDITIONS

7.1 Units M6-1, M6-2, M6-3, M6-5 Cork Rubber Gasket Manufacturing Control CD4 Dust Collector

7.1.1 Description

Large blocks of molded cork/rubber are used to make finished valve cover gaskets. To minimize waste material, the blocks are cut into smaller pieces by using a rotary saw and two band saws. These parts are then assembled with glue. The parts are then sanded on one side to generate a smooth surface before going through a skiver. The sliced sheets have a trade mark design coated on them and then cut by steel run dies into gaskets. Particulate matter emissions from cutting and sanding operations are collected in a baghouse.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
M6-1	Stone Saw (#513)	Dust Collector CD4
M6-2	Tannewitz Model GHE Automatic Saw (#501)	Dust Collector CD4
M6-3	Tannewitz Model GHE Manual Saw (#503)	Dust Collector CD4
M6-5	Burlington Sander (#509)	Dust Collector CD4

7.1.3 Applicability Provisions and Applicable Regulations

a. The Cork Rubber Gasket Manufacturing System saws and sander are "affected saws and sander" for purposes of these unit-specific conditions.

b. The affected saw and sander is subject to the emission limits identified in Condition 5.2.2.

c. The affected saws are subject to 35 IAC 212.321(a), which provides that:

i. 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)].

ii. Because the expected process weight rate for the affected saws is 865 pounds per hour, combined, the allowable PM emission rate for the affected saws set by 35 IAC 212.321 is 1.62 pounds per hour, combined.

7.1.4 Non-Applicability of Regulations of Concern

a. Pursuant to 35 IAC 212.681(a), 35 IAC 212.321, Particulate Matter from Process Emission Units, shall not apply to grinding or sanding.

b. The affected saws and sander are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

7.1.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the dust collector, including periodic inspection, routine maintenance and prompt repair of defects.

7.1.6 Emission Limitations

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

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

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

a. Records addressing use of good operating practices for the dust collector:

i. Records for periodic inspection of the dust collector with date, individual performing the inspection, and nature of inspection; and

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

b. The cork usage of the affected saws and sander, ton/mo and ton/yr; and

c. The monthly and aggregate annual PM emissions from the affected saws and sander based on the operating schedule and the typical hourly emission rate, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected saws and sander 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:

Continued operation of an affected saws with a defect in the dust collector that may result in emissions of particulate matter in excess of limits in Condition 7.1.3(c) within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

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

a. Compliance with Condition 7.1.3(c) is assumed to be achieved to be achieved by proper operation of the dust collector, as addressed by Condition 7.1.5.

b. To determine compliance with Condition 5.5.1, emissions from the affected saws and sander shall be calculated based on the following:

PM (lb) = (Cork Usage, lb) x (0.089 lb Emitted/lb Cork Used) x [1 - (Dust Collector Efficiency* (%)/100)]

* As specified by manufacturer or vendor of the dust collector.

7.2 Unit R6 Rubber Compounding Weighing Room
Control CD23 Dust Collector

7.2.1 Description

Synthetic rubber and powder additives (such as, fillers, vulcanizing agents, and anti-oxidants) are weighed and added to rubber totes bins in the weighing room. Powders are removed from paper bags or drums with hand scoops or quantity fed from gondola bags. The tote could be on a scale or the weighed powders could be poured into the tote after weighing. Rubber could use anywhere from 5 to 15 different powders. If the rubber tote is not used immediately, the tote is covered with plastic. Dust at each weighing location is exhausted through a side vent connected to the dust collector.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
R6	Rapistan Weighing Room (Rubber Compounding Weighing Room)	Dust Collector CD23

7.2.3 Applicability Provisions and Applicable Regulations

a. The Rubber Compounding Weighing Room is an "affected weighing room" for purposes of these unit-specific conditions.

b. Each affected weighing room is subject to the emission limits identified in Condition 5.2.2.

c. The affected weighing room is subject to 35 IAC 212.321(a), which provides that:

i. 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)].

ii. Because the expected process weight rate for the affected weighing room is 1,271 pounds per hour, the allowable PM emission rate for the

affected weighing room set by 35 IAC 212.321 is 2.00 pounds per hour.

7.2.4 Non-Applicability of Regulations of Concern

The affected weighing room is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

7.2.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the dust collector, including periodic inspection, routine maintenance and prompt repair of defects.

7.2.6 Emission Limitations

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

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

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

a. Records addressing use of good operating practices for the dust collector:

i. Records for periodic inspection of the dust collector with date, individual performing the inspection, and nature of inspection; and

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

b. The amount of rubber mixed, lb/mo and ton/yr; and

c. The monthly and aggregate annual PM emissions from the affected weighing room based on the amount of rubber mixed, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected weighing room 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:

Continued operation of the affected weighing room with a defect in the dust collector that may result in emissions of particulate matter in excess of limits in Condition 7.2.3(c) within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

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

a. Compliance with Condition 7.2.3(c) is assumed to be achieved to be achieved by proper operation of the dust collector, as addressed by Condition 7.2.5.

b. To determine compliance with Condition 5.5.1, emissions from the affected weighing room shall be calculated as follows:

PM (lb) = (Amount of Rubber Mixed, lb) x (1.5 lb Emitted/1,000 lb Used) x [1 - (Dust Collector Efficiency* (%)/100)]

* As specified by manufacturer or vendor of the dust collector.

7.3 Units R4, R10 Rubber Compounding Banbury Mixing
Control CD21 Dust Collector

7.3.1 Description

The synthetic batch of rubber is mixed in a Banbury, an enclosed shearing machine. The powders, rubber, and oils are loaded through a chute above the Banbury. Over 50% of each batch are powder materials. There is a vent above the drop door to collect the powders. After a few minutes of mixing, the batch temperature may reach 250°F. The rubber mass is then dropped onto a cool down mill, where a final blending of the uncured rubber is done. A hood above the Rubber Mill directs any loose powder into the dust collector. No VOM will be emitted during this process because the oils in this process are kept below the temperatures at which they volatilize.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
R4	Farrel Model #3D Branbury Mixer (#761)	Dust Collector CD21
R10	Farrel Model #60 Rubber Mill (#119)	Dust Collector CD21

7.3.3 Applicability Provisions and Applicable Regulations

a. The Rubber Compounding Banbury Mixers are "affected mixers" for purposes of these unit-specific conditions.

b. Each affected mixers are subject to the emission limits identified in Condition 5.2.2.

c. The affected mixers are subject to 35 IAC 212.322(a), which provides that:

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

ii. Because the expected process weight rate for the affected mixers is 1,271 pounds per hour, combined, the allowable PM emission rate for the affected mixers set by 35 IAC 212.322 is 3.03 pounds per hour, combined.

7.3.4 Non-Applicability of Regulations of Concern

The affected mixers are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

7.3.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the dust collector, including periodic inspection, routine maintenance and prompt repair of defects.

7.3.6 Emission Limitations

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

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

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

a. Records addressing use of good operating practices for the dust collector:

i. Records for periodic inspection of the dust collector with date, individual performing the inspection, and nature of inspection; and

ii. Records for prompt repair of defects, with identification and description of defect,

effect on emissions, date identified, date repaired, and nature of repair.

b. The amount of rubber mixed, lb/mo and ton/yr; and

c. The monthly and aggregate annual PM emissions from the affected mixers based on the amount of rubber mixed, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected mixers 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:

Continued operation of an affected mixer with a defect in the dust collector that may result in emissions of particulate matter in excess of limits in Condition 7.3.3(c) within 30 days of such an occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

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

a. Compliance with Condition 7.3.3(c) is assumed to be achieved by proper operation of the dust collector, as addressed by Condition 7.3.5.

b. To determine compliance with Condition 5.5.1, PM emissions from the affected mixers shall be calculated as follows:

PM (lb) = (Amount of Rubber Mixed, lb) x (2.2 lb Emitted/1,000 lb Used) x [1 - (Dust Collector Efficiency* (%)/100)]

* As specified by manufacturer or vendor of the dust collector.

7.4 Unit M8 Plastic Bead Blaster
Control CD5 Dust Collector

7.4.1 Description

Rubber molds are cleaned by "shooting" them with a combination wood and plastic bead in a typical "sandblaster" cabinet. The shot is captured in a cyclone and air is sent to a stand alone dust collector.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
M8	Universal Plastic Bead Blaster	Dust Collector CD5

7.4.3 Applicability Provisions and Applicable Regulations

a. The Plastic Bead Blaster is an "affected bead blaster" for purposes of these unit-specific conditions.

b. Each affected mixers are subject to the emission limits identified in Condition 5.2.2.

7.4.4 Non-Applicability of Regulations of Concern

a. Pursuant to 35 IAC 212.681(c), 35 IAC 212.321, Particulate Matter from Process Emission Units, shall not apply to shot blasting.

b. The affected bead blaster is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

7.4.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the dust collector, including periodic inspection, routine maintenance and prompt repair of defects.

7.4.6 Emission Limitations

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

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

a. Records addressing use of good operating practices for the dust collector:

   i. Records for periodic inspection of the dust collector with date, individual performing the inspection, and nature of inspection; and

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

b. Grit usage of the affected bead blaster, lb/mo and ton/yr; and

c. The monthly and aggregate annual PM emissions from the affected bead blaster based on the operating schedule and the typical hourly emission rate, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected bead blaster 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:

None

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

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

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

PM (lb) = (Grit Usage, lb) x [1 - (Dust Collector Efficiency* (%)/100)]

* As specified by manufacturer or vendor of the dust collector.

7.5 Units OC2 - OC10, OC13, M51 Uncontrolled Gasket Coating Lines

7.5.1 Description

This source uses a variety of equipment and raw materials to apply and cure coatings. Coatings are applied by roll coating, or silk screening. The VOM and HAP contents of the coatings will vary depending on the gasket application and customer request. A coating will often be custom formulated for a particular product. Curing of the coatings may involve ultra-violet light curing, oven (thermal) curing, infrared curing, air drying, or carbon dioxide.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
OC2-1	M & M Research 170 Oven System North (Coater 170)	None
OC2-2	M & M Research 170 Oven System South (Coater 170)	None
OC2-3	4 Economatic Silk Screens (Coater 170)	None
OC2-4	2 Black Brothers Roller Coaters (Coater 170)	None
OC2-5	Black Brothers Roller Coater (for 170, Offline)	None
OC3-1	Ray Paul Industry Model #48101B 190 Preheat Oven (Coater 190)	None
OC3-2	Fusion Systems U.V. Curing System (Coater 190)	None
OC3-3	M & M Research Curing Oven (Coater 190)	None
OC3-4	2 Black Brothers Roller Coaters (Coater 190)	None
OC4-1	5 Black Brothers Model #220-875 Roller Coaters (Coater 754)	None
OC4-2	M & M Research Oven System - North (Coater 754)	None
OC4-3	M & M Research Oven System - South (Coater 754)	None
OC4-4	3 Economatic Silk Screen Printers (Coater 754) (Coater 754)	None
OC4-5	M & M Research Ultra Violet Curing Oven (#555) (Coater 754)	None

Emission Unit	Description	Emission Control Equipment
OC4-6	Black Brothers Roller Coater (for 754, Offline)	None
OC5-1	Black Brothers Model #240-815 Roller Coater (Coater 412)	None
OC5-2	Advanced Curing Systems Oven (Coater 412)	None
OC6-1	M & R 464 Oven - East (Coater 464)	None
OC6-2	M & R 464 Oven - West (Coater 464)	None
OC6-3	3 Black Brothers Roller Coaters (Coater 464)	None
OC7-1	SVECIA Preheat Oven (Coater 762)	None
OC7-2	SVECIA Curing Oven (Coater 762)	None
OC7-3a,b	2 SVECIA Silk Screen Printers (Coater 762)	None
OC7-4	Black Brothers Model #60C530 Roller Coater (for 762, Offline)	None
OC8-2	XericWeb Model #97.138 Curing Chamber (Coater 185(017))	None
OC8-3	4 EKRA Silk Screens (Coater 185(017))	None
OC9-1	Oven System Inc. Curing Oven (Coater 064)	None
OC9-2	Oven System Inc. Curing Oven (Coater 064)	None
OC9-3	3 Black Brothers Roller Coaters (Coater 064)	None
OC10-1	Black Brothers Roller Coater (Coater 290)	None
OC10-2	Oven (Coater 290)	None
OC13-1	M & M Research Preheat Oven (Coater 204(180))	None
OC13-2	Fusion System U.V. Curing Oven - North (Coater 204(180))	None
OC13-3	Ray Paul Industry Model #4808.4.4 Oven - North (Coater 204(180))	None
OC13-4	Fusion System U.V. Curing Oven - South (Coater 204(180))	None
OC13-5	Ray Paul Industry Model #4820-4 Oven - South (Coater 204(180))	None
OC13-6	2 Black Brothers Roller Coaters (Coater 204(180))	None
M51	Black Brothers Roller Coater (Dept. 11, Offline)	None

7.5.3 Applicability Provisions and Applicable Regulations

a. Gasket Coating Lines OC1 - OC10, OC13, and M51 are "affected coating lines" for purposes of these unit-specific conditions.

b. The affected coating lines are subject to the emission limits identified in Condition 5.2.2.

c. The affected coating lines are subject to 35 IAC 212.321(a), which provides that:

   i. 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)].

   ii. Because the expected process weight rate for the affected coating lines is less than 100 pounds per hour from each affected coating ling, the allowable PM emission rate for the affected coating lines set by 35 IAC 212.321 is 0.55 pounds per hour for each affected coating line.

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

e. Pursuant to 35 IAC 218.204, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. The following emission limitations are 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, except where noted. 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 composition. The emission limitations are as follows:

i. Miscellaneous Metal Parts and Products Coating/Extreme Performance Coating Air Dried [35 IAC 218.204(j)(2)(A)]:

kg/l	lb/gal
0.42	3.5

ii. Miscellaneous Metal Parts and Products Coating/Extreme Performance Coating Baked [35 IAC 218.204(j)(2)(B)]:

kg/l	lb/gal
0.40	3.3

7.5.4 Non-Applicability of Regulations of Concern

a. The curing and drying ovens on the affected coating lines are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the actual heat input of each unit is less than 2.9 MW (10 mmBtu/hr) and the curing and drying ovens are not by definition fuel combustion emission units.

b. The curing and drying ovens on the affected coating lines are not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the curing and drying ovens are not by definition fuel combustion emission units.

c. The affected coating lines are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

d. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.5.5 Operational and Production Limits and Work Practices

The curing and drying ovens on the affected coating lines shall only be operated with electricity or natural gas as the fuels.

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating lines are subject to the following:

a. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Operating Hours (hours/yr)	Volatile Organic Material Emissions (lb/hr)	Volatile Organic Material Emissions (Ton/yr)
Coating Line #190 (OC3)	7,000	0.42	1.44
Wire Ring Cell (OC5)	6,240	0.53	1.64
Screen Printing Cell (OC7)	6,120	0.68	2.07
2 Gasket Coaters (OC6)	5,980	0.72	2.16
		Total	7.35

i. These limits are based on representations of the maximum actual emissions resulting from the maximum hourly coating usage utilizing coatings with the highest actual VOM content at the maximum hours of operation.

ii. The above limitations contain revisions to previously issued Permit 73080189. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance 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). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limits for "Paper Coating Line #190 (OC3)" and "Metal Coating Line #190 (OC3)" have been combined into the limit for "Coating Line #190 (OC3)" [T1R].

b. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Volatile Organic Material Emissions (Ton/mo)	(Ton/yr)
Coating Line #170 (OC2)	0.84	5.01
Coating Line #754 (OC4)	1.07	6.40
Head Gasket Cell #2 (OC9)	0.83	5.00
	Total	16.41

i. These limits are based on representations of the maximum actual emissions resulting from the maximum coating usage utilizing coatings with the highest actual VOM content at the maximum hours of operation.

ii. The above limitations contain revisions to previously issued Permit 73080189. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance 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). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the limit for VOM emissions has been increased by 3.62 tons/year for line OC2, 4.32 for line OC4, and 4.53 tons/year for line OC9 [T1R].

c. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Volatile Organic Material Emissions (Ton/mo)	(Ton/yr)
Solvent Cleanup Operation	1.55	9.27

i. These limits are based on representations of the maximum actual emissions resulting from the maximum solvent usage and a minimum VOM recovery of 30% by weight in the waste solvent.

ii. The above limitations contain revisions to previously issued Permit 73080189. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance 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). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the basis for limit on VOM emissions has been revised to reflect a minimum of 30% by weight recovery of VOM in the waste solvent [T1R].

d. Emissions and operation of equipment shall not exceed the following limits:

i. Emissions and operation of the Natural Gas-Fired Gasket Coater Curing Ovens (OC6) shall not exceed the following limits:

Item of Equipment	Operating Hours (hrs/yr)	EMISSIONS NO_x (lb/hr)	EMISSIONS NO_x (T/yr)	EMISSIONS CO (lb/hr)	EMISSIONS CO (T/yr)
2 Curing Ovens	5980	0.30	0.90	0.06	0.18

These limits are based on standard emission factors, the type of fuel, the maximum firing rates and the maximum hours of operation.

ii. The above limitations were established in Permit 92040039, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). 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 the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

e. i. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Operating Hours (Hrs/yr)	VOM Content (lb/gal)	VOM Emissions (lb/hr)	VOM Emissions (T/yr)
EMMP Coating Application	6,750	0.48	0.19	0.62

These limits are based on representations of the maximum actual emission rate, and the maximum hours of operation. The annual limit is the product of the hourly limit and the maximum hours of operation.

ii. The above limitations were established in Permit 93070061, 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].

f. 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).

7.5.7 Testing Requirements

a. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under Condition 7.5.7(b) (see also 35 IAC 218.211) [35 IAC 218.211(a)].

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

ii. 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 7.5.9(b) directly reflect the application of such material and separately account for any additions of solvent.

c. i. Upon written request from the Illinois EPA, pursuant to 35 IAC 201.282 and Section 39.5(7)(b) of the Act, tests shall be performed which will allow evaluation of the waste solvents in order to determine compliance with the requirements of Condition 7.5.6(c).

ii. These tests shall be performed by an approved independent laboratory. USEPA Method 24 shall be used for testing of waste coatings and solvents. Refer to 40 CFR 60, Appendix A for USEPA test methods.

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating lines to demonstrate compliance with Conditions 5.5.1, 7.5.3, and 7.5.6 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.5.7, 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.

b. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected coating lines and maintain the information at the source for a period of three years:

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

ii. 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.

c. Types of substrate material coated on the affected coating lines;

d. Records of the coating usage for the affected coating lines, gal/mo and gal/yr;

e. The VOM content of coatings, % by Wt;

f. Density of coatings, lb/gal;

g. Records of the amount of cleanup solvent added to the affected coating lines, gal/mo and gal/yr;

h. Density of solvent, lb/gal;

i. Records of the amount of cleanup solvent recovered from the affected coating lines, gal/mo and gal/yr;

j. Natural gas fuel usage of the Gasket Coater Ovens on Coating Line OC6, Therms/mo and Therms/yr;

k. The monthly and aggregate annual VOM emissions from the affected coating lines based on the material usage, with supporting calculations; and

l. The monthly and aggregate annual CO, NO_x, PM, SO_2, and VOM emissions from the Gasket Coater Ovens on Coating Line OC6 shall be maintained, based on fuel usage and

the applicable emission factors, with supporting calculations.

7.5.10 Reporting Requirements

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

a. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.5.3(e) (see also 35 IAC 218.204) within 30 days following the occurrence of the violation.

b. Emissions of VOM in excess of the limits in Condition 7.5.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

c. Emissions of CO and/or NO_x in excess of the limits in Condition 7.5.6(d)(i) based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

a. Compliance with Conditions 7.5.3(c) and (d) is assumed to be achieved by the work-practices inherent in operation of a natural gas-fired drying oven.

b. To determine compliance with Conditions 5.5.1 and 7.5.6, VOM emissions from the affected coating lines shall be calculated based on the following:

VOM (lb) = (Coating Usage, gal) x (Coating Density, lb/gal) x (VOM Content of Coating, % by Wt.) + {(Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal) x [1 - (Cleaning Solvent Recovery*(%)/100)]}

* As specified by testing pursuant to Condition 7.5.7(c).

c. To determine compliance with Conditions 5.5.1 and 7.5.6(d)(i), fuel combustion emissions from the Gasket Coater Ovens on Coating Line OC6 shall be calculated based on the following emission factors:

Pollutant	Emission Factor (lb/Mft^3)
CO	84
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

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

Natural Gas Fuel Combustion Emissions (lb) = (Natural Gas Consumed, Therms) x (100 ft^3/Therm) x (1 Mft^3/1,000,000 ft^3) x (The Appropriate Emission Factor, lb/Mft^3)

7.6 Unit M59 Edge Molded Metal Plate System
Control CO3 Oxidizer

7.6.1 Description

The production of an edge molded metal plate begins with a clean metal plate and ends with a gasket with rubber molded inserts. For the rubber to adhere to the metal, a chemical adhesive with a high VOM content is used. Although there are water based adhesives, none are suitable for the high temperature environment in which the finished part must perform. The plates are dipped into a tank and then run out though a heated drying section. An oxidizer is installed to control the emissions from the dipping room and the drying section. The heated air is generated from the oxidizer operation.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
M59-1	EPCON/Fel-Pro Dip Tank and Room	Oxidizer CO3
M59-2	EPCON/Fel-Pro Drying Conveyor	Oxidizer CO3

7.6.3 Applicability Provisions and Applicable Regulations

a. The Edge Molded Metal Plate System is an "affected coating line" for purposes of these unit-specific conditions.

b. The affected coating line is subject to the emission limits identified in Condition 5.2.2.

c. The affected coating line is subject to 35 IAC 212.321(a), which provides that:

i. 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)].

ii. Because the expected process weight rate for the affected coating line is less than 100 pounds per hour, the allowable PM emission

rate for the affected coating line set by 35 IAC 212.321 is 0.55 pounds per hour.

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

e. The affected coating line is subject to 35 IAC 218 Subpart F, which provides that:

i. Except as provided in Condition 7.6.3(e)(ii) (35 IAC 218.207) no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Miscellaneous Metal Parts and Products Extreme Performance Baked Coating. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator. 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 composition [35 IAC 218.204(c)]:

kg/l	lb/gal
0.40	3.3

ii. Any owner or operator of a coating line subject to 35 IAC 218.204 may comply with 35 IAC 218.207, rather than Condition 7.6.3(e)(i) (see also 35 IAC 218.204), if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with Condition 7.6.3(e)(iii) (see also 35 IAC 218.207(c)) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in Condition 7.6.7 (see also 35 IAC 218.105) and the recordkeeping and reporting requirements specified in Conditions 7.6.9 and 7.6.10 (see also 35 IAC 218.211(e)); and the control device is equipped with the applicable monitoring equipment specified in Condition 7.6.8 (see also 35 IAC 218.105(d)) and the monitoring equipment is install, calibrated, operated and maintained according to vendor

specifications at all times the control device is in use [35 IAC 218.207(a)].

iii. No owner or operator of a coating line subject to the emission limitations in Condition 7.6.3(e)(i) (35 IAC 218.204(j)(2)(B)) and equipped with a capture system and control device shall operate the affected coating line unless the coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency [35 IAC 218.207(b)(i) and 218.207(c)].

7.6.4 Non-Applicability of Regulations of Concern

a. The drying oven on the affected coating line is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the actual heat input of this unit is less than 2.9 MW (10 mmBtu/hr) and the drying oven is are by definition a fuel combustion emission unit.

b. The drying oven on the affected coating line is not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of this unit is less than 73.2 MW (250 mmBtu/hr) and the drying oven is not by definition a fuel combustion emission unit.

c. The affected coating line is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

d. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.6.5 Operational and Production Limits and Work Practices

a. The afterburner combustion chambers shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This

temperature shall be maintained during operation of the affected coating line.

b. The Permittee shall follow good operating practices for the afterburner, including periodic inspection, routine maintenance and prompt repair of defects.

c. The affected coating line shall only be operated with natural gas as the fuel in the dryer.

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating line is subject to the following:

a. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Operating Hours (hours/yr)	VOM Content (lb/gal)	VOM Emissions (lb/hr)	VOM Emissions (Ton/yr)
EMMP Adhesive Application	6750	6.18	0.15	0.50

These limits are based on representations of the maximum actual emission rate. the maximum hours of operation, 95% overall control of the capture system and oxidizer, and a minimum VOM recovery of 25% by weight in the waste adhesive and coating. The annual limit is the product of the hourly limit and the maximum hours of operation.

b. The above limitations contain revisions to previously issued Permit 93070061. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance 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). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and

accurate information for the source. Specifically, the above limits are now based on a 95% overall control of the capture system and oxidizer instead of an 85% overall control of the capture system and oxidizer system and a minimum of 25% by weight recovery of VOM in the waste adhesive and coating [T1R].

c. 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).

7.6.7 Testing Requirements

a. The VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test method and procedures specified in 35 IAC 218.105 to establish the records required under 35 IAC 218.211 [35 IAC 218.211(a)].

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

ii. 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 7.6.9(f) directly reflect the application of such material and separately account for any additions of solvent.

c. Upon reasonable request by the Illinois EPA, pursuant to 35 IAC 218.211(e)(1), the owner or operator of the subject coating line shall perform all tests and submit to the Illinois EPA the results of all tests and calculations necessary to demonstrate that the subject coating line will be in compliance with 35 IAC 218.207.

d. i. Upon written request from the Illinois EPA, pursuant to 35 IAC 201.282 and Section 39.5(7)(b) of the Act, tests shall be performed which will allow evaluation of the waste adhesive and coating in order to determine compliance with the requirements of Condition 7.6.6(a).

ii. These tests shall be performed by an approved independent laboratory. USEPA Method 24 shall be used for testing of waste coatings and solvents. Refer to 40 CFR 60, Appendix A for USEPA test methods.

7.6.8 Monitoring Requirements

An owner or operator that uses an afterburner to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which has a catalyst bed, commonly known as a catalytic afterburner, the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust [35 IAC 218.105(d)(2)(A)(ii)].

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Conditions 5.5.1, 7.6.3, and 7.6.6 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.6.7, 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.

b. Records of the testing of the efficiency of each capture system and control device pursuant to

Condition 7.6.7(c), which include the following [Section 39.5(7)(e) of the Act]:

i. The date, place and time of sampling or measurements;

ii. The date(s) analyses were performed;

iii. The company or entity that performed the analyses;

iv. The analytical techniques or methods used;

v. The results of such analyses; and

vi. The operating conditions as existing at the time of sampling or measurement.

c. Pursuant to 35 IAC 218.211(e)(2), the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

i. Control device monitoring data;

ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source; and

iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

d. Records addressing use of good operating practices for the oxidizer:

i. Records for periodic inspection of the oxidizer with date, individual performing the inspection, and nature of inspection; and

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

e. Records of the amount of adhesive and coating added to the affected coating line, gal/mo and gal/yr;

f. The VOM content of coatings, % by Wt;

g. Density of coatings, lb/gal;

h. Records of the amount of adhesive and coating recovered from the affected coating line, gal/mo and gal/yr;

i. The solvent usage for the affected coating line, gal/mo and gal/yr;

j. Density of solvent, lb/gal; and

k. The monthly and aggregate annual VOM emissions from the affected coating line based on the coating and solvent usage and the oxidizer efficiency, with supporting calculations.

7.6.10 Reporting Requirements

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

a. Any record showing violation of Condition 7.6.3(e) (see also 35 IAC 218.207) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211(e)(3)(A)].

b. Emissions of VOM in excess of the limits in Condition 7.6.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

a. Compliance with Conditions 7.6.3(c) and (d) is assumed to be achieved by the work-practices inherent in operation of a natural gas-fired drying oven.

b. To determine compliance with Conditions 5.5.1 and 7.6.6, VOM emissions from the affected coating line shall be calculated based on the following:

VOM (lb) = {(Coating Usage, gal) x (Coating Density, lb/gal) x (VOM Content of Coating, % by Wt.) x [1 - (Coating Recovery*(%)/100)] x [1 - (Oxidizer Efficiency** (%)/100)]} + {(Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal) x [1 - (Oxidizer Efficiency* (%)/100)]}

* As specified by testing pursuant to Condition 7.6.7(d).

** As specified by manufacturer or vendor of the oxidizer or by testing pursuant to Condition 7.6.7

7.7 Unit OC11 Rubber Coated Emboss System
Controls CF-1, CO4, and CO5 Filter and Oxidizers

7.7.1 Description

This process produces a gasket with several layers of steel, each coated with layers of rubber. An adhesive, a primer and the rubber coating are all have high VOM contents. There are no water based coatings available for this process. Coating is done in a series of steps. All the layers may not receive the same treatment. Clean metal first goes into a spray booth with a filter where adhesive is applied. It is then dried in an infrared oven. Next, a primer coat is applied using a curtain coater. It is also dried in an infrared oven. Finally, a rubber coat is applied again using curtain coaters. The gaskets are dried in infrared ovens. The spray booth, coaters, ovens and conveyors are enclosed. The adhesive and primer fumes exit to one oxidizer, while the top coat lines go to a second oxidizer. Later, the gaskets are assembled in a sandwich fashion using eyelets and a laser removes certain parts of the rubber coating. The fumes are discharged to the oxidizer. Clean up of the adhesive sprayer, curtain coaters, conveyors and miscellaneous pieces of equipment is done near exhaust points to the oxidizer whenever possible to reduce fugitive emissions.

7.7.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
OC11-1	Binks/Nordson Adhesive Spray Booth	Filter CF-1 and Oxidizer CO4
OC11-2	Koating Machinery Corp. Primer Curtain Coater	Oxidizer CO4
OC11-3	Koating Machinery Corp. Top Coat Curtain Coater	Oxidizer CO5
OC11-4	Koating Machinery Corp. Top Coat Curtain Coater	Oxidizer CO5
OC11-5	Casso-Solar Corp. Adhesive Bake Oven	Oxidizer CO4
OC11-6	Casso-Solar Corp. Primer Oven	Oxidizer CO4
OC11-7	Casso-Solar Corp. Top Coat Oven	Oxidizer CO5
OC11-8	Casso-Solar Corp. Top Coat Oven	Oxidizer CO5

7.7.3 Applicability Provisions and Applicable Regulations

a. The Rubber Coated Emboss System is an "affected coating line" for purposes of these unit-specific conditions.

b. The affected coating line is subject to the emission limits identified in Condition 5.2.2.

c. The affected coating line is subject to 35 IAC 212.321(a), which provides that:

   i. 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)].

   ii. Because the expected process weight rate for the affected coating line is less than 100 pounds per hour, the allowable PM emission rate for the affected coating line set by 35 IAC 212.321 is 0.55 pounds per hour.

d. The affected coating line is subject to 35 IAC 218 Subpart F, which provides that:

   i. Except as provided in Condition 7.7.3(d)(ii) (35 IAC 218.207) no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Miscellaneous Metal Parts and Products Extreme Performance Baked Coating. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator. 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 composition [35 IAC 218.204(c)]:

kg/l	lb/gal
0.40	3.3

   ii. Any owner or operator of a coating line subject to 35 IAC 218.204 may comply with 35 IAC 218.207, rather than Condition 7.7.3(d)

(see also 35 IAC 218.204), if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with Condition 7.7.3(d)(iii) (35 IAC 218.207(c)) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in Condition 7.7.7 (see also 35 IAC 218.105) and the recordkeeping and reporting requirements specified in Conditions 7.7.9 and 7.7.10 (see also 35 IAC 218.211(e)); and the control device is equipped with the applicable monitoring equipment specified in Condition 7.7.8 (see also 35 IAC 218.105(d)) and the monitoring equipment is install, calibrated, operated and maintained according to vendor specifications at all times the control device is in use [35 IAC 218.207(a)].

iii. No owner or operator of a coating line subject to the emission limitations in Condition 7.7.3(d)(i) (35 IAC 218.204(j)(2)(B)) and equipped with a capture system and control device shall operate the affected coating line unless the coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency [35 IAC 218.207(b)(i) and 218.207(c)].

7.7.4 Non-Applicability of Regulations of Concern

a. The affected coating line is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

b. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.7.5 Operational and Production Limits and Work Practices

a. The afterburner combustion chambers shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance

was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation of the affected coating line.

b. The Permittee shall follow good operating practices for the oxidizers, including periodic inspection, routine maintenance and prompt repair of defects.

7.7.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating line is subject to the following:

a. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Operating Hours (hours/yr)	VOM Content (lb/gal)	VOM Emissions (lb/mo)	VOM Emissions (Ton/yr)
RCE Adhesive and Coatings	6,000	6.6	690	4.12
RCE Cleanup Solvent	---	6.8	753	6.44
			Total	10.56

These limits are based on representations of the maximum actual emission rate, the maximum hours of operation, 95% overall control of the capture systems and oxidizers, and a minimum VOM recovery of 20% by weight in the waste solvent. The annual limit is the product of the hourly limit and the maximum hours of operation.

b. Notwithstanding 35 IAC 218.107, shutdown of the natural gas fired afterburners and capture systems used to comply with 35 IAC Part 218 during the period of November 1 of any year to April 1 of the following year is not permitted.

c. The above limitations contain revisions to previously issued Permit 93070124. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance 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).

These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the hourly emission limit of the Rubber Coated Emboss System has been replaced with a monthly limit of the annual VOM emissions have been increased from 3.96 tons/year from the adhesives and coatings and 2.01 tons/year from the cleanup solvent to 4.14 tons/year from the adhesives and coatings and 6.44 tons/year from the cleanup solvent. The basis for limit on VOM emissions from the cleanup solvent has been revised to reflect a minimum of 20% by weight recovery of VOM in the waste solvent [T1R].

d. 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).

7.7.7 Testing Requirements

a. The VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test method and procedures specified in 35 IAC 218.105 to establish the records required under 35 IAC 218.211 [35 IAC 218.211(a)].

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

ii. 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 7.7.9(f) directly reflect the application of such

material and separately account for any additions of solvent.

c. Upon reasonable request by the Illinois EPA, pursuant to 35 IAC 218.211(e)(1), the owner or operator of the subject coating line shall perform all tests and submit to the Illinois EPA the results of all tests and calculations necessary to demonstrate that the subject coating line will be in compliance with 35 IAC 218.207.

d. i. Upon written request from the Illinois EPA, pursuant to 35 IAC 201.282 and Section 39.5(7)(b) of the Act, tests shall be performed which will allow evaluation of the waste solvents in order to determine compliance with the requirements of Condition 7.7.6.

ii. These tests shall be performed by an approved independent laboratory. USEPA Method 24 shall be used for testing of waste coatings and solvents. Refer to 40 CFR 60, Appendix A for USEPA test methods.

7.7.8 Monitoring Requirements

An owner or operator that uses an afterburner to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which has a catalyst bed, commonly known as a catalytic afterburner, the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust [35 IAC 218.105(d)(2)(A)(ii)].

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Conditions 5.5.1, 7.7.3, and 7.7.6 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.7.7, 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.

b. Records of the testing of the efficiency of each capture system and control device pursuant to Condition 7.7.7(c), which include the following [Section 39.5(7)(e) of the Act]:

i. The date, place and time of sampling or measurements;

ii. The date(s) analyses were performed;

iii. The company or entity that performed the analyses;

iv. The analytical techniques or methods used;

v. The results of such analyses; and

vi. The operating conditions as existing at the time of sampling or measurement.

c. Pursuant to 35 IAC 218.211(e)(2), the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

i. Control device monitoring data;

ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source; and

iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

d. Records addressing use of good operating practices for the oxidizer:

i. Records for periodic inspection of the oxidizer with date, individual performing the inspection, and nature of inspection; and

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

e. Records of the coating usage for the affected coating line, gal/mo and gal/yr;

f. The VOM content of coatings, % by Wt;

g. Density of coatings, lb/gal;

h. Records of the amount of cleanup solvent added to the affected coating line, gal/mo and gal/yr;

i. Density of solvent, lb/gal; and

j. Records of the amount of cleanup solvent recovered from the affected coating line, gal/mo and gal/yr;

k. The monthly and aggregate annual VOM emissions from the affected coating line based on the coating and solvent usage and the oxidizer efficiency, with supporting calculations.

7.7.10 Reporting Requirements

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

a. Any record showing violation of Condition 7.7.3(d) (see also 35 IAC 218.207) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211(e)(3)(A)].

b. Emissions of VOM in excess of the limits in Condition 7.7.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.7.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1, 7.7.3, and 7.7.6, PM and VOM emissions from the affected coating lines shall be calculated based on the following:

a. Particulate Matter Emissions (Spray Application):

PM (lb) = (Coating Usage, gal) x (Coating Density, lb/gal) x (Wt % Solids) x [1 - (Transfer Efficiency* (%)/100)]

b. Volatile Organic Material Emissions:

VOM (lb) = {(Coating Usage, gal) x (Coating Density, lb/gal) x (VOM Content of Coating, % by Wt.) x [1 - (Oxidizer Efficiency* (%)/100)]} + {(Capture Efficiency** (%)/100) x (Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal) x [1 - (Cleaning Solvent Recovery**(%)/100)]} + {(1 - (Capture Efficiency** (%)/100)] x (Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal) x [1 - (Cleaning Solvent Recovery**(%)/100)] x [1 - (Oxidizer Efficiency* (%)/100)]}

* As specified by manufacturer or vendor of the oxidizer or by testing pursuant to Condition 7.7.7

** As specified by testing pursuant to Condition 7.7.7(d).

7.8 Unit M52 Rubber Molding Adhesive Room Control CO2 Thermal Oxidizer

7.8.1 Description

Rubber molding to metal or plastic carriers requires a chemical bond between the metal and rubber. Although there are some water based adhesives on the market, none have been found that survives the high temperature environment to which these gaskets are exposed. The solvent based adhesives are applied to cleaned metal or plastic parts by putting them into a dipping tank or by spraying them in spray booths. The coated parts are air dried. The operations take place in a specially designed room which is enclosed. Exhausts are directed to an oxidizer. Minimal clean up uses a solvent in the room. Fumes are exhausted to the oxidizer. Spent adhesives are stored in a 55 gallon, closed drum.

7.8.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
M52-1	Binks Spray Booth and Drying Rack	Thermal Oxidizer CO2 and Filter CF2
M52-2	Thomas Equipment Drying Rack and Dip Tanks	Thermal Oxidizer CO2
M52-3	Thomas Equipment Wash Tank and Drying Hood	Thermal Oxidizer CO2

7.8.3 Applicability Provisions and Applicable Regulations

a. The Rubber Molding Adhesive Room is an "affected coating line" for purposes of these unit-specific conditions.

b. The affected coating line is subject to the emission limits identified in Condition 5.2.2.

c. The affected coating line is subject to 35 IAC 212.321(a), which provides that:

i. 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)].

ii. Because the expected process weight rate for the affected coating line is less than 100 pounds per hour, the allowable PM emission rate for the affected coating line set by 35 IAC 212.321 is 0.55 pounds per hour.

d. The affected coating line is subject to 35 IAC 218 Subpart F, which provides that:

i. Except as provided in Condition 7.8.3(d)(ii) (35 IAC 218.207) no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Miscellaneous Metal Parts and Products Extreme Performance Baked Coating. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator. 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 composition [35 IAC 218.204(c)]:

kg/l	lb/gal
0.40	3.3

ii. Any owner or operator of a coating line subject to 35 IAC 218.204 may comply with 35 IAC 218.207, rather than Condition 7.8.3(d)(i) (see also 35 IAC 218.204), if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with Condition 7.8.3(d)(iii) (35 IAC 218.207(c)) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in Condition 7.8.7 (see also 35 IAC 218.105) and the recordkeeping and reporting requirements specified in Conditions 7.8.9 and 7.8.10 (see also 35 IAC 218.211(e)); and the control device is equipped with the applicable monitoring equipment specified in Condition 7.8.8 (see also 35 IAC 218.105(d)) and the monitoring equipment is install, calibrated,

operated and maintained according to vendor specifications at all times the control device is in use [35 IAC 218.207(a)].

iii. No owner or operator of a coating line subject to the emission limitations in Condition 7.8.3(d)(i) (35 IAC 218.204(j)(2)(B)) and equipped with a capture system and control device shall operate the affected coating line unless the coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency [35 IAC 218.207(b)(i) and 218.207(c)].

7.8.4 Non-Applicability of Regulations of Concern

a. The affected coating line is not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

b. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

7.8.5 Operational and Production Limits and Work Practices

a. The afterburner combustion chambers shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation of the affected coating line.

b. The Permittee shall follow good operating practices for the afterburner and filter, including periodic inspection, routine maintenance and prompt repair of defects.

7.8.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating line is subject to the following:

a. The thermal oxidizer and capture system shall be operated to achieve at least an 95% overall reduction in VOM emissions from the affected coating line.

b. Notwithstanding 35 IAC 218.107, shutdown of the natural gas fired afterburner and capture system used to comply with 35 IAC Part 218 during the period of November 1 of any year to April 1 of the following year is not permitted.

c. Emissions and operation of equipment shall not exceed the following limits:

Material	Material Usage (lb/hr)	VOM Content (% by Wt)	VOM Emissions (lb/hr)	VOM Emissions (Ton/yr)
Adhesives	1.16	90	0.052	0.23
Thinner/Cleaner	4.25	100	0.215	0.94
			Total	1.17

These limits are based on representations of the maximum actual emission rate, the maximum coating and solvent usage, 95% overall control of the capture system and oxidizer, and a minimum VOM recovery of 40% by weight in the waste adhesive and cleanup solvent.

d. The above limitations contain revisions to previously issued Permit 95030084. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance 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). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the minimum overall control of the capture system and oxidizer has been reduced from 98% to 95% and the permitted VOM emissions of the application adhesives from 0.021 lb/hr and 0.09 ton/year to 0.052 lb/hr and 0.23 ton/year and the permitted VOM emissions from the use of thinner and cleaner has been increased from

0.085 lb/hr and 0.37 ton/year to 0.215 lb/hr and 0.94 ton/year. The above limits are now based on a minimum of 40% by weight recovery of VOM in the waste adhesive and cleanup solvent [T1R].

e. 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).

7.8.7 Testing Requirements

a. The VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test method and procedures specified in 35 IAC 218.105 to establish the records required under 35 IAC 218.211 [35 IAC 218.211(a)].

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

ii. 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 7.8.9(f) directly reflect the application of such material and separately account for any additions of solvent.

c. Upon reasonable request by the Illinois EPA, pursuant to 35 IAC 218.211(e)(1), the owner or operator of the subject coating line shall perform all tests and submit to the Illinois EPA the results of all tests and calculations necessary to demonstrate that the subject coating line will be in compliance with 35 IAC 218.207.

d. i. Upon written request from the Illinois EPA, pursuant to 35 IAC 201.282 and Section 39.5(7)(b) of the Act, tests shall be performed which will allow evaluation of the

waste adhesive and cleanup solvent in order to determine compliance with the requirements of Condition 7.8.6.

ii. These tests shall be performed by an approved independent laboratory. USEPA Method 24 shall be used for testing of waste coatings and solvents. Refer to 40 CFR 60, Appendix A for USEPA test methods.

7.8.8 Monitoring Requirements

An owner or operator that uses an afterburner to comply with any Section of 35 IAC Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which has a catalyst bed, commonly known as a catalytic afterburner, the temperature rise across each catalytic afterburner bed or VOM concentration of exhaust [35 IAC 218.105(d)(2)(A)(ii)].

7.8.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected coating line to demonstrate compliance with Conditions 5.5.1, 7.8.3, and 7.8.6 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings and cleaning solvents pursuant to Condition 7.8.7, 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.

b. Records of the testing of the efficiency of each capture system and control device pursuant to Condition 7.6.7(a), which include the following [Section 39.5(7)(e) of the Act]:

i. The date, place and time of sampling or measurements;

ii. The date(s) analyses were performed;

iii. The company or entity that performed the analyses;

iv. The analytical techniques or methods used;

v. The results of such analyses; and

vi. The operating conditions as existing at the time of sampling or measurement.

c. Pursuant to 35 IAC 218.211(e)(2), the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

i. Control device monitoring data;

ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source; and

iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

d. Records addressing use of good operating practices for the oxidizer and filter:

i. Records for periodic inspection of the oxidizer and filter with date, individual performing the inspection, and nature of inspection; and

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

e. Records of the amount of adhesive and coating added to the affected coating line, gal/mo and gal/yr;

f. The VOM content of coatings, % by Wt;

g. Density of coatings, lb/gal;

h. Records of the amount of adhesive and coating recovered from the affected coating line, gal/mo and gal/yr;

i. The amount of cleanup solvent added to the affected coating line, gal/mo and gal/yr;

j. Density of solvent, lb/gal;

k. The amount of cleanup solvent recovered from the affected coating line, gal/mo and gal/yr; and

l. The monthly and aggregate annual VOM emissions from the affected coating line based on the coating and solvent usage and the oxidizer efficiency, with supporting calculations.

7.8.10 Reporting Requirements

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

a. Any record showing violation of Condition 7.8.3(d) (see also 35 IAC 218.207) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.211(e)(3)(A)].

b. Emissions of VOM in excess of the limits in Condition 7.8.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.8.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.8.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1, 7.8.3, and 7.8.6, PM and VOM emissions from the affected coating lines shall be calculated based on the following:

a. Particulate Matter Emissions (Spray Application):

PM (lb) = (Coating Usage, gal) x (Coating Density, lb/gal) x (Wt % Solids) x [1 - (Transfer Efficiency* (%)/100)] x [1 - (Filter Efficiency* (%)/100)]

* As specified by manufacturer or vendor of the filter.

b. Volatile Organic Material Emissions:

VOM (lb) = {(Coating Usage, gal) x (Coating Density, lb/gal) x (VOM Content of Coating, % by Wt.) x [1 - (Coating Recovery*(%)/100)] x [1 - (Oxidizer Efficiency** (%)/100)]} + {(Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal) x [1 - (Solvent Recovery*(%)/100)] x [1 - (Oxidizer Efficiency** (%)/100)]}

* As specified by testing pursuant to Condition 7.8.7(d).

** As specified by manufacturer or vendor of the oxidizer or by testing pursuant to Condition 7.8.7

7.9 Unit M6-4 Frame Gluing

7.9.1 Description

A two part epoxy adhesive is used to glue blocks of cork/rubber to make a frame. The adhesive is mixed in a paint roller pan and applied with a paint roller. The emissions are a result of the materials in the adhesive drying and evaporating. When clean up of the frame is required, solvent is used. Roller brushes are soaked in a covered bucket of solvent. All solvent issued to the department is assumed to be emitted.

7.9.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
M6-4	Cork Rubber Gasket Manufacturing System	None

7.9.3 Applicability Provisions and Applicable Regulations

a. The Frame Gluing System is an "affected gluing operation" for purposes of these unit-specific conditions.

b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.9.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected gluing operation not being subject to 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, because the affected gluing operation does not meet the applicability of 35 IAC 218.920(a) and (b). In particular, the affected gluing operation has:

a. Maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year; and

b. A potential to emit for VOM that is less than 22.7 Mg (25 tons) per year.

7.9.5 Operational and Production Limits and Work Practices

None

7.9.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected gluing operation is subject to the following:

a. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Operating Hours (hours/yr)	Volatile Organic Material Emissions (lb/hr)	(Ton/yr)
Gluing Table D37	2,000	8.85	8.85

i. These limits are based on representations of the maximum actual emissions resulting from the maximum hourly coating usage utilizing coatings with the highest actual VOM content at the maximum hours of operation.

ii. The above limitations were established in Permit 73080189, 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].

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).

7.9.7 Testing Requirements

None

7.9.8 Monitoring Requirements

None

7.9.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected gluing operation to demonstrate

compliance with Conditions 5.5.1, 7.9.3, and 7.9.6 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the adhesive usage for the affected gluing operation, gal/day and gal/yr;

b. The VOM content of the adhesive, % by Wt;

c. Density of adhesives, lb/gal;

d. The solvent usage for the affected gluing operation, gal/day and gal/yr;

e. Density of solvent, lb/gal; and

f. The monthly and aggregate annual VOM emissions from the affected gluing operation based on the adhesive and solvent usage, with supporting calculations.

7.9.10 Reporting Requirements

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

a. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that this emission unit is exempt from those requirements [35 IAC 218.990].

b. Emissions of VOM from the affected gluing operation in excess of the limits specified in Condition 7.9.3, 7.9.4(b), and/or 7.9.6 within 30 days of such an occurrence.

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.9.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.9.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1, 7.9.3, and 7.9.6, VOM emissions from the affected gluing operation shall be calculated based on the following:

VOM (lb) = (Adhesive Usage, gal) x (Adhesive Density, lb/gal) x (VOM Content of Adhesive, % by Wt.) + (Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal)

7.10 Units B1, B2, B10 Natural Gas Boilers (> 10 mmBtu/hr)

7.10.1 Description

Federal-Mogul utilizes boilers for space heating, steam generators for processes, hot water heaters, space heaters and food preparation. There are nine boilers at the source which have heat inputs of more than 2.5 mmBtu/hr. There are six boilers for hot water generation and building heat and three steam generators for processes. The steam generators are for rubber vulcanization, water heating, and miscellaneous uses. These units have maximum heat input ratings of greater than 10 mmBtu/hr and fire only natural gas.

7.10.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Rated Heat Input
B1	Titusville #7671 Natural Gas Fired Boiler	13.40 mmBtu/hr
B2	Titusville #7672 Natural Gas Fired Boiler	13.40 mmBtu/hr
B10	Reliance Model #400RW Natural Gas Fired Boiler	13.40 mmBtu/hr

7.10.3 Applicability Provisions and Applicable Regulations

a. Boilers B1, B2, and B10 are "affected boilers" for purposes of these unit-specific conditions.

b. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.10.4 Non-Applicability of Regulations of Concern

a. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, modified, or reconstructed after June 9, 1989. The affected boilers were constructed in 1962 and 1970, therefore, these rules do not apply.

b. The affected boilers are 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 each of these affected boilers is less than 73.2 MW (250 mmBtu/hr).

c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use Of Organic Material.

7.10.5 Operational and Production Limits and Work Practices

The affected boilers shall only be operated with natural gas as the fuel.

7.10.6 Emission Limitations

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

7.10.7 Testing Requirements

None

7.10.8 Monitoring Requirements

None

7.10.9 Recordkeeping Requirements

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

None

7.10.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected boilers 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:

N/A

7.10.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.10.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.10.9 and the emission factors and formulas listed below:

Compliance with Conditions 7.10.3(b) and (c) is assumed to be achieved by the work-practices inherent in operation of natural gas-fired boilers, so that no compliance procedures are set in this permit addressing this regulation.

7.11 Units B3, B4, B5, B7, B8, B9 Natural Gas Boilers (< 10 mmBtu/hr)

7.11.1 Description

Federal-Mogul utilizes boilers for space heating, steam generators for processes, hot water heaters, space heaters and food preparation. There are nine boilers at the source which have heat inputs of more than 2.5 mmBtu/hr. There are six boilers for hot water generation and building heat and three steam generators for processes. The steam generators are for rubber vulcanization, water heating, and miscellaneous uses. These units have maximum heat input ratings exceeding 0.3 mmBtu/hr, but are less than 10 mmBtu/hr and fire only natural gas.

7.11.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Rated Heat Input
B3	Vapor Corp. Model TRG-5903-Y2HK-150 Natural Gas Fired Boiler	6.30 mmBtu/hr
B4	Vapor Corp. Model TRG-5903-Y2HK-75 Natural Gas Fired Boiler	3.10 mmBtu/hr
B5	Vapor Corp. Model HS2-4611-R3NK-21 Natural Gas Fired Boiler	3.10 mmBtu/hr
B7	Fitzgibbons Heating Boiler (3415 Howard Street) Natural Gas Fired Boiler	3.00 mmBtu/hr
B8	Johnson Boiler (3450 Touhy) Natural Gas Fired Boiler	3.40 mmBtu/hr
B9	Johnston Model PFTB-150-3G-150W Natural Gas Fired Boiler	6.30 mmBtu/hr

7.11.3 Applicability Provisions and Applicable Regulations

a. Boilers B3, B4, B5, B7, B8, and B9 are "affected boilers" for purposes of these unit-specific conditions.

b. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.

7.11.4 Non-Applicability of Regulations of Concern

a. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units that have a maximum design heat input capacity of 29 MW (100 mmBtu/hr) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr). The affected boilers have maximum design heat input capacities of less than 2.9

MW (10 mmBtu/hr), therefore, this regulation does not apply.

b. The affected boilers are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the actual heat input of each affected boiler is less than 2.9 MW (10 mmBtu/hr).

c. The affected boilers are not subject to 35 IAC 217.121, emissions or nitrogen oxides from new fuel combustion emission sources, or 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the actual heat input of each affected boiler is less than 73.2 MW (250 mmBtu/hr).

d. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, use of organic material.

7.11.5 Operational and Production Limits and Work Practices

The affected boilers shall only be operated with natural gas as the fuel.

7.11.6 Emission Limitations

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

7.11.7 Testing Requirements

None

7.11.8 Monitoring Requirements

None

7.11.9 Recordkeeping Requirements

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

None

7.11.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected boilers 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:

N/A

7.11.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.11.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.11.9 and the emission factors and formulas listed below:

N/A

7.12 Units T3 & T4 Gasoline Storage Tanks

7.12.1 Description

Federal-Mogul has two 2,000 gallon underground storage tanks to supply gasoline to its six engine testing cells. The gasoline is strictly for test engines. There is no "pump" dispenser. Gasoline is unloaded from tanker trucks. These tanks were upgraded in 1991 for spill control and monitoring for leaks. These tanks are hard piped to the testing cells. Gasoline tanks are filled when the tanker arrives. Because the tanks are underground, VOM emissions are expected due only to working losses.

7.12.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
T3	H.M. Boles & Sons, Inc. 2,000 Gallon Underground Storage Tank	None
T4	H.M. Boles & Sons, Inc. 2,000 Gallon Underground Storage Tank	None

7.12.3 Applicability Provisions and Applicable Regulations

a. Gasoline Storage Tanks T3 and T4 are "affected tanks" for purposes of these unit-specific conditions.

b. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108 [35 IAC 218.122(b)].

7.12.4 Non-Applicability of Regulations of Concern

a. The affected tanks are not subject to the NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60 Subparts A and Ka, because each affected tank has a storage capacity less than 151,416 l (40,000 gal).

b. The affected tanks are not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, pursuant to 35 IAC 218.119, because

the affected tanks are used to store a petroleum liquid and the capacity of each affected tank is less than 151 m^3 (40,000 gal).

c. The affected tanks are not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, pursuant to 35 IAC 218.123(a)(2), which exempts storage tanks with capacities less than 151.42 m^3 (40,000 gal).

d. The affected tanks are not subject to 35 IAC 218.583, Gasoline Dispensing Operations - Storage Tank Filling Operations or 35 IAC 218.586, Gasoline Dispensing Operations - Motor Vehicle Fueling Operations, because the affected tanks are not part of a gasoline dispensing operation as defined in 35 IAC 211.2590.

e. The affected tanks are not subject to 35 IAC 218.585, Gasoline Volatility Standards, because the source does not sell, offer for sale, dispense, supply, offer for supply, or transport gasoline for use in Illinois.

7.12.5 Operational and Production Limits and Work Practices

The affected tanks shall only be used for the storage of gasoline.

7.12.6 Emission Limitations

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

7.12.7 Testing Requirements

None

7.12.8 Monitoring Requirements

None

7.12.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tanks to demonstrate compliance with Conditions 5.5.1 and 7.12.3 pursuant to Section 39.5(7)(b) of the Act:

a. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 IAC Part 218 other than those required by maintaining

readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel [35 IAC 218.129(f)].

b. Design information for the affected tanks showing the presence of permanent submerged loading pipes;

c. Maintenance and repair records for the affected tanks, as related to the repair or replacement of the loading pipes;

d. The throughput of the affected tanks, gal/mo and gal/yr; and

e. The annual VOM emissions from the affected tanks based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.12.10 Reporting Requirements

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

a. Any storage of VOL in an affected tank that is not in compliance with the requirements of Conditions 7.12.3(c) (see also 35 IAC 218.122(b)), e.g., no "permanent submerged loading pipe," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance;

b. Any storage of VOL in an affected tank that is out of compliance with the requirements of Conditions 7.12.3(c) (see also 35 IAC 218.122(b)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance;

c. The storage of any VOL or VPL other than the material specified in Condition 7.12.5 within 30 days of becoming aware of the non-compliance status. This

notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.12.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.12.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.12.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from each affected tank, version 3.1 of the TANKS program is acceptable.

7.13 Units OT1 Six Engine Test Cells

7.13.1 Description

Federal-Mogul operates six engine test cells, which may use gasoline or diesel fuel. The operation of these test cells is dependent upon customer demand and Federal-Mogul's design/engineering program. The engines (90% are above 150 horsepower) are based on Federal-Mogul's own test specifications. The engine test involve running the engines for three minutes wide open and then idled for three minutes. There can be no back pressure on the engines so no catalytic converters are used.

7.13.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
OT1	Six Gasoline/Diesel Engine Test Cells	None

7.13.3 Applicable Regulations

a. The Six Gasoline/Diesel Engine Test Cells are “affected engine test cells" for the purpose of these unit-specific conditions.

b. Each affected engine test cell is subject to the emission limits identified in Condition 5.2.2.

c. Pursuant to 35 IAC 214.122(b)(2) and 214.304, no person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from the burning of fuel at process emission units located in the Chicago major metropolitan area with actual heat input smaller than, or equal to 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hr of actual input when distillate fuel oil is burned (0.3 lb/mmBtu).

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

e. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.13.4 Non-Applicability of Regulations of Concern

a. The affected engine test cells are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected engine test cells are not by definition fuel combustion emission units.

b. The affected engine test cells are 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 each unit is less than 73.2 MW (250 mmBtu/hr) and the affected engine test cells are not by definition fuel combustion emission units.

c. This permit is issued based on the affected engine test cells not being subject to 35 IAC 212.322 because due to the unique nature of this process, such rules cannot reasonably be applied.

d. The affected engine test cells are not subject to 35 IAC 212.324, Process Emission Units In Certain Areas, because the source is not located in a non-attainment area for PM_{10}, as identified in 35 IAC 212.324(a)(1).

7.13.5 Operational and Production Limits and Work Practices

a. The affected engine test cells shall only be operated with distillate fuel oil or gasoline as the fuels.

b. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values shall not be used in an affected engine test cells:

i. 0.28 weight percent, or

ii. The weight percent given by the formula: maximum weight percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).

7.13.6 Emission Limitations

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

7.13.7 Testing Requirements

None

7.13.8 Monitoring Requirements

None

7.13.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected engine test cells to demonstrate compliance with Conditions 5.5.1 and 7.13.3 pursuant to Section 39.5(7)(b) of the Act:

a. Distillate fuel oil usage for the affected engine test cells, gal/mo and gal/yr;

b. The sulfur content of the distillate fuel oil used in the affected engine test cells (% by Wt), this shall be recorded for each shipment of oil delivered to the source;

c. The heat content of the distillate fuel oil used in the affected engine test cells, Btu/gal;

d. Gasoline usage for the affected engine test cells, gal/mo and gal/yr; and

e. Monthly and annual aggregate NO_x, PM, SO_2, and VOM emissions from the affected engine test cells shall be maintained, based on type of fuel used, fuel consumption and the applicable emission factors, with supporting calculations.

7.13.10 Reporting Requirements

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

The use of distillate fuel oil with a sulfur content in excess of the limit specified in Condition 7.13.5(b) with the length of time this fuel was used and the effect on emissions of SO_2 within 30 days of this violation being detected.

7.13.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.13.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.13.9 and the emission factors and formulas listed below:

a. Compliance with Conditions 7.13.3(b) and (e) is assumed to be achieved by the work-practices inherent in operation of the affected engine test cells.

b. Compliance with Condition 7.13.3(c) is demonstrated by operation of the affected engine test cells with distillate fuel oil with a sulfur content meeting the specification of Condition 7.13.5(b).

c. Compliance with Condition 7.13.3(d) is assumed to be achieved by the work-practices inherent in operation of gasoline-fueled engine test cells.

d. To determine compliance with Condition 5.5.1, emissions from the affected engine test cells shall be calculated based on the following emission factors:

i. Gasoline Engines:

Pollutant	Emission Factor (lb/1000 gal)
NO_x	102
PM	6.47
SO_2	5.31
VOM	14.8

These are the emission factors for uncontrolled gasoline reciprocating engine testing (SCC #20400401), FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, August, 1995.

Engine Test Cell Emissions (lb) = (Gasoline Consumed, gal) x (The Appropriate Emission Factor, lb/1000 gal)

ii. Diesel Engines:

Pollutant	Emission Factor (lb/1000 gal)
NO_x	469.0
PM	33.5
SO_2	31.2
VOM	32.1

These are the emission factors for uncontrolled diesel/kerosene reciprocating engine testing (SCC #20400402), FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, August, 1995.

Engine Test Cell Emissions (lb) = (Distillate Fuel Oil Consumed, gal) x (The Appropriate Emission Factor, lb/1000 gal)

7.14 Units FP Flexographic Printing

7.14.1 Description

Federal-Mogul has a copyrighted a blue-striped logo for its aftermarket gaskets. This non-functional logo is applied by various size roller coaters. The logo can be applied at multiple locations in the manufacturing process. The coating is air dried. Approximately 800 gallons of coating are used in a year. Water is used for cleanup.

7.14.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
OC2-4c	Kiwi Model #5495T Coater (Coaters #170)	None
OC4-1b	Kiwi Coater (Coaters #754)	None
OC6-3c	Black Brothers Coater (Coaters #464)	None
OC9-3c	Black Brothers Coater (Coaters #064)	None
M65	Kiwi Cork/Lam Cell	None
M6-7	Kiwi Cork/Rubber Gaskets	None

7.14.3 Applicability Provisions and Applicable Regulations

a. Coaters OC2-4c, OC4-1b, OC6-3c, OC9-3c, M65, and M6-7 are "affected printing lines" for purposes of these unit-specific conditions.

b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.14.4 Non-Applicability of Regulations of Concern

a. The affected printing lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK, because the affected printing lines are not capable of printing substrates greater than 18 inches in width.

b. This permit is issued based on the affected printing lines not being subject to 35 IAC 218 Subpart H,

Printing and Publishing, because the affected printing lines do not meet the applicability of 35 IAC 218.402(a)(1) and (2). In particular, the affected printing lines have:

i. Total maximum theoretical emissions of VOM from all flexographic and rotogravure printing line(s) (including solvents used for cleanup operations associated with flexographic and rotogravure printing line(s)) at the source are less than 90.7 Mg (100 tons) per year; and

ii. The flexographic and rotogravure printing line(s) (including solvents used for cleanup operations associated with flexographic and rotogravure printing line(s)) at the source have a potential to emit of less than 22.7 Mg (25 tons) per year.

7.14.5 Operational and Production Limits and Work Practices

a. The affected printing lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK, because the affected printing lines are not capable of printing substrates greater than 18 inches in width.

b. This permit is issued based on affected printing lines using cleaning solvents containing no VOM.

7.14.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

a. Emissions of VOM from the affected printing lines shall not exceed 24.9 tons per year.

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).

c. The above limitations are being established in this permit. These limits ensure that the affected printing lines are not subject to the control requirements of 35 IAC 218 Subpart H, Printing and Publishing.

7.14.7 Testing Requirements

a. The VOM content of each coating shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under Condition 7.14.7(b) (see also 35 IAC 218.404) [35 IAC 218.404(a)].

b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).

ii. 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 7.14.9(b) directly reflect the application of such material and separately account for any additions of solvent.

7.14.8 Monitoring Requirements

None

7.14.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with Conditions 5.5.1, 7.14.3, 7.14.5, and 7.14.6 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings, inks, and cleaning solvents pursuant to Condition 7.14.7, which include the following [Section 39.5(7)(e) of the Act]:

i. Identification of material tested.

ii. Results of analysis.

iii. Documentation of analysis methodology.

iv. Person performing analysis.

b. Pursuant to 35 IAC 218.404(b)(2), the owner or operator of a printing line subject to the limitations of 35 IAC 218.401 and complying by means of 35 IAC 218.401(a) shall collect and record all of the following information each day for the affected printing line:

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

ii. The VOM content and the volume of each coating and ink as applied each day on the affected printing line.

c. Records shall be maintained of the VOM content of each cleaning solvent used on the affected printing lines as follows:

i. The VOM content of these materials, lb VOM/gal with source of data, i.e., as determined from material safety data sheets, manufacturer specifications, process formulation data, and/or testing using USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A; and

ii. Records of material consumption shall be maintained for each cleaning solvent used on the affected printing lines on a monthly basis.

d. Records of the ink and coating usage for the affected printing lines, gal/mo and gal/yr;

e. The VOM content of inks and coatings, % by Wt;

f. Density of inks and coatings, lb/gal;

g. Records of the solvent usage for the affected printing lines, gal/mo and gal/yr;

h. Density of solvent, lb/gal; and

i. The monthly and aggregate annual VOM emissions from the affected printing lines based on the ink and solvent usage, with supporting calculations.

7.14.10 Reporting Requirements

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

a. The owner or operator of a flexographic or rotogravure printing line exempted from the limitations of 35 IAC 218.401 because of the criteria in Condition 7.14.4 (see also 35 IAC 218.402) shall notify the Illinois EPA of any record showing that total maximum theoretical emissions of VOM from all printing lines exceed 90.7 Mg (100 tons) in any calendar year before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs [35 IAC 218.404(b)(3)].

b. The usage of a cleaning solvent containing VOM shall be reported by sending a copy of such record to the Illinois EPA within 30 days of such an occurrence.

7.14.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.14.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.14.9 and the emission factors and formulas listed below:

a. Pursuant to 35 IAC 218.404(b)(1)(B), calculations which demonstrate that total maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines at the source never exceed 90.7 Mg (100 tons) per calendar year before the application of capture systems and control devices. Total maximum theoretical emissions of VOM for a flexographic or rotogravure printing source is the sum of maximum theoretical emissions of VOM from each flexographic and rotogravure printing line at the source. The following equation shall be used to calculate total maximum theoretical emissions of VOM per calendar year before the application of capture systems and control devices for each flexographic and rotogravure printing line at the source:

$$E_p = A \times B + 1095 (C \times D \times F)$$

Where:

E_p = Total maximum theoretical emissions of VOM from one flexographic or rotogravure printing line in units of kg/yr (lb/yr);

A = Weight of VOM per volume of solids of the coating or ink with the highest VOM content as applied each year on the printing line in units of kg VOM/l (lb VOM/gal) of coating or ink solids;

B = Total volume of solids for all coatings and inks that can potentially be applied each year on the printing line in units of l/yr (gal/yr). The instrument and/or method by which the owner or operator accurately measured or calculated the volume of each coating and ink as applied and the amount that can potentially be applied each year on the printing line shall be described in the certification to the Illinois EPA;

C = Weight of VOM per volume of material for the cleanup material or solvent with the highest VOM content as used each year on the printing line in units of kg/l (lb VOM/gal) of such material;

D = The greatest volume of cleanup material or solvent used in any 8-hour period and

F = The highest fraction of cleanup material or solvent which is not recycled or recovered for offsite disposal during any 8-hour period.

b. To determine compliance with Conditions 5.5.1 and 7.14.6, emissions from the affected printing line shall be calculated based on the following:

Volatile Organic Material Emissions:

VOM (lb) = (Coating or Ink Usage, gal) x (Coating Density, lb/gal) x (VOM Content of Coating or Ink, lb/gal) + (Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal)

7.15 Units P2 Lithographic Printing

7.15.1 Description

Federal-Mogul utilizes an in house printing department for low volume production of catalogues, stationary, and promotional materials. An off-set printer also applies a logo and set contents to chip board boxes in the packaging area. None of the five sheet fed printers are heatset web offset lithographic machines. The inks and cleaning use less than 300 gallons per year.

7.15.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
P2-1	Heidelberg Offset Lithographic Printing Press	None
P2-2	A.M. Multigraphic Model LW1250 Letter Press	None
P2-3	A.M. Multigraphic Model LW1250 Letter Press	None
P2-5	A.M. Multigraphic Model LW1250 Letter Press	None
P2-6	Rotovac Offset Lithographic Printing Press	None

7.15.3 Applicability Provisions and Applicable Regulations

a. Lithographic Presses P2-1, P2-2, P2-3, P2-5, and P2-6 are "affected printing lines" for purposes of these unit-specific conditions.

b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.15.4 Non-Applicability of Regulations of Concern

a. The affected printing lines are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 9 and 63, Subparts A and KK, because the affected printing lines are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.

b. The affected printing lines are not subject to the control requirements of 35 IAC 218.407, Emission Limitations and Control Requirements for Lithographic Printing Lines On and After March 15, 1996 pursuant to 35 IAC 218.405(d)(2), which exempts sources with combined emissions of VOM from all lithographic printing line(s) (including solvents used for cleanup operations associated with the lithographic printing line(s)) that never exceed 45.5 kg/day (100 lb/day).

7.15.5 Operational And Production Limits and Work Practices

The affected printing lines shall only be used for the application of words, designs, pictures, or other images to a substrate using ink.

7.15.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

a. Emissions and operation of equipment shall not exceed the following limits:

Item of Equipment	Operating Hours (Hours/yr)	Volatile Organic Material Emissions (lb/hr)	(Ton/yr)
Printing Operation	4,000	1.67	3.33

i. These limits are based on representations of the maximum actual emissions resulting from the maximum hourly coating usage utilizing coatings with the highest actual VOM content at the maximum hours of operation.

ii. The above limitations were established in Permit 73080189, 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].

b. i. Emissions of VOM from the affected printing lines shall not exceed 100 pounds per day.

ii. The above limitation is being established in this permit. These limits ensure that the affected printing lines are not subject to the

control requirements of 35 IAC 218.407, Emission Limitations and Control Requirements for Lithographic Printing Lines On and After March 15, 1996.

c. i. This permit is issued based on negligible emissions of volatile organic material (VOM) from the non-heatset offset lithographic printing press (P2-6). For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

ii. The above limitations were established in Permit 98090082, 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].

d. 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).

7.15.7 Testing Requirements

Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(b) of the Act, the VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

a. The VOM content of representative coatings "as applied" on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 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.

7.15.8 Monitoring Requirements

None

7.15.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with Conditions 5.5.1, 7.15.3, and 7.15.6 pursuant to Section 39.5(7)(b) of the Act:

a. Records of the testing of VOM content of coatings, inks, and cleaning solvents pursuant to Condition 7.15.7, which include the following [Section 39.5(7)(e) of the Act]:

   i. Identification of material tested.

   ii. Results of analysis.

   iii. Documentation of analysis methodology.

   iv. Person performing analysis.

b. On and after March 15, 1996, pursuant to 35 IAC 218.411(a)(2), an owner or operator of lithographic printing line(s) exempt from the limitations of 35 IAC 218.407 because of the criteria in Condition 7.15.4(b) (see also 35 IAC 218.405(d)) shall collect and record the information specified in 35 IAC 218.411(a)(2)(B) (i.e., purchase and inventory recordkeeping) for all lithographic printing lines at the source, including the following:

   i. The name, identification, and VOM content of each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line, recorded each month;

   ii. Inventory records from the beginning and end of each month indicating the total volume of each fountain solution additive, lithographic ink, and cleaning solvent to be used on any lithographic printing line at the source;

   iii. Monthly purchase records for each fountain solution additive, lithographic ink, and cleaning solvent used on any lithographic printing line at the source;

   iv. A daily record which shows whether a lithographic printing line at the source was in operation on that day;

v. The total VOM emissions at the source each month, determined as the sum of the product of usage and VOM content for each fountain solution additive, cleaning solvent, and lithographic ink (with the applicable ink VOM emission adjustment) used at the source, calculated each month based on the monthly inventory and purchase records required to be maintained pursuant to Conditions 7.15.9(c)(i), (ii), and (iv) (see also 35 IAC 218.411(a)(2)(B)(i), (a)(2)(B)(ii) and (a)(2)(B)(iii)); and

vi. The VOM emissions in lb/day for the month, calculated in accordance with Condition 7.15.12(a) (see also 35 IAC 218.411(a)(1)(B)).

c. Ink and coating purchase records for the affected printing lines, gal/mo and gal/yr;

d. The VOM content of inks and coatings, % by Wt;

e. Density of inks and coatings, lb/gal;

f. Solvent purchase records for the affected printing lines, gal/mo and gal/yr;

g. Density of solvent, lb/gal; and

h. The monthly and aggregate annual VOM emissions from the affected printing lines based on ink and solvent purchase, with supporting calculations.

7.15.10 Reporting Requirements

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

a. On and after March 15, 1996, pursuant to 35 IAC 218.411(a)(3), an owner or operator of lithographic printing line(s) exempt from the limitations of 35 IAC 218.407 because of the criteria in Condition 7.15.4(b) (see also 35 IAC 218.405(d)) shall notify the Illinois EPA in writing if the combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup

operations associated with the lithographic printing lines) at the source ever exceed 45.5 kg/day (100 lb/day), before the use of capture systems and control devices, within 30 days after the event occurs. Such notification shall include a copy of all records of such event.

b. Emissions of VOM in excess of the limits in Condition 7.15.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.15.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.15.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.15.9 and the emission factors and formulas listed below:

a. Pursuant to 35 IAC 218.411(a)(1)(B), calculations which demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 45.5 kg/day (100 lb/day) before the use of capture systems and control devices, as follows:

i. To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that printing lines at the source were in operation;

ii. To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the tests methods and procedures set forth in Condition 7.15.7(c) (see also 35 IAC 218.409(c)) shall be used;

iii. To determine VOM emissions from inks used on lithographic printing line(s) at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from

all non-heatset inks, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing line(s); and

iv. To determine VOM emissions from fountain solutions and cleaning solvents used on lithographic printing line(s) at the source, no retention factor is used.

b. To determine compliance with Conditions 5.5.1 and 7.15.6(a) and (c), emissions from the affected printing lines shall be calculated based on the following:

Volatile Organic Material Emissions:

VOM (lb) = (Coating or Ink Purchased, gal) x (Coating Density, lb/gal) x (VOM Content of Coating or Ink, lb/gal) x (Adjustment Factor for VOM Retention in Substrate) + (Cleaning Solvent Purchased, gal) x (Solvent Density, lb/gal)

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 June 24, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes 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 [Section 39.5(12)(a) of the Act]. 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 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 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 (MC 40)
Bureau of Air
Compliance Section
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
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to comply with Title I requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the 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 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; 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

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

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 T/hr):

	Metric	English
P	Mg/hr	T/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 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/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 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/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	7.1	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 Emissions of Particulate Matter from Existing Process Emission Units

10.2.1 Process Emission Units for Which Construction or Modification Commenced Prior to 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 process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(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 212.322(b)]:

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

Where:

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

i. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

ii. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

c. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.3 Attachment 3 - 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: _____

RWB:jar