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1.0 SOURCE IDENTIFICATION

1.1 Source

Van Leer Containers, Inc.  
4300 West 130th Street  
Alsip, Illinois 60803-2093  
708/371-4777

I.D. No.: 031003ABA  
Standard Industrial Classification: 3412, Metal Barrels, Drums,  
Kegs, and Pails.

1.2 Owner/Parent Company

Van Leer Containers  
4300 West 130th Street  
Alsip, Illinois 60658

1.3 Operator

Van Leer Containers  
4300 West 130th Street  
Alsip, Illinois 60658

Mary Lynn Hall  
708/371-4777

1.4 General Source Description

The Van Leer Containers, Inc is located at 4300 West 130th Street, Alsip, Cook County. Van Leer manufactures steel drums with different sizes and various steel parts which are an integral part of the drums. Steel drums are made from steel sheet. Drums are lined in a spray booth and then passed through a multi-zoned oven. The exhaust from the spray booths and the paint ovens from the drum and drums parts manufacturing lines flow through a regenerative thermal oxidizer (RTO) to reduce volatile organic materials (VOM) emissions prior to release to the atmosphere.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AER	Annual Emission Report
ACMA	Alternative Compliance Market Account
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATUs	Allotment Trading Units
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
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
ft <sup>3</sup>	cubic feet
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilograms
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
m <sup>3</sup>	cubic meters
MACT	Maximum Available Control Technology
Mft <sup>3</sup>	million cubic feet
Mg	Megagrams
mmBtu	Million British thermal units
MSDS	Material Safety Data Sheets
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	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
PTE	Permanent Total Enclosure
RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
scf	standard cubic feet

SO <sub>2</sub>	Sulfur Dioxide
T	ton
T1	Title I - identifies Title I conditions that have been carried over from an existing construction 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 construction permit and subsequently revised in this permit
tpy	tons per year
TTE	Temporary Total Enclosure
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt. %	weight percent
yr	Year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

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

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

- a. 5.2 mmBtu/hr natural gas fired boiler.
- b. Steel sheet washer that combusts natural gas and uses a non-VOM solvent.

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:

None

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

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

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

#### 3.2 Compliance with Applicable Requirements

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
Lithographic Coater with Oven	Apply Exterior Coating and/or Text on Drums	1967	None
Steel Drum & Drum Parts Coating Line <sup>1</sup>	Manufacture Steel Drums & Drum Parts	Prior 1978	RTO, Fiberglass Paint Filter & Paper Paint Filter
Drum Parts Flash-Off Oven	Evaporate Residual Lubricant from Parts	1996	Regenerative Thermal Oxidizer (RTO)
Soil Vapor Extraction System	Extract VOM from Ground	1997	None
Silk Screen Machine	Apply Exterior Coating and/or Text on Drums	1988	None

NOTE: Fugitive emissions are included in the above emission units, therefore, there is no separate category.

<sup>1</sup> The walking beam lining machine and the paint machine were installed in 1988 to replace the existing machines without increasing any emission.

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Source Description

This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions and 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.
  - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
  - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
  - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

- c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
  - d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].
- 5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:
- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
  - b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.
- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable

requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

#### 5.2.6 Episode Action Plan

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

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	448.4
Sulfur Dioxide (SO <sub>2</sub> )	0.3
Particulate Matter (PM)	2.9
Nitrogen Oxides (NO <sub>x</sub> )	65.9
HAP, not included in VOM or PM	--
TOTAL	517.5

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

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

## 5.6 General Recordkeeping Requirements

### 5.6.1 Emission Records

- a. 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.

- b. The Permittee shall maintain records of HAPs emissions for reporting purpose in the AER of Condition 9.7.

### 5.6.2 Records for Operating Scenarios

None

### 5.6.3 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

None

5.9 General Compliance Procedures

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

## 6.0 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 further reasonable 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 emission reduction from stationary sources required for reasonable further progress.

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

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 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 Section 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

### 6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

#### 6.5 Emission Excursion Compensation

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

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days 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 Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
  - i. An initial emergency condition report within two days after the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission 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 October 31 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 464 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 46.3877 tons. This determination includes the use of 1995 and 1996 as baseline seasons.
  - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit 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  
Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
  - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
  - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emission 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 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 their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

None

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, shall not be subject to the VOM emissions reductions requirements specified in 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)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Lithographic Coater with Oven  
 Control 01 - None

7.1.1 Description

The lithographic coater applies coating by using a roller to steel sheets prior to being formed into drums. Some of the coating is for drum linings and other coatings are extreme performance coatings that are applied to the steel sheets that become the drum exterior. The coatings are then dried in a subsequent oven.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Lithographic Coater and Oven	Applies Exterior, Interior Coating on Drum Lining to Sheets that are Dried in an Oven.	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line", for the purpose of these unit-specific conditions, is a coating line that coats miscellaneous metal parts, products where the coatings dried in a gas fired oven.
  - b. An affected coating line is subject to 35 IAC 218.204(j), which provides that:
    - i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for miscellaneous metal parts and products 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 by an affected coating line:
      - A. Drum Interior Coating [35 IAC 218.204(j)(3)]
- | <u>kg/liter</u> | <u>lb/gallon</u> |
|-----------------|------------------|
| 0.52            | 4.3              |

B. Drum Exterior Coating (Extreme Performance Coating) [35 IAC 218.204(j)(2)]

<u>kg/liter</u>	<u>lb/gallon</u>	
0.40	3.3	(Oven dried)

- ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.
  - iii. An affected coating line may comply with the above listed coating VOM content limits by using a daily-weighted average VOM content and the procedures of Condition 7.1.12(a)(ii). The daily-weighted average method can only be used for coatings subject to the same numerical VOM content limit (e.g., all coatings used on the line are subject to 3.5 lb/gallon) used that day. [35 IAC 218.205]
- c. The natural gas fired oven of an affected coating line is subject to the opacity and SO<sub>2</sub> emission limits identified in Conditions 5.2.2(c) and (d), respectively.
- d. An affected coating line is subject to 35 IAC 212.322, which provides that:
- i. The Permittee shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection © of 35 IAC 212.322 [35 IAC 212.322(a)].
  - ii. Interpolated and extrapolated values of the data in 35 IAC 212.322(c) shall be determined by using the equation:

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

where:

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

A. For process weight rates up to 27.2 Mg/hr  
(30 T/hr):

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

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

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

iii. Limits for Process Emission Units for which  
construction or modification commenced prior  
to April 14, 1972.

<u>Metric</u>		<u>English</u>	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.27	0.05	0.55
0.01	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	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

P	<u>Metric</u>		<u>English</u>	
	Mg/hr	E kg/hr	P T/hr	E lbs/hr
230.0	27.7	250.00	61.00	
270.0	28.5	300.00	63.10	
320.0	29.4	350.00	64.90	
360.0	30.0	400.00	66.20	
400.0	30.6	450.00	67.70	
454.0	31.3	500.00	69.00	

where:

P = Process weight rate in Mg/hr or T/hr, and  
E = Allowable emission rate in kg/hr or  
lbs/hr [35 IAC 212.322].

7.1.4 Non-Applicability of Regulations of Concern

An affected coating line is not required to meet 35 IAC 218.301 and 218.302, Use of Organic Material, when subject to the limitations of 35 IAC 218.204 [35 IAC 218.209].

7.1.5 Control Requirements/Production Limits

None

7.1.6 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:

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

7.1.7 Testing Requirements / Work Practices

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

- a. Upon request by the Illinois EPA or USEPA, the VOM content of specific coatings used on the affected coating line shall be determined according to USEPA Reference Method 24 or 24A of 40 CFR 60, Appendix A.
- b. The Permittee may test the materials in accordance with these methods or the supplier of a material may provide documentation, e.g., material safety data sheets (MSDS), for such testing that reflects the appropriate method.

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with Conditions 5.5.1 and 7.1.3 pursuant to Section 39.5(7)(b) of the Act and 35 IAC 218.211:

- a. The following records shall be kept for the use of coatings:
  - i. The name and identification number of each coating as applied each day on each affected coating line; [35 IAC 218.211(c)(2)(A) and 218.211(d)(2)(A)]
  - 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; [35 IAC 218.211(c)(2)(B) and 218.211(d)(2)(B)]
  - iii. When complying with the coating VOM content limit of Condition 7.1.3(b)(i) by using a daily-weighted average VOM content of Condition 7.1.3(b)(iii), the following records shall also be maintained:
    - A. The 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 [35 IAC 218.211(d)(2)(B)]
    - B. The daily-weighted average VOM content of all coatings as applied on each affected coating line as calculated by the procedures of Condition 7.1.12(a)(ii). [35 IAC 218.211(d)(2)(C)]
  - iv. Total volume of coating used (minus water and any compounds specifically exempted from the definition of VOM) each month in gallons.
  - v. Total volume of coating reclaimed (minus water and any compounds specifically exempted from the definition of VOM) each month in gallons.

- vi. VOM emissions from the use of coatings in pounds per month and tons per year. This shall be calculated using the data from Condition 7.1.9 (a)(i), (ii), (iii), (iv), (v) and the procedures of Condition 7.1.12(c)(i).
  - vii. The Permittee shall maintain the results of any coating analysis as required by Conditions 7.1.7.
- b. The following records shall be kept for the use of cleanup solvents:
- i. Name and identification of each cleanup solvent used;
  - ii. VOM content of each cleanup solvent used in weight percent;
  - iii. Amount of each cleanup solvent used in pounds per month and tons per year.
  - iv. Amount of cleanup solvent reclaimed for reuse or sent off site for disposal.
  - v. VOM emissions from the use of cleanup solvents in pounds per month and tons per year. This shall be calculated using the data from Condition 7.1.9 (b)(i),(ii), (iii), (iv) and the procedures of Condition 7.1.12(c)(i).
- c. The following records shall be kept for natural gas usage:
- i. Amount of natural gas in standard cubic feet per month and standard cubic feet per year.
  - ii. Emissions of NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOM pounds per month and tons per year.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected coating line with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act and 35 IAC 218.211. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Any record showing violation of Condition 7.1.3(b) 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(c)(3)(A) and 35 IAC 218.211(d)(3)(A)]

- b. A notification shall be sent within 30 days of changing the method of compliance with Condition 7.1.3(b)(i) or Condition 7.1.3(b)(iii). [35 IAC 218.211(c)(3)(B) and 218.211(d)(3)(B)]

7.1.11 Operational Flexibility / Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to changing of any type of coating or solvent as long as the coating, as applied, complies with Condition 7.1.3(b) without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102.

7.1.12 Compliance Procedures

- a. Compliance with the VOM content limitation of Condition 7.1.3(b) for coatings used on an affected coating line shall be demonstrated by the following methods:
  - i. When using compliant coatings exclusively, compliance is addressed by VOM testing in accordance with Condition 7.1.7 and the recordkeeping required by Condition 7.1.9(a)(vii).
  - ii. When using the daily weighted average of VOM content, compliance is addressed by the testing requirements of Condition 7.1.7 and the record of Condition 7.1.9(a)(vii) and determined by averaging the VOM content of two or more coatings as applied on an affected coating line during any day, taking into account the fraction of total coating volume that each coating represents, as calculated with the following equation: [35 IAC 211.1670]

$$VOM_w = \left[ \sum_{i=1}^n V_i C_i \right] / V_T$$

Where:

VOM<sub>w</sub> = The average VOM content of two or more coatings as applied each day

on an affected coating line in units of kg VOM/l (lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM).

$n$  = The number of different coatings as applied each day on an affected coating line.

$V_i$  = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).

$C_i$  = The VOM content of each coating as applied each day on an affected coating line in units of kg VOM/l (lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM).

$V_T$  = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on an affected coating line in units of l (gal).

- b. Compliance provisions addressing the opacity limit of Condition 5.2.2(c) and SO<sub>2</sub> limit of Condition 5.2.2(d) as referenced by Condition 7.1.3(c) are not set by this permit as compliance is assumed to be achieved by the use of natural gas in the oven on an affected coating line.
- c. Compliance provisions addressing Condition 7.1.3(d) is not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected coating.
- d. To determine compliance with the emission limitations of Condition 5.5.1 for the purpose of establishing fees and the records of Conditions 7.1.9(a)(vi) and 7.1.9(b)(v), the emissions from an affected coating line shall be calculated by the following methods:
  - i. Emissions of VOM from the process of coating and clean-up:

$$\sum_{i=1}^n (V_{Ci} - R_{Ci}) C_{Ci}$$

Where:

- i = Subscript denoting a specific coating;
- n = The number of different coatings used during the month;
- V<sub>C</sub> = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each month on an affected coating line in units of gallons.
- R<sub>C</sub> = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) reclaimed each month on an affected coating line in units of gallons.
- C<sub>C</sub> = The VOM content of each coating as applied each month on an affected coating line in units of lbs VOM/gal of coating (minus water and any compounds which are specifically exempted from the definition of VOM).

$$\sum_{i=1}^l [M_{Si} - R_{Si}] C_{Si}$$

Where:

- i = Subscript denoting a specific solvent;
- l = The number of different solvents used during a month;
- M<sub>S</sub> = The amount of each cleanup solvent used each month on an affected coating line in units of pounds.
- R<sub>S</sub> = The amount of each cleanup solvent reclaimed each month on an affected coating line in units of pounds.

C<sub>s</sub> = The VOM content of each cleanup solvent used each month on an affected coating line in weight percent.

Total VOM emissions = Coating VOM emissions + Cleanup solvent VOM emissions

ii. Emissions from the combustion of fuel in the cure oven:

<u>Pollutant</u>	<u>Natural Gas Emission Factor</u> <u>(lbs/10<sup>6</sup> ft<sup>3</sup>)</u>
CO	84.0
NO <sub>x</sub>	100.0
PM	7.6
SO <sub>2</sub>	0.6
VOM	5.5

Emission factors for NO<sub>x</sub>, PM, SO<sub>2</sub> and VOM for uncontrolled natural gas combustion in small ovens ( < 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and AP-42, Volume I, 5<sup>th</sup> Edition, March 1998.

$$E = U \times F$$

Where:

E = Emissions per Pollutant (ton/month)

U = Natural Gas Usage (scf/month)

F = Pollutant Emission Factor (lbs/Mft<sup>3</sup>)

- 7.2 Unit 02 - Steel Drum and Drum Parts Coating Lines  
 Control 02 - Regenerative Thermal Oxidizer, Fiberglass Paint Filter & Paper Paint Filter

7.2.1 Description

The steel drum coating operation includes two lines: the steel drum line and steel drum parts line. The steel drum parts line manufactures and applies the interior coating to drum tops, bottoms, and removable covers. The steel drum line begins with steel sheets fed into a drum forming process that proceeds to the drum lining process where an interior coating is applied by the walking beam lining machine and dried in an oven. The tops and bottoms are attached to the drum shell at the drum seamers that then go through a series of tests. The exterior of the assembled drums are coated at the drum painting machine, dried in an oven and tested at the helium tester. The VOM and the PM emissions from the entire coating line are controlled by a regenerative thermal oxidizer, fiberglass paint filters, and paper paint filters.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Walking Beam Lining Machine and Drum 2nd Hi-Bake Oven	Interior coating is applied to drum shell and dried in an oven.	Regenerative Thermal Oxidizer for VOM emissions.
Drum Seamer (2 Units)	Applies sealant at the seamer.	
Paint Machine and Oven	Exterior coating is applied to drum and dried in an oven.	Fiberglass Paint Filter, Paper Paint Filter for PM emissions.
Drum Parts Paint Oven and Drum Part Lacquer Machine	Interior coating is applied to drum parts and dried in an oven.	

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit specific conditions, is a coating line that applies coating to the surface of steel drums and drum parts (miscellaneous metal parts and products) and is comply with 35 IAC Part 218, Subpart F by using an alternative add-on control technology as allowed by 35 IAC 218.207. Requirements of 35 IAC 218.207 are addressed further in Condition 7.2.5.

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

- i. The Permittee shall not 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)].
- ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation

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

Where:

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

\* For coating lines the process weight rate is the weight of the coating only.

A. For process weight rates up to 408 MG/hr (450 T/hr):

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

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

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

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.321].

- c. The natural gas fired oven of an affected coating line is subject to the opacity and SO<sub>2</sub> emission limits identified in Conditions 5.2.2(c) and (d), respectively.

#### 7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on an affected coating line not being subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.209, which excludes the affected coating line from these requirements.

#### 7.2.5 Control Requirements

- a. An affected coating line shall be equipped with a capture system and control device (the RTO) that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device (the RTO) has a 90 percent efficiency. [35 IAC 218.207(d)]
- b. The RTO combustion chamber shall be preheated to the temperature recommended by the manufacturer, but not less than the temperature (3-hour average) achieved during the most recent destruction test of Condition 7.2.7 where compliance was demonstrated with Condition 7.2.5(a) above, and maintained during the coating operation.

#### 7.2.6 Emission Limitations

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

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

Upon written request from the Illinois EPA or the USEPA, the Permittee shall determine the overall reduction efficiency of the emission control system on the affected coating lines by the procedures specified by 35 IAC 218.105(c), (d), and (e), as described below:

a. Pursuant to 35 IAC 218.105(c)(2)(A), the capture efficiency of an affected coating line control system is assumed to be 100 percent if the capture system is a permanent total enclosure (PTE) meeting the specifications given in 35 IAC Part 218, Appendix B, Procedure T, otherwise, the capture efficiency will have to be measured using one of the four protocols given below. Any error margin associated with a test protocol may not be incorporated into the results of a capture efficiency test.

i. Gas/gas method using temporary total enclosure (TTE). The Illinois EPA and USEPA specifications to determine whether a temporary enclosure is considered a TTE are given in Procedure T of Appendix B of this Part. The capture efficiency equation to be used for this protocol is:

$$CE = G_w / (G_w + F_w)$$

where:

CE = Capture efficiency, decimal fraction;

$G_w$  = Mass of VOM captured and delivered to control device using a TTE;

$F_w$  = Mass of fugitive VOM that escapes from a TTE.

Procedure G.2 contained in Appendix B of 35 IAC 218 is used to obtain  $G_w$ . Procedure F.1 in Appendix B of 35 IAC 218 is used to obtain  $F_w$  [35 IAC 218.105(c)(2)(A)].

ii. Liquid/gas method using TTE. The Illinois EPA and USEPA specifications to determine whether a temporary enclosure is considered a TTE are given in Procedure T of 35 IAC 218, Appendix B. The capture efficiency equation to be used for this protocol is:

$$CE = (L - F_w) / L$$

Where:

CE = Capture efficiency, decimal fraction;

L = Mass of liquid VOM input to the affected coil coating line;

$F_w$  = Mass of fugitive VOM that escapes from a TTE.

Procedure L contained in Appendix B of 35 IAC 218 is used to obtain L. Procedure F.1 in Appendix B of 35 IAC 218 is used to obtain  $F_w$  [35 IAC 218.105(c)(2)(B)].

- iii. Gas/gas method using the building or room (building or room enclosure), in which the affected coil coating line is located, as the enclosure and in which "F" and "G" are measured while operating only the affected coil coating line. All fans and blowers in the building or room must be operated as they would under normal production. The capture efficiency equation to be used for this protocol is:

$$CE = G / (G + F_b)$$

Where:

CE = Capture efficiency, decimal fraction.

G = Mass of VOM captured and delivered to control device.

$F_b$  = Mass of fugitive VOM that escapes from a TTE.

Procedure G.2 contained in Appendix B of 35 IAC 218 is used to obtain G. Procedure F.2 in Appendix B of 35 IAC 218 is used to obtain  $F_b$  [35 IAC 218.105(c)(2)(C)].

- iv. Liquid/gas method using the building or room (building or room enclosure), in which the affected coil coating line is located, as the enclosure and in which "F" and "L" are measured while operating only the affected coil coating line. All fans and blowers in the building or room must be operated as they would under normal production. The capture efficiency equation to be used for this protocol is:

$$CE = (L - F_b) / L$$

Where:

CE = Capture efficiency, decimal fraction;

L = Mass of liquid VOM input to the affected coil coating line;

$F_b$  = Mass of fugitive VOM that escapes from building enclosure.

Procedure L contained in Appendix B of 35 IAC 218 is used to obtain L. Procedure F.2 in Appendix B of 35 IAC 218 is used to obtain  $F_b$  [35 IAC 218.105(c)(2)(D)].

- b. If utilizing a PTE or TTE, the Permittee must demonstrate that either enclosure meets the requirement given in 35 IAC 218, Appendix B, Procedure T for a PTE or TTE during testing, pursuant to 35 IAC 218.105(c)(3)(D) and 218.105(c)(3)(E), respectively. The Permittee must also provide documentation that the quality assurance criteria for a TTE have been achieved [35 IAC 218.105(c)(3)(D), (E)].
- c. Pursuant to 35 IAC 218.105(d)(1), the control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified in 35 IAC 218.105(f) incorporated by reference by 35 IAC 218.112 from Appendix A of 40 CFR, Part 60 as given below.

Method 1 or 1A for sample and velocity traverses;  
Method 2, 2A, 2C or 2D for velocity and volumetric flow rates;  
Method 3 for gas analysis;  
Method 4 for stack gas moisture;  
Method 18, 25 or 25A as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases.

\*Methods 2, 2A, 2C, 2D, 3 and 4, shall be performed, as applicable, at least twice during each test run.

- d. Pursuant to 35 IAC 218.105(e), the overall efficiency of the emission control system shall be determined as the product of the capture system efficiency and the control device efficiency. In those cases in which the overall efficiency is being determined for an entire line, the capture efficiency used to calculate the product of the capture and control efficiency is the total capture efficiency over the entire line.

#### 7.2.8 Monitoring Requirements

- a. The regenerative thermal oxidizer shall use an Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained and operated according to vendor specifications at all times the regenerative thermal oxidizer is in use. The continuous monitoring equipment shall monitor and record the combustion chamber temperature of the regenerative thermal oxidizer. [35 IAC 281.105(d)(2)].
- b. The Permittee shall visually inspect the filters on a regular basis in order to ensure proper operation of the filters and the need for replacement.

#### 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 an affected coating line to demonstrate compliance with Conditions 5.5.1, 7.2.3 and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

- a. The owner or operator of an affected coating line shall collect and record all of the following information each day for an affected coating line and maintain the information at the source for a period of five (5) years [35 IAC 218.211 (e)(2)(B),(C),(D)]:
  - i. Control device monitoring data.
  - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line.
  - iii. A maintenance log for the capture system, control device, monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. The Permittee must maintain a copy of the capture efficiency protocol submitted to the Illinois EPA and the USEPA on file. All results of the appropriate test methods and capture efficiency protocols must be reported to the Illinois EPA within sixty (60) days of the test date. A copy of the results must be kept on file with the source for a period of five (5) years [35 IAC 218.105(c)(3)(A)].
- c. Coating usage, in gallons per month and gallons per year, for each coating along with the physical

properties of each coating, i.e. VOM content, density, etc.

- d. The Permittee shall maintain the results of any tests analysis as required by Conditions 7.2.7.
- e. The following records shall be kept for the use of cleanup solvents:
  - i. Name and identification of each cleanup solvent used;
  - ii. VOM content of each cleanup solvent used in weight percent;
  - iii. Amount of each cleanup solvent used in pounds per month and tons per year;
  - iv. Amount of cleanup solvent reclaimed for reuse or sent off site for disposal.
- f. Amount of natural gas in standard cubic feet per month and standard cubic feet per year.
- g. VOM emissions from the coating operation, the use of coating cleanup solvents, and natural gas in pounds per month and tons per year. This shall be calculated using the data from other records required by this Condition and the procedures of Condition 7.2.12.

#### 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an 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. The Permittee is required to notify the Illinois EPA and the USEPA of any changes made to capture or control equipment and a new test may be required by the Illinois EPA and the USEPA [35 IAC 218.105(c)(3)(B)].
- b. The Permittee must notify the Illinois EPA 30 days prior to performing any capture efficiency or control test. At that time, the Permittee must notify the Illinois EPA which capture efficiency protocol and control device test methods will be used [35 IAC 218.105(c)(3)(C)].

- c. The Permittee shall notify the Illinois EPA within 30 days if a violation of Condition 7.2.5(a) occurs [35 IAC 218.211(e)(3)(A)].

7.2.11 Operational Flexibility

The capture system and control device shall be operated at all times an affected coating line is in operation except operation is not required during the period of November 1 of any year to April 1 of the following year provided that the operation of such devices is not required for purposes of occupational safety of health, or for the control of toxic substances, odor nuisances, or other regulated pollutants [35 IAC 218.107 and 218.107(a)]. Shutting down the regenerative thermal oxidizer during the above specified period, the Permittee shall comply with the coating VOM content limitation corresponding to the miscellaneous metal parts and products coating used by applying the daily-weight average method.

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.5(a) is addressed by continuous monitoring in accordance with Condition 7.2.8, testing in accordance with Condition 7.2.7, and the recordkeeping required by Condition 7.2.9.
- b. Compliance provisions addressing Condition 7.2.3(b) and (c) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affected coating line.
- c. To determine compliance with Condition 5.5.1 and records of Condition 7.2.9, VOM emissions from an affected coating line shall be calculated based on the following:

$$U_v = U_1 \times V_1$$

Where:

$U_v$  = Coating VOM Usage (tons/month)

$U_1$  = Coating Usage (tons/month)

$V_1$  = Coating VOM Content (wt. %)

$$E_1 = U_v(\eta/100)[1-(\epsilon/100)]+U_v[1-\eta/100]$$

Where:

$E_1$  = Coating VOM Emissions (tons/month)

$U_v$  = Coating VOM Usage (ton/month)

$\eta$  = Capture Efficiency (%)\*

$\epsilon$  = Control Efficiency (%)\*

\* From most recent stack test

$$E_2 = U_2 \times V_2$$

Where:

$E_2$  = Cleanup Solvent VOM Emissions (ton/month)

$U_2$  = Cleanup Solvent Usage (ton/month)

$V_2$  = Cleanup Solvent VOM Content (wt. %)

$$E_3 = C_3 \times V_3$$

Where:

$E_3$  = VOM Containing Waste Credit (tons/month)

$C_3$  = VOM Containing Waste Collected (tons/month)

$V_3$  = VOM Containing Waste VOM Content (wt. %)

$$E_T = E_1 + E_2 - E_3$$

Where:

$E_T$  = Total VOM Emissions (ton/month)

- d. Fuel combustion emissions from an affected oven shall be calculated based on the following emission factors and formulas:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lbs/10<sup>6</sup> ft<sup>3</sup>)</u>
CO	84.0
NO <sub>x</sub>	100.0
PM	7.6
SO <sub>2</sub>	0.6
VOM	5.5

Emission factors for NO<sub>x</sub>, PM, SO<sub>2</sub> and VOM for uncontrolled natural gas combustion in oven (< 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and AP-42, Volume I, 5th Edition, March 1998.

$$E = U \times F$$

Where:

E = Emissions per Pollutant (ton/month)

U = Natural Gas Usage (therms/month)

F = Pollutant Emission Factor (lbs/Mft<sup>3</sup>)

- 7.3 Unit 03 - Drum Parts Flash-Off Oven  
 Control 03 - Regenerative Thermal Oxidizer

7.3.1 Description

The flash-off oven evaporates any residual lubricant left from the drum parts forming process.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Drum Parts Flash-Off Oven	Evaporate residual lubricant	Regenerative Thermal Oxidizer

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected oven" for the purpose of these unit-specific conditions, is an oven that evaporates the residual lubricant from drum parts that is subject to 35 IAC Part 218, Subpart TT. Requirements of 35 IAC 218, Subpart TT are addressed further in Condition 7.3.5.
- b. An affected oven is subject to the emission limits identified in Condition 5.2.2(c) and (d).
- c. An affected oven is subject to 35 IAC 218 Subpart G, Use of Organic Material, which provides that:
  - i. 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 Condition 7.3.3(c)(ii) and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 218.301].
  - ii. Emissions of organic material in excess of those permitted by Condition 7.3.3(c)(i) are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water [35 IAC 218.302(a)].

7.3.4 Non-Applicability of Regulations of Concern

None

7.3.5 Control Requirements and Operating Requirements

- a. An affected oven is subject to 35 IAC 218.986(a), which provides that every owner or operator of an emission unit subject to 35 IAC 218 Subpart TT shall employ emission capture and control equipment which achieves an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit.
- b. The regenerative thermal oxidizer combustion chamber shall be preheated to the temperature recommended by the manufacturer, but not less than the temperature (3-hour average) achieved during the most recent destruction test of Condition 7.3.7 where compliance was demonstrated with Condition 7.3.5(a), and maintained during the coating operation.

7.3.6 Emission Limitations

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

Emissions from the affected oven shall not exceed the following limits:

<u>Pollutant</u>	<u>Lbs/hr</u>	<u>(Ton/Year)</u>
VOM	3.99	8.30
NO <sub>x</sub>	0.1	0.44
CO	0.1	0.44

The above limitations were established in Permit 95100083, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

These limits are based on the maximum lubricant usage, the maximum hours of operation, and required 81% overall control efficiency for the afterburner pursuant to 35 IAC 218.986(a). 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 total) [T1].

7.3.7 Testing Requirements

Upon request by the Illinois EPA, it is necessary to conduct testing to demonstrate compliance with 35 IAC 218.986, the Permittee of a VOM emission unit subject to

the requirements of 35 IAC Subpart TT shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105. Nothing in 35 IAC 218.988 shall limit the authority of the USEPA pursuant to the Clean Air Act, as amended, the require testing [35IAC 218.988(a) and (b)].

a. Pursuant to 35 IAC 218.105(c)(2)(A), the capture efficiency of an affected oven control system is assumed to be 100 percent if the capture system is a permanent total enclosure (PTE) meeting the specifications given in 35 IAC Part 218, Appendix B, Procedure T, otherwise, the capture efficiency will have to be measured using one of the four protocols given below. Any error margin associated with a test protocol may not be incorporated into the results of a capture efficiency test.

i. Gas/gas method using temporary total enclosure (TTE). The Illinois EPA and USEPA specifications to determine whether a temporary enclosure is considered a TTE are given in Procedure T of Appendix B of this Part. The capture efficiency equation to be used for this protocol is:

$$CE = G_w / (G_w + F_w)$$

Where:

CE = Capture efficiency, decimal fraction;

$G_w$  = Mass of VOM captured and delivered to control device using a TTE;

$F_w$  = Mass of fugitive VOM that escapes from a TTE.

Procedure G.2 contained in Appendix B of 35 IAC 218 is used to obtain  $G_w$ . Procedure F.1 in Appendix B of 35 IAC 218 is used to obtain  $F_w$  [35 IAC 218.105(c)(2)(A)].

ii. Liquid/gas method using TTE. The Illinois EPA and USEPA specifications to determine whether a temporary enclosure is considered a TTE are given in Procedure T of 35 IAC 218, Appendix B. The capture efficiency equation to be used for this protocol is:

$$CE = (L - F_w) / L$$

Where:

CE = Capture efficiency, decimal fraction;

L = Mass of liquid VOM input to the affected coil coating line;

F<sub>w</sub> = Mass of fugitive VOM that escapes from a TTE.

Procedure L contained in Appendix B of 35 IAC 218 is used to obtain L. Procedure F.1 in Appendix B of 35 IAC 218 is used to obtain F<sub>w</sub> [35 IAC 218.105(c)(2)(B)].

- iii. Gas/gas method using the building or room (building or room enclosure), in which the affected coil coating line is located, as the enclosure and in which "F" and "G" are measured while operating only an affected oven. All fans and blowers in the building or room must be operated as they would under normal production. The capture efficiency equation to be used for this protocol is:

$$CE = G / (G + F_b)$$

Where:

CE = Capture efficiency, decimal fraction.

G = Mass of VOM captured and delivered to control device.

F<sub>b</sub> = Mass of fugitive VOM that escapes from a TTE.

Procedure G.2 contained in Appendix B of 35 IAC 218 is used to obtain G. Procedure F.2 in Appendix B of 35 IAC 218 is used to obtain F<sub>b</sub> [35 IAC 218.105(c)(2)(C)].

- iv. Liquid/gas method using the building or room (building or room enclosure), in which an affected oven is located, as the enclosure and in which "F" and "L" are measured while operating only an affected oven. All fans and blowers in the building or room must be operated as they would under normal production. The capture efficiency equation to be used for this protocol is:

$$CE = (L - F_b) / L$$

Where:

CE = Capture efficiency, decimal fraction;

L = Mass of liquid VOM input to the affected coil coating line;

F<sub>b</sub> = Mass of fugitive VOM that escapes from building enclosure.

Procedure L contained in Appendix B of 35 IAC 218 is used to obtain L. Procedure F.2 in Appendix B of 35 IAC 218 is used to obtain F<sub>b</sub> [35 IAC 218.105(c)(2)(D)].

b. If utilizing a PTE or TTE, the Permittee must demonstrate that either enclosure meets the requirement given in 35 IAC 218, Appendix B, Procedure T for a PTE or TTE during testing, pursuant to 35 IAC 218.105(c)(3)(D) and 218.105(c)(3)(E), respectively. The Permittee must also provide documentation that the quality assurance criteria for a TTE have been achieved [35 IAC 218.105(c)(3)(D), (E)]

c. Pursuant to 35 IAC 218.105(d)(1), the control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified in 35 IAC 218.105(f) incorporated by reference by 35 IAC 218.112 from Appendix A of 40 CFR, Part 60 as given below.

Method 1 or 1A for sample and velocity traverses;

Method 2, 2A, 2C or 2D for velocity and volumetric flow rates;

Method 3 for gas analysis;

Method 4 for stack gas moisture;

Method 18, 25 or 25A as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases.

\*Methods 2, 2A, 2C, 2D, 3 and 4, shall be performed, as applicable, at least twice during each test run.

d. Pursuant to 35 IAC 218.105(e), the overall efficiency of the emission control system shall be determined as the product of the capture system efficiency and the

control device efficiency. In those cases in which the overall efficiency is being determined for an entire line, the capture efficiency used to calculate the product of the capture and control efficiency is the total capture efficiency over the entire line.

#### 7.3.8 Monitoring Requirements

The regenerative thermal oxidizer shall use an Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained and operated according to vendor specifications at all times the regenerative thermal oxidizer is in use. The continuous monitoring equipment shall monitor and record the combustion chamber temperature of the regenerative thermal oxidizer [35 IAC 281.105(d)(2)].

#### 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 oven to demonstrate compliance with Condition 5.5.1 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee of an affected oven shall collect and record all of the following information each day for an affected oven and maintain the information at the source for a period of five years [35 IAC 218.991 (a)(2)(A),(B),(C)]:
  - i. Control device monitoring data.
  - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line.
  - iii. A maintenance log for the capture system, control device, monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. Amount of natural gas in standard cubic feet per month and standard cubic feet per year.
- c. Amount of lubricant in gallons per hour and gallons per year.
- d. Emissions of NO<sub>x</sub>, CO in tons per calendar year and emissions of VOM in pounds per month and tons per year.

#### 7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected oven 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. Emissions of VOM from an affected oven in excess of the limits specified in Conditions 7.3.6.
- b. The Permittee of a subject VOM emission source shall notify the Illinois EPA of any violation of the requirements of 35 IAC Subpart TT by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.991(a)(3)(A)].
- c. The Permittee is required to notify the Illinois EPA and the USEPA of any changes are made to capture or control equipment and a new test may be required by the Illinois EPA and the USEPA [35 IAC 218.105(c)(3)(B)].
- d. The Permittee must notify the Illinois EPA 30 days prior to performing any capture efficiency or control test. At that time, the Permittee must notify the Illinois EPA which capture efficiency protocol and control device test methods will be used [35 IAC 218.105(c)(3)(C)].

#### 7.3.11 Operational Flexibility

The capture system and control device shall be operated at all times an affected oven is in operation except operation is not required during the period of November 1 of any year to April 1 of the following year provided that the operation of such devices is not required for purposes of occupational safety of health, or for the control of toxic substances, odor nuisances, or other regulated pollutants [35 IAC 218.107 and 218.107(a)]. However, shutting down the regenerative thermal oxidizer during the above specified period shall not cause an exceedance of the annual emission limit of Condition 7.3.6 where compliance is demonstrated during any consecutive twelve months.

#### 7.3.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.3.3(b) is not set by this permit as compliance is assumed to be achieved by the normal work practices and

maintenance activities inherent in operation of an affected oven.

b. Compliance with Conditions 7.3.5(a) and 7.3.3(c) are addressed by continuous monitoring in accordance with Condition 7.3.8, testing in accordance with Condition 7.3.7, and the recordkeeping required by Condition 7.3.9.

c. To determine compliance with Condition 5.5.1 and 7.3.6, VOM emissions from the affected oven shall be calculated based on the following:

$$U_v = U_1 \times V_1$$

Where:

$U_v$  = Lubricant VOM Usage (tons/month)

$U_1$  = Lubricant Usage (tons/month)

$V_1$  = Lubricant VOM Content (wt. %)

$$E = U_v(\eta/100)[1-(\epsilon/100)] + U_v[1-\eta/100]$$

Where:

$E$  = Lubricant VOM Emissions (tons/month)

$U_v$  = Lubricant VOM Usage (ton/month)

$\eta$  = Capture Efficiency (%)\*

$\epsilon$  = Control Efficiency (%)\*

\* from most recent stack test

d. Fuel combustion emissions from an affected oven shall be calculated based on the following emission factors and formulas:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lbs/10<sup>6</sup> ft<sup>3</sup>)</u>
CO	84.0
NO <sub>x</sub>	100.0
PM	7.6
SO <sub>2</sub>	0.6
VOM	5.5

Emission factors for NO<sub>x</sub>, PM, SO<sub>2</sub> and VOM for uncontrolled natural gas combustion in oven (< 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and AP-42, Volume I, 5th Edition, March 1998.

$$E = U \times F$$

Where:

E = Emissions per Pollutant(ton/month)

U = Natural Gas Usage (therms/month)

F = Pollutant Emission Factor (lbs/Mft<sup>3</sup>)

7.4 Unit 04 - Soil Vapor Extraction System  
 Control 04 - None

7.4.1 Description

The soil vapor extraction system is used to extract the underground organic compounds which accidentally leaked from a storage tank.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Soil Vapor Extraction System	Reduce the underground organic compound concentration	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected system", for the purpose of these unit-specific conditions, is the soil vapor extraction system.
- b. An affected system at the source is subject to 35 IAC 218.301, which requires that:

The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

7.4.4 Non-Applicability of Regulations of Concern

An affected system is not being subject to 35 IAC 218, Subpart TT pursuant to the applicability determination of 35 IAC 218.980(a) and (b).

7.4.5 Control Requirements

In the event that the operation of an affected system results in an odor nuisance the Permittee shall take all appropriate and necessary action, including but not limited to, changes in operating conditions or installation of controls, in order to eliminate the nuisance.

7.4.6 Emission Limitations

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

Emissions from the affected system shall not exceed the following limits:

<u>Lbs/hr</u>	<u>VOM Emissions</u>	<u>(Ton/Year)</u>
0.9		3.9

The above limitations were established in Permit 97040056, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

These limits are based on maximum operation, maximum VOM concentration, and 8,760 hours per year operation. 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 months total) [T1].

7.4.7 Operating Requirements

None

7.4.8 Inspection Requirements

None

7.4.9 Recordkeeping Requirements

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

The Permittee shall keep records of any tests made on water samples to determine VOM concentrations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected system 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

None

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3 on an affected system shall be calculated by the following equation:

$$\begin{array}{rcl} \text{VOM Emission} & = & \text{VOM concentration} \quad * \quad \text{Maximum Air Flow} \\ (\text{lb/hr}) & & (\text{lb/m}^3) \quad \quad \quad (\text{m}^3/\text{hr}) \end{array}$$

- b. Compliance with Condition 7.4.6 on an affected system shall be calculated by the following equation:

$$\begin{array}{rcl} \text{VOM Emission} & = & \text{VOM Emission} \quad * \quad 8,760 \quad / \quad 2,000 \\ (\text{tpy}) & & (\text{lb/hr}) \quad (\text{hr/yr}) \quad (\text{lb/ton}) \end{array}$$

7.5 Unit 05 - Silk Screen Machine  
 Control 05 - None

7.5.1 Description

The silk screen machine applies extreme performance coating as text to the exterior of steel drums.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Silk Screen Machine	Apply Text to Exterior of Steel Drums.	None

7.5.3 Applicability Provisions and Applicable Regulations

a. An "affected coating line", for the purpose of these unit-specific conditions, is silk screen machine that applies extreme performance coating as text to the exterior of steel drums.

b. An affected coating line is subject to 35 IAC 218.204(j), which provides that:

i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for miscellaneous metal parts and products 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 by an affected coating line:

Drum Exterior Coating (Extreme Performance Coating) [35 IAC 218.204(j)(2)(a)]

<u>kg/liter</u>	<u>lb/gallon</u>	
0.42	3.5	(Air dried)

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

iii. An affected coating line may comply with the above listed coating VOM content limits by using a daily-weighted average VOM content and the procedures of Condition 7.5.12(a)(ii). The daily-weighted average method can only be

used for coatings subject to the same numerical VOM content limit (e.g., all coatings used on the line are subject to 3.5 lb/gallon) used that day. [35 IAC 218.205]

- c. An affected coating line is subject to 35 IAC 212.321(a), which provides that:
  - i. The Permittee shall not 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 212.32(a)].
  - ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

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

where:

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

\* For coating lines the process weight rate is the weight of the coating only.

A. For process weight rates up to 408 Mg/hr (450 T/hr):

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

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

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

where:

- P = Process weight rate in metric or English tons per hour, and
- E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.321].

7.5.4 Non-Applicability of Regulations of Concern

An affected coating line is not required to meet 35 IAC 218.301 and 218.302, Use of Organic Material, when subject to the limitations of 35 IAC 218.204 [35 IAC 218.209].

7.5.5 Control Requirements / Production Limits

None

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 line is subject to the following:

Emissions from the affected coating line shall not exceed the following limits:

<u>Throughput (gal/hr)</u>	<u>VOM Emission (lb/hr)</u>	<u>(Ton/yr)</u>
0.28	1.90	8.34

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the affected coating line below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1N].

7.5.7 Testing Requirements/Work Practices

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

- a. Upon request by the Illinois EPA or USEPA, the VOM content of specific coatings used on the affected coating line shall be determined according to USEPA Reference Method 24 or 24A of 40 CFR 60, Appendix A.
- b. The Permittee may test the materials in accordance with these methods or the supplier of a material may provide documentation, e.g., material safety data sheets (MSDS), for such testing that reflects the appropriate method.

7.5.8 Inspection 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 each affected coating line to demonstrate compliance with Conditions 5.5.1 and 7.5.3 pursuant to Section 39.5(7)(b) of the Act and 35 IAC 218.211:

- a. The following records shall be kept for the use of coatings:
  - i. The name and identification number of each coating as applied each day on each affected coating line; [35 IAC 218.211(c)(2)(A) and 218.211(d)(2)(A)]
  - 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; [35 IAC 218.211(c)(2)(B) and 218.211(d)(2)(B)]
  - iii. When complying with the coating VOM content limit of Condition 7.5.3(b)(i) by using a daily-weighted average VOM content of Condition 7.5.3(b)(iii), the following records shall also be maintained:
    - A. The 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 [35 IAC 218.211(d)(2)(B)]

- B. The daily-weighted average VOM content of all coatings as applied on each affected coating line as calculated by the procedures of Condition 7.5.12(a)(ii). [35 IAC 218.211(d)(2)(C)]
  - iv. Total volume of coating used (minus water and any compounds specifically exempted from the definition of VOM) each month in gallons.
  - v. Total volume of coating reclaimed (minus water and any compounds specifically exempted from the definition of VOM) each month in gallons.
  - vi. VOM emissions from the use of coatings in pounds per month and tons per year. This shall be calculated using the data from Condition 7.5.9 (a)(i), (ii), (iii), (iv), (v) and the procedures of Condition 7.5.12(b)(i).
  - vii. The Permittee shall maintain the results of any coating analysis as required by Conditions 7.5.7.
- b. The following records shall be kept for the use of cleanup solvents:
- i. Name and identification of each cleanup solvent used;
  - ii. VOM content of each cleanup solvent used in weight percent;
  - iii. Amount of each cleanup solvent used in pounds per month and tons per year.
  - iv. Amount of cleanup solvent reclaimed for reuse or sent off site for disposal.
  - v. VOM emissions from the use of cleanup solvents in pounds per month and tons per year. This shall be calculated using the data from Condition 7.5.9 (b)(i),(ii), (iii), (iv) and the procedures of Condition 7.5.12(b)(i).

#### 7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected coating line with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act and 35 IAC 218.211.

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

- a. Any record showing violation of Condition 7.5.3(b) 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(c)(3)(A) and 35 IAC 218.211(d)(3)(A)]
- b. A notification shall be sent within 30 days of changing the method of compliance with Condition 7.5.3(b)(i) or Condition 7.5.3(b)(iii). [35 IAC 218.211(c)(3)(B) and 218.211(d)(3)(B)]

#### 7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to changing of any type of coating or solvent as long as the coating, as applied, complies with Condition 7.5.3(b) without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102.

#### 7.5.12 Compliance Procedures

- a. Compliance with the VOM content limitation of Condition 7.5.3(b) for coatings used on an affected coating line shall be demonstrated by the following methods:
  - i. When using compliant coatings exclusively, compliance is addressed by VOM testing in accordance with Condition 7.5.7 and the recordkeeping required by Condition 7.5.9(a)(vii).
  - ii. When using the daily weighted average of VOM content, compliance is addressed by the testing requirements of Condition 7.5.7 and the record of Condition 7.5.9(a)(vii) and determined by averaging the VOM content of two or more coatings as applied on an affected coating line during any day, taking into account the fraction of total coating volume that each coating represents, as calculated with the following equation: [35 IAC 211.1670]

$$VOM_w = [\sum_{i=1}^n V_i C_i] / V_T$$

Where:

- $VOM_w$  = The average VOM content of two or more coatings as applied each day on an affected coating line in units of kg VOM/l (lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM).
- $n$  = The number of different coatings as applied each day on an affected coating line.
- $V_i$  = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).
- $C_i$  = The VOM content of each coating as applied each day on an affected coating line in units of kg VOM/l (lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM).
- $V_T$  = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on an affected coating line in units of l (gal).

- b. To determine compliance with Conditions 7.5.6 and 5.5.1, the emissions from an affected coating line shall be calculated by the following methods:

Emissions of VOM from the process of coating and clean-up:

$$\sum_{i=1}^n (V_{Ci} - R_{Ci}) C_{Ci}$$

Where:

- i = Subscript denoting a specific coating;
- n = The number of different coatings used during the month;
- V<sub>C</sub> = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each month on an affected coating line in units of gallons.
- R<sub>C</sub> = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) reclaimed each month on an affected coating line in units of gallons.
- C<sub>C</sub> = The VOM content of each coating as applied each month on an affected coating line in units of lbs VOM/gal of coating (minus water and any compounds which are specifically exempted from the definition of VOM).

$$\sum_{i=1}^l [M_{Si} - R_{Si}]C_{Si}$$

Where:

- i = Subscript denoting a specific solvent;
- l = The number of different solvents used during a month;
- M<sub>S</sub> = The amount of each cleanup solvent used each month on an affected coating line in units of pounds.
- R<sub>S</sub> = The amount of each cleanup solvent reclaimed each month on an affected coating line in units of pounds.
- C<sub>S</sub> = The VOM content of each cleanup solvent used each month on an affected coating line in weight percent.

Total VOM emissions = Coating VOM emissions + Cleanup solvent VOM emissions

- c. Compliance provisions addressing Condition 7.5.3(c) is not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of an affect coating line.

## 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 August 25, 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]:

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

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

#### 8.6.2 Test Notifications

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

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

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;

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

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Eisenhower Tower  
1701 South 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 annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by

permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

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

#### 9.9 Certification

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

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

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

##### 9.10.2 Emergency Provision

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

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

#### 9.11 Permanent Shutdown

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

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

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

##### 9.12.2 Reopening and Revision

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

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

#### 9.12.3 Inaccurate Application

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

#### 9.12.4 Duty to Provide Information

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

#### 9.13 Severability Clause

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

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 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: \_\_\_\_\_

KL:psj