

FINAL DRAFT/PROPOSED CAAPP PERMIT
The Interlake Companies Inc.
I.D. No.: 105060AAD
Application No.: 95120057
September 3, 2002

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

The Interlake Companies
Attn: Dennis Berquist
Post Office Box 76
701 Interlake Drive
Pontiac, Illinois 61764

Application No.: 95120057

I.D. No.: 105060AAD

Applicant's Designation:

Date Received: December 6, 1995

Operation of: Manufacturing storage racks, shelving, conveyors and related equipment

Date Issued: !TO BE DETERMINED!

Expiration Date²: !DATE!

Source Location: Jct. Routes 66 and 23, Pontiac, Livingston County

Responsible Official: Dennis Berquist, Safety and Environmental Project Engineer

This permit is hereby granted to the above-designated Permittee to OPERATE a manufacturing of storage racks, shelving, conveyors and related equipment pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:MJP:psj

cc: Illinois EPA, FOS, Region 3
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

The Interlake Material Handling, Inc.
Attn: Dennis Berquist
701 Interlake Drive
Pontiac, Illinois 61764
PHONE #815/844-7191

I.D. No.: 105060AAD
Standard Industrial Classification: 3499, Fabricated Metal
Products, except
machinery and
transportation
equipment

1.2 Owner/Parent Company

Brambles Industries Limited
ABN 22 000 129 868
Level 40, Gateway
1 Macquarie Place
Sidney NSW, 2000
Australia

1.3 Operator

The Interlake Companies, Inc.
Attn: Dennis Berquist
701 Interlake Drive
Pontiac, Illinois 61764
Dennis Berquist, Safety and Environmental Project Engineer
PHONE #815/844-7191

1.4 General Source Description

The Interlake is located in Livingston county at Jct. Routes 66 and 23 in Pontiac. The source design, manufactures, distributes and sells storage racks, shelving, conveyors and related equipment for use in warehouses, distribution centers, retail display and storage applications.

ED Line Process Description:

The electrodeposition (ED) paint line involves cleaning, painting and drying of metal parts. The ED line is used for coating large metal structural components.

Metal parts are placed on an overhead conveyor and are washed in the 1st stage washer. The 1st stage washer contains a water based solution which has been heated to 140-160°F by a 7 mmBtu/hr boiler (ED-1). Next the parts are rinsed in the 2nd and 3rd stage washers. The 2nd and 3rd stage washers are deionized water to ambient temperature to rinse the metal (city water is brought into the plant and is neutralized/deionized on site). The wet parts are transported to the 4.5 mmBtu/hr dry-off oven (ED-2).

The dry parts are then either spray coated or dip coated. The conveyor first transports the parts through two electrostatic hand spray booths with two spray guns in each booth (ED-3a, 3B, 4a, 4b). If the parts are to be painted green, they will pass through the hand spray booths with a coating application and go to the dip tanks where they will be dipcoated (ED-5). If the parts are to be painted any other color, they will be coated at the two electrostatic hand spray booths and upon reaching the dip tank will pass through without being dipped.

Finally, the parts are transported to a 6.6 mmBtu/hr paint bake oven (ED-6). The oven will dry and cure the paint. The dry painted parts will be unloaded and prepared for shipping.

Ransburg Line Process Description:

The Ransburg paint line (RB) involves cleaning, painting and drying of metal parts. The RB line is used for coating straight metal beams and parts.

Metal parts are placed on an overhead conveyor and are washed in the 1st stage washer. The 1st stage washer cleans the metal with a water based solution which has been heated to 140-150°F by two 4.5 mmBtu/hr natural gas fired burners (RB-1a, 1b). Next, the parts are rinsed with water at ambient temperature. Then the parts are washed again with a water based solution which has been heated to 135-150°F by a 3.375 mmBtu/hr natural gas fired burner (RB-2). Finally in the 4th stage washer, parts are rinsed with water at ambient temperature.

The wet parts are then transported to the 4 mmBtu/hr dry-off oven (RB-3). The dry parts are conveyed through a series of four electrostatic disc loop paint applicators (RB-4, 5, 6, 7), followed by two electrostatic hand spray touch up booths with two spray guns in each booth (RB-8a, 8b, 9a, 9b). The part will typically be painted in either the disc loop system or by hand, not both. However, a small amount of parts may be painted in the disc loop and touched up in the hand booth.

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Finally, the parts are transported to a 6.4 mmBtu/hr paint bake oven (RB-10). The oven will dry and cure the paint. The dry painted parts will be unloaded and prepared for shipping.

Heated water and phosphoric acid solution is used for cleaning and preparing metal parts for coating. The operation is called washer. Natural gas is fired to heat the solution.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit

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T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

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:

Small solvent still - Fugitive emissions

- 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:

2 Parts washer

- 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:

Number of Activities	Activity Description	35 IAC Regulatory Citation
1	Waste oil tank	201.210 (a) (10)
53	Space heaters (Natural Gas < 2.5 mmBtu/hr)	201.210(a)(4)
3	Hot water heaters (Natural Gas < 2.5 mmBtu/hr)	201.210(a)(4)
1	IC engine 200HP Emergency Generator	201.210(a)(16)

- 3.1.4 The Permittee has 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	Plant Emission Unit	Description	Emission Control Equipment
01	Ed-1	1-Boiler (E.D. Paint line First stage washer)	
	RB-1a, 1b	2-Boilers (Ransburg Paint line First stage washers)	
	RB-2	1-Boiler (Ransburg Paint line Third stage washer)	
02	Ed-2	E.D. Paint line Dry off oven	
	RB-3	Ransburg Paint Line Dry off oven	
03	ED-3a, 3b, 4a, 4b	2 Electrostatic hand spray booths and Paint bake Oven (6.6 mmBtu/hr)	Filters
	ED-5	Electrostatic dip tank and above bake Oven	Filters
	RB-4, 5, 6, 7	Ransburg paint line disc loop 1,2,3,4 and Paint bake Oven RB-10 (7.7 mmBtu/hr)	Filters
	RB-8a, 8b, 9a, 9b	Ransburg paint line hand spray touch-up booth #1 & #2 and above bake Oven	Filters
		Touch up booth	Filters
04	AN	Cleaver-Brooks CBV-255	Afterburner
05	AMU-1 to AMU-10	Make-up air units	
06		Burn-Off Oven	Afterburner
07		Automatic and manual welding operation -Fume System	Cyclone

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with

the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

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

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall

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

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

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)	241.7
Sulfur Dioxide (SO ₂)	0.3
Particulate Matter (PM)	11.4
Nitrogen Oxides (NO _x)	42.6
HAP, not included in VOM or PM	----
TOTAL	296.0

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources

Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures

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.

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6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Natural Gas Fired Boilers

7.1.1 Description

Heated water and phosphoric acid solution is used for cleaning and preparing metal parts for coating. The operation is called washer. Natural gas is fired to heat the solution.

7.1.2 List of Emission Units and Pollution Control Equipment

Plant Emission Unit	Description	Heat Input	Date Constructed
Ed-1	1-Boiler (E.D. Paint line First stage washer)	7.0 mmBtu/hr	1992
RB-1a, 1b	2-Boilers (Ransburg Paint line First stage washers)	Each 4.5 mmBtu/hr	1987
RB-2	1-Boiler (Ransburg Paint line Third stage washer)	3.37 mmBtu/hr	1987

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions, is the emission unit described in Conditions 7.1.1 and 7.1.2.

7.1.4 Non-Applicability of Regulations of Concern

- a. The New Source Performance Standard for Small - Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units with design heat input capacity of 10 to 100 mmBtu/hr. These boilers are <10 mmBtu/hr, therefore, these rules do not apply.
- b. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, "Use of Organic Material".
- c. The affected boiler is not subject to the requirements of 35 IAC 216.121 or 35 IAC 217.141 because the actual heat input of each of the affected boilers is less than 10 mmBtu/hr.

7.1.5 Operating Requirements

- a. Natural gas shall be the only fuel fired in an affected boiler.

7.1.6 Emission Limitations

None

Note: Emission limits for PM, VOM, NO_x, and CO are not set for the affected boiler as potential to emit in the absence of permit limit is less than the significant and major source thresholds for these pollutants pursuant to Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

7.1.7 Testing Requirements

N/A

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 the affected boiler to demonstrate compliance with Conditions 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas usage (mmcf/yr).
- b. Fuel combustion emissions (ton/yr) as calculated by Section 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected boiler 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:

If there is a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report within 30 days after the deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the deviation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with the emission limits in Condition 5.5.1 and 7.1.3 from each affected boiler shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

Pollutant	Emission Factor lbs/10 ⁶ scf
NO _x	100
PM	7.6
VOM	5.5
SO ₂	0.6

The emission factors for natural gas fired units are from Tables 1.4-1 and 1.4-2, AP-42 Fifth Edition, Volume 1, Supplement D, March, 1998.

Emissions (ton/yr) = (natural gas usage, mmcf/yr) x (the applicable emission factor, lb/mmcf) x (ton/2000 lb)

7.2 Unit 02 - Dry Off Ovens

7.2.1 Description

Metal parts that have been cleaned are dried in the dry off oven. The oven is fired with natural gas.

7.2.1 List of Emission Units and Pollution Control Equipment

Plant Emission Unit	Description	Heat Input	Date Constructed
Ed-2	E.D. Paint Line Dry Off Oven	4.5 mmBtu/hr	1987
RB-3	Ransburg Paint Line Dry Off Oven	4.0 mmBtu/hr	1987

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected dry off oven" for the purpose of these unit-specific conditions is an emission unit described in conditions 7.2.1 and 7.2.2.
- b. Each affected dry off oven is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].
- c. 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 an affected dry off oven, except as provided in Sections 215.302, 215.303, 215.304 of this Part and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 218.301].
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected dry off oven not subject to 35 IAC 217.121 for emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected dry off oven is not by definition a fuel combustion emission unit.
- b. The affected dry off oven is not being subject to 35 IAC 216.121 for emissions of carbon monoxide, because the affected dry off oven is not by definition a fuel combustion emission unit.

7.2.5 Control Requirements

None

7.2.6 Emission Limitations

In addition to Condition 5.2.2, and the source-wide emission limitations in Condition 5.5 and 7.2.3, the affected dry off oven is subject to the following:

None

Note: Emission limits for PM, NO_x and CO are not set for the dry off oven, as potential to emit in the absence of permit limit is less than the significant and major source thresholds for these pollutants pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.

7.2.7 Operating Requirements

None

7.2.8 Inspection Requirements

None

7.2.9 Recordkeeping Requirements

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

- a. Natural gas usage (mmcf/yr).
- b. Fuel combustion emissions (ton/yr) as calculated by Section 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected dry off 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 PM or VOM from an affected dry off oven in excess of the limits specified in Condition 7.2.3, within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the emission limits in Condition 5.5.1 and 7.2.3 from each affected dry off oven shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

Pollutant	Emission Factor lbs/10 ⁶ scf
NO _x	100
PM	7.6
VOM	5.5
SO ₂	0.6

The emission factors for natural gas fired units are from Tables 1.4-1 and 1.4-2, AP-42 Fifth Edition, Volume 1, Supplement D, March, 1998.

Emissions (ton/yr) = (natural gas usage, mmcf/yr) x (the applicable emission factor, lb/mmcf) x (ton/2000 lb)

7.3 Unit 03: Coating Operation

7.3.1 Description

Painted metal parts are dried and paint is cured in the bake oven.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Control Equipment	Date Constructed
ED-3a, 3b, 4a, 4b	2 Electrostatic hand spray booths and Paint bake Oven (6.6 mmBtu/hr)	Filters	1987
ED-5	Electrostatic dip tank and above bake Oven	Filters	1969
RB-4, 5, 6, 7	Ransburg paint line disc loop 1,2,3,4 and Paint bake Oven RB-10 (7.7 mmBtu/hr)	Filters	1987
RB-8a, 8b, 9a, 9b	Ransburg paint line hand spray touch-up booth #1 & #2 and above bake Oven	Filters	1987
	Touch up booth	Filters	1988

7.3.3 Applicability Provisions and Applicable Regulations

a. The "affected coating operation" for the purpose of these unit specific conditions is a coating operation that includes a spray booths with bake oven, dip tank with bake oven and touch-up booths with bake oven which are used to apply coating to a metal substrate.

b. Each affected coating operation at the source is subject to 35 IAC 212.321(a), which requires that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified

in subsection (c) of 35 IAC 212.321 (see also Attachment 1)[35 IAC 212.321(a)].

- c. Each affected coating operation at the source is subject to 35 IAC 215.204(j)(5) for all other coatings which provides that:
- i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:
- | <u>kg/liter</u> | <u>lbs/gallon</u> |
|-----------------|-------------------|
| 0.36 | 3.0 |
- 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.

7.3.4 Non-Applicability of Regulations of Concern

The affected paint booth is not subject to 35 IAC 215.301, Use of Organic Material, pursuant to 35 IAC 215.209, Exemption From General Rule on Use of Organic Material which excludes affected coating operation from this requirement.

7.3.5 Operational and Production Limits and Work Practices

- a. The Permittee shall operate, maintain, and replace the filters in a manner that assures compliance with the conditions of this section.
- b. An adequate inventory of spare filters shall be maintained.

7.3.6 Emission Limitations

In addition to Condition 5.2.2, the source-wide limitations in Condition 5.5, and the VOM content

limitations of Condition 7.3.3(c), the affected coating operations are subject to the following:

- a. Emissions of volatile organic material from this plant shall not exceed 250 tons/year [T1].
- b. Emissions and operations of equipment shall not exceed the following limits [T1].

Equipment	Material used	Gal/hr	Lb VOM/gal	VOM emissions	
				Lb/hr	T/yr
ED-3a, 3b, 4a, 4b	Paint	8.00	3.00	24.00	79.26
	COC 100 Solvent	0.93	7.26	6.76	22.3
ED-5	Paint paste	2.54	0.26	0.66	2.19
	Paint resin	12.72	0.74	9.42	31.09
	Butyl Cellusolve	0.15	7.52	1.13	3.73
	Hexyl Cellusolve	0.05	7.41	0.36	1.18
RB-5, 6, 7, 8a, 8b, 9a, 9b	Paint	8.74	3.00	26.22	86.6
	COC 100 Solvent	0.93	7.26	6.76	22.3
Total				75.31	248.65

- c. These limits are based on maximum hours of operation (6,605 Hr/Yr), maximum material usage and maximum VOM content of the material used. Compliance with the annual limits shall be determined from a running total of 12 months of data [T1].
- d. Compliance with annual limits shall be determined on a daily basis from the sum of the data for the current day plus the preceding 364 days (running 365 days total) [T1].

The above limitations were established in permit 72120551, pursuant to Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to the rule [T1].

7.3.7 Testing Requirements

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

Upon reasonable request by the Illinois EPA, the VOM and HAP content of specific coatings and cleaning solvents

used on each affected coating operation or finishing unit shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 215.208.

This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.3.9.

7.3.8 Inspection Requirements

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

7.3.9 Recordkeeping Requirements

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

- a.
 - i. The name and identification number of each coating, thinner, and cleaning solution as applied on each affected coating operation.
 - ii. The usage of each coating, thinner, and cleaning solution in units of gallons/month.
 - iii. The weight of VOM and HAP per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each month on each affected coating operation.
 - iv. The aggregate monthly and annual VOM and HAP emissions from the affected coating operation based on the coating, thinner, and cleaning solution usage and VOM and HAP content, and with supporting calculations.
 - v. If credit is desired for VOM and HAP emissions from waste materials, aggregate records of materials disposed of or recycled shall be maintained for all coatings, cleaning solvents, and any other VOM containing material use on the affected coating operation on a monthly basis.

- b. Records of the testing of VOM and HAP content (in wt%) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
 - i. Identification of material tested,
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- c. The operating schedule of the affected coating operation.

7.3.10 Reporting Requirements

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

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

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating operation without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.3.7, the source wide emission limitations in Condition 5.5 and 7.1.6 are not exceeded and the affected coating operation remains in compliance with Condition 7.3.3.

7.3.12 Compliance Procedures

a. Compliance with the particulate matter emission limits in condition 7.3.3(b) is assured and achieved by the regular inspection and replacement of the filters as required by this section and the work-practices inherent in operation of the affected coating operation.

b. Compliance with the VOM emission limits in Conditions 5.5, 7.3.3(c) and 7.3.6 shall be based on the recordkeeping requirements in Condition 7.3.9 and by the use of the formulae listed below:

VOM = Coating, Thinner, and Cleaning Solution Usage
(gal) x Density (lb/gal) x VOM Content (% by wt.)

c. Compliance of each coating with the VOM emission limitations in Condition 7.3.3(c) shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.3.7 or by use of the formulae listed below:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D],$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

W = $3(w_i/d_i)$,

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, in lb/gal and the summation 3 is applied over water and all exempt compounds i, in the coating.

d. To determine compliance with Condition 5.5.1, fuel combustion emissions from the natural gas-fired bake oven shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

FINAL DRAFT/PROPOSED CAAPP PERMIT
The Interlake Companies Inc.
I.D. No.: 105060AAD
Application No.: 95120057
September 3, 2002

Pollutant	Emission Factor lbs/10 ⁶ scf
NO _x	100
PM	7.6
VOM	5.5
SO ₂	0.6

The emission factors for natural gas fired units are from Tables 1.4-1 and 1.4-2, AP-42 Fifth Edition, Volume 1, Supplement D, March, 1998.

Emissions (ton/yr) = (natural gas usage, mmcf/yr) x (the applicable emission factor, lb/mmcf) x (ton/2000 lb)

7.4 Unit 04: Incinerator

7.4.1 Description

The incinerator is used for on-site disposal of general non hazardous plant refuse and paint filters. The incinerator is of "multiple-chamber" design, with a primary combustion chamber (into which waste is charged) followed by a secondary combustion chamber. Efficient combustion is maintained by natural gas fired supplementary burners installed in each chamber.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date Constructed
AN	Cleaver-Brooks CBV-255	Secondary Combustion Chamber with Burner	1992

7.4.3 Applicable Regulations

- a. An "affected incinerator" for the purpose of these unit-specific conditions is an emission unit described in conditions 7.4.1 and 7.4.2.
- b. Emissions of PM from any incinerator, for which construction or modification commenced on or after April 14, 1972, shall not exceed 229 mg/standard cubic meter (0.1 grain/scf) of effluent gases, corrected to 12 percent carbon dioxide [35 IAC 212.181(d)].
- c. Emissions of CO from any incinerator shall not exceed 500 ppm, corrected to 50 percent excess air [35 IAC 216.141].
- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Sections 215.302, 215.303, 215.304 of this Part and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 215.301].

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected plant incinerator is not subject to 35 IAC 217.121 for emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected plant incinerator is not by definition a fuel combustion emission unit.

7.4.5 Operating Requirements and Work Practices

- a.
 - i. The secondary combustion chamber of the incinerator shall be preheated to the 1400^oF prior to introducing waste into the incinerator.
 - ii. This temperature shall be maintained until burnout of waste in the primary chamber is completed.
- b. The condition of the incinerator shall be inspected on a periodic basis for the presence of deficiencies and any deficiency shall be expeditiously repaired or an incinerator taken out of service.

7.4.6 Emission Limitations

In addition to Condition 5.2.2, the source-wide limitations in Condition 5.5, and emission limitations of Condition 7.4.3, the affected plant incinerator is subject to the following:

- a. Emissions of particulate matter from the incinerator shall not exceed 0.44 lb/hr and 0.57 ton/yr. This limit is based on the results of a stack test performed on June 22, 1993 and information provide in the permit application. Compliance with annual limits shall be determined from a running total of twelve months of data [T1].
- b. This permit is issued based on negligible emissions of carbon monoxide from the incinerator. For this purpose, emissions shall not exceed 0.1 lb/hr and 0.44 tons/year [T1].
- c. The incineration of spent solvents and or hazardous materials is not allowed [T1].

- d. The incinerator is allowed to burn only the following waste that is generated at the plant site at a rate not to exceed 119 lbs/hr:

Waste type	Type of waste %	Waste lbs/hr	Waste lbs/day
Dry wood	40	47.6	476
Paper	30	35.7	357
Rubber & Plastics	11	13.1	131
Paint filters	19	22.6	226
Total		119	1190

These limits are based on the information provided in the permit application [T1].

- e. Pursuant to the maximum hours of operation as indicated in the application, the incinerator shall not operate for more than 10 hours per day, 217 hours per month and 2,600 hours per year [T1].
- f. The afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400 degrees F, before any waste is loaded into the incinerator, and this temperature shall be maintained during incineration [T1].
- g. The incinerator afterburner shall be equipped with a continuous temperature indicator and temperature recording device (i.e., strip charge record or disk storage), so that the temperature of the afterburner combustion chamber may be monitored. The Permittee shall retain all records of equipment operation and strip charts or disk storage to at least one year from the date of occurrence. These records shall be made available for inspection by the Illinois EPA [T1].
- h. The incinerator is allowed to burn only non-solvent contaminated waste paint filters that have been generated on-site. The feed rate of the waste paint filters to the incinerator shall not exceed 4,514 pounds per month [T1].
- i. No off site generated waste of any type may be accepted for treatment without a permit from the Division of Land Pollution Control and approval the Illinois EPA [T1].

- j. The Illinois EPA requires that the waste paint filters be tested annually in order to verify that they are non-hazardous. These tests must be conducted according to TCLP analysis method provided in 35 Ill. Adm. Code 722.111 [T1].
- k. The Permittee shall maintain appropriate records to allow the Illinois EPA to review compliance. These records shall be maintained for a period of two years and shall be made available for Illinois EPA inspection upon request [T1].

The above limitations were established in permit 92080083, pursuant to Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to the rule [T1].

7.4.7 Testing Requirements

N/A

7.4.8 Monitoring Requirements

The incinerator shall be equipped with a secondary combustion chamber temperature indicator to allow verification of compliance with requirements of Condition 7.4.5(b).

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain the following records for the incinerator to demonstrate compliance with Conditions 5.5.1 and 7.4.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Secondary combustion chamber temperature prior and during the time of operation;
- b. Type and amount of waste charged (lb/hr and tons/yr);
- c. Operating logs for the incinerator, which include time of operation, operating temperature of secondary chamber;

- d. Inspection maintenance logs for the incinerator, with dates of inspection, maintenance, repair, or other actions completed; and
- e. Emissions of PM, NO_x, VOM and CO (tons/year) as calculated by Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected incinerator 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. Within 30 days for each occurrence when the incinerator was not operated in compliance with requirements of Condition 7.4.5, with date, description and explanation;
- b. Within 90 days for each occurrence when the monitoring system required by Condition 7.4.8 was not in service prior to initially charging waste to an incinerator; and
- c. Emissions of PM and CO from the affected incinerator in excess of the limits specified in Condition 7.4.3(b) and 7.4.3(c), respectively, within 30 days of such an occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3 by an incinerator is assumed to be achieved by compliance with operating requirements and work-practices specified by Conditions 7.4.5 and 7.4.6.
- b. To determine compliance with Condition 5.5.1, emissions from the incinerator shall be calculated based on the following emission factors and formulas listed below:

FINAL DRAFT/PROPOSED CAAPP PERMIT
The Interlake Companies Inc.
I.D. No.: 105060AAD
Application No.: 95120057
September 3, 2002

<u>Pollutant</u>	<u>Emission Factor (lb/ton of Charged Waste)</u>
PM	7.00
NO _x	3.00
SO ₂	2.50
CO	10.00

These are the emission factors for multiple chamber industrial waste incinerators, Tables 2.1-12, AP-42, Volume I, October 1996.

Emissions (lb) = Waste Charged Multiplied by the
Appropriate Emission Factor

7.5 Unit 05: Make-up Air Units

7.5.1 Description

Make-up air units fired with natural gas heats fresh air and add to the plant air.

7.5.2 List of emission equipment and pollution control equipment

Plant Emission Unit	Equipment Description	Date Constructed	Maximum Heat Input, each MBtu/hr
AMU-10	Make-up air unit	1988	6.94
AMU-11	Make-up air unit	1988	2.77
AMU-6, 7, 8, 9	Make-up air units	1969	Each 6.00
AMU-1, 2, 3, 4, 5	Make-up air units	1966	Each 5.98

7.5.3 Applicable Regulations

- a. The "affected Make-up air unit" for the purpose of these unit-specific conditions, is each piece of equipment as listed in condition 7.5.2.
- b. Each affected Make-up air unit is subject to the emission limits identified in Condition 5.2.2.

7.5.4 Non-Applicability of Regulations of Concern

- a. Pursuant to 35 IAC 215.303, an affected Make-up air unit is not subject to 35 IAC 215.301, Use of Organic Material.

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the affected Make-up air units are subject to the following:

Emission limits for PM, NO_x, SO₂ and CO are not set for an affected make-up air unit, as potential to emit in the absence of permit limit is less than the significant and major source thresholds for these pollutants pursuant to

Title I of the CAA, specifically 40 CFR52.41, Prevention of Significant Deterioration (PSD).

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items which allow to demonstrate compliance with Condition 5.5.1 and 7.5.5 pursuant to Section 39.5 (7) (b) of the Act:

- a. Total natural gas usage for the affected Make-up air units (Mcf/year)
- b. Annual aggregate NO_x, PM, SO₂, and CO emissions from the Make-up air units, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.5.10 Reporting Requirements

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

If there is a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report within 30 days after the deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the deviation and efforts to reduce emissions and future occurrences.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance with Condition 7.5.3 (b) is assumed to be achieved by work-practices inherent in operation of natural gas - fired Make-up air unit, so that no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with the emission limits in condition 5.5 from the affected Make-up air unit shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
NO _x	100.00
PM	7.60
SO ₂	0.60
VOM	5.50

These are the emission factors for uncontrolled natural gas combustion in boilers (<100 MBtu/hr), Tables 1.4.1 and 1.4.2, AP-42, Volume I, Supplement D, March 1998.

Make-up air units emissions (ton) = gas consumed multiplied by the appropriate emission factor ÷ 2000.

7.6 Unit 06 - Burn-off Oven

7.6.1 Description

The conveyor part hooks and any rejected parts are processed in the automated burn-off oven which drives off the VOM in the paint and ashes the pigments. The VOM which is driven off is destroyed in the afterburner which is an integral part of this burn-off oven. The cleaned part hooks are returned to the process line for reuse.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date Constructed
	Burn-Off Oven	Afterburner	1973

7.6.3 Applicable Regulations

- a. An affected burn-off oven at the source is subject to 35 IAC 212.321(a), which requires that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see Attachment 1) [35 IAC 212.321(a)].

7.6.4 Non-Applicability of Regulations of Concern

None

7.6.5 Operational and Production Limits and Work Practices

- a. Material insulated with polyvinyl chloride or asbestos, or scrap containing the fuming metals tin, zinc, or lead shall not be charged to the burn-off oven.
- b. The afterburner for the burn-off oven shall be heated to an operating temperature of at least 1400 F before charging and this temperature shall be maintained during operation.

- c. Natural gas shall be the only fuel fired in the burn-off oven.

7.6.6 Emission Limitations

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

None

Note: Emission limits for PM, NO_x, SO₂ and CO are not set for an affected burn-off oven, as potential to emit in the absence of permit limit is less than the significant and major source thresholds for these pollutants pursuant to Title I of the CAA, specifically 40 CFR52.41, Prevention of Significant Deterioration (PSD).

7.6.7 Testing Requirements

None

7.6.8 Monitoring Requirements

The burn-off oven shall be equipped with an afterburner temperature indicator.

7.6.9 Recordkeeping Requirements

- a. The Permittee shall maintain records of the following items for the burn-off oven to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- i. Record of operating temperature of the afterburner in F.
- ii. Record of maximum process weight rate (lb/hr).
- iii. Record of fuel usage (10⁶ ft³/mo).
- iv. Record of operating hours (hr/mo).

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected burn-off oven 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:

If there is a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report within 30 days after the deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the deviation and efforts to reduce emissions and future occurrences.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

- a. Recordkeeping requirements and monitoring requirements of this section shall be used to determine compliance with the operational limits in Condition 7.6.5(b).
- b. Compliance with the emission limits in Conditions 5.5.1 and 7.6.6 shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

Pollutant	Emission Factor (lb/10 ⁶ ft ³)
NO _x	100
PM	7.6
SO ₂	0.6
VOM	5.5

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

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

7.7 Unit 07: Welding Operation

7.7.1 Description

Interlake performs welding at various points in the production area. Metal structural components are joined by weld. Emissions from the welding operations are controlled by fume collection system.

The fume system is a multiport spot exhaust system designed for vacuum capture of smoke from welding at various points in the production area. The pollutants are ducted through header to a cyclone. The air exiting the cyclone is then ducted to a vacuum-inducing turbine for exhaust to the atmosphere through a silencer.

7.7.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control	Date of Construction
WFS	Automatic and manual welding operation	Fume System	1988

7.7.3 Applicability Provisions and Applicable Regulations

- a. An "affected welding operation" for the purpose of these unit specific conditions is each piece of equipment as listed in condition 7.7.2.
- b. Each affected welding operation at the source is subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 1) [35 IAC 212.321(a)].

7.7.4 Non-Applicability of Regulations of Concern

None

7.7.5 Operational and Production Limits and Work Practices

None

7.7.6 Emission Limitations

None

Note: Emission limits for PM, NO_x, SO₂ and CO are not set for an affected welding operation, as potential to emit in the absence of permit limit is less than the significant and major source thresholds for these pollutants pursuant to Title I of the CAA, specifically 40 CFR52.41, Prevention of Significant Deterioration (PSD).

7.7.7 Testing Requirements

None

7.7.8 Monitoring Requirements

None

7.7.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for affected welding stations in order to demonstrate compliance with Conditions 5.5.1 and 7.7.2(b) of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Welding wire usage lb/mo and lb/yr.
- b. Hours of operation hr/mo and hr/yr.
- c. The monthly and annual PM emissions from the affected welding operation based on the recordkeeping requirements and compliance procedures in Condition 7.7.12, with supporting calculations.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected welding operation of 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:

If there is a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report within 30 days after the deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the deviation and efforts to reduce emissions and future occurrences.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.7.12 Compliance Procedures

To determine compliance with Condition 7.7.3 and 5.5.1, emissions from the affected welding operation shall be calculated based on the following:

PM Emissions = Emission Factor* 5.2×10^{-4} lb/lb
electrode x Welding wire usage (Electrode consumed,
lb)

*The PM emission factor is from the application.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ **{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes 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

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ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section (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 (AE - 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 Emissions of Particulate Matter from New Process Emission Units

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

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

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

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

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rate greater than or equal to 408 Mg/hr (450 ton/hr):

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

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c. Limits for Process Emission Units For Which
Construction or Modification Commenced On or After
April 19, 1972 [35 IAC 212.321(c)]:

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

10.2 Attachment 2 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 Guidance on Revising This Permit

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

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

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

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

2. Minor Permit Modification

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

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

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

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

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

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

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

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

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

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



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

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

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

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

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

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

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

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

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

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

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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

10.5 Attachment 5 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.
3. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
4. Information addressing any outstanding transfer agreement pursuant to the ERMS.
5.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
 - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

FINAL DRAFT/PROPOSED CAAPP PERMIT
The Interlake Companies Inc.
I.D. No.: 105060AAD
Application No.: 95120057
September 3, 2002

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

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

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

MJP:psj

I. INTRODUCTION

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

The Interlake is located in Livingston County at Jct. Routes 66 and 23 in Pontiac. The source design, manufactures, distributes and sells storage racks, shelving, conveyors and related equipment for use in warehouses, distribution centers, retail display and storage applications.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Plant Emission Unit	Description	Emission Control Equipment
01	Ed-1	1-Boiler (E.D. Paint line First stage washer)	
	RB-1a, 1b	2-Boilers (Ransburg Paint line First stage washers)	
	RB-2	1-Boiler (Ransburg Paint line Third stage washer)	
02	Ed-2	E.D. Paint line Dry off oven	
	RB-3	Ransburg Paint Line Dry off oven	
03	ED-3a, 3b, 4a, 4b	2 Electrostatic hand spray booths and Paint bake Oven (6.6 mmBtu/hr)	Filters
	ED-5	Electrostatic dip tank and above bake Oven	Filters
	RB-4, 5, 6, 7	Ransburg paint line disc loop 1,2,3,4 and Paint bake Oven RB-10 (7.7 mmBtu/hr)	Filters
	RB-8a, 8b, 9a, 9b	Ransburg paint line hand spray touch-up booth #1 & #2 and above bake Oven	Filters
		Touch up booth	Filters
04	AN	Cleaver-Brooks CBV-255	Afterburner
05	AMU-1 to AMU-10	Make-up air units	
06		Burn-Off Oven	Afterburner
07		Automatic and manual welding operation -Fume System	Cyclone

III. EMISSIONS

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

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	241.7
Sulfur Dioxide (SO ₂)	0.3
Particulate Matter (PM)	11.4
Nitrogen Oxides (NO _x)	42.6
HAP, not included in VOM or PM	---
TOTAL	296.0

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

IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also

contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

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

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.