

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Hendrickson Bumper & Trim  
Attn: John Payne, Operations Manager  
501 Caton Farm Road  
Crest Hill, Illinois 60434

<u>Application No.:</u> 86010080	<u>I.D. No.:</u> 197025AAF
<u>Applicant's Designation:</u>	<u>Date Received:</u> January 9, 2012
<u>Subject:</u> Automotive Parts Manufacturing Plant	
<u>Date Issued:</u> February 28, 2012	<u>Expiration Date:</u> March 20, 2013
<u>Location:</u> 501 Caton Farm Road, Crest Hill, Will County	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of five (5) stamping presses, manual clean-up operations, four (4) cold cleaning degreasers, and a spray paint booth with dry paint booth filters and a 9.0 mmBtu/hr natural gas-fired cure/bake oven pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds, (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
  - ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to initial issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.

- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
- d. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- e. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- e. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;

- v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and
  - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- f. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- g. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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 which, 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 35 Ill. Adm. Code 212.321(c).
3. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 4a. Pursuant to 35 Ill. Adm. Code 218.181, the requirements of 35 Ill. Adm. Code 218.182, 218.183, 218.184, and 218.186 shall apply to all cold cleaning, open top vapor degreasing, and conveyORIZED degreasing operations which use volatile organic materials.
- b. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations which use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;

c. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b)(1), (b)(2), or (b)(3). No owner or operator of a source that manufactures coatings, inks, adhesives, or resins shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in at least one of the following subsections: 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5).

i. The VOM content of the as-used cleaning solutions does not exceed the following emissions limitations:

	<u>kg/l</u>	<u>lb/gal</u>
All other cleaning operations not subject to a specific limitation in 35 Ill. Adm. Code 218.187(b)(1)(a) through (b)(1)(D)	0.050	0.42

ii. The VOM composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);

d. Pursuant to 35 Ill. Adm. Code 218.204(j), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Miscellaneous Metal Parts and Products Coating. Except as otherwise provided in 35 Ill. Adm. Code 218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows:

	kg/l	lb/gal
Prior to May 1, 2012: Miscellaneous Metal Parts and Products Coating		
All other coatings		
i. Air Dried	0.40	(3.3)
ii. Baked	0.34	(2.8)

- e. Pursuant to 35 Ill. Adm. Code 218.204(q)(1), on and after May 1, 2012, the owner or operator of a miscellaneous metal or plastic parts coating line shall comply with the limitations in 35 Ill. Adm. Code 218.204(q). The limitations in 35 Ill. Adm. Code 218.204(q) shall not apply to aerosol coating products, powder coatings, or primer sealants and ejection cartridge sealants used in ammunition manufacturing. Primer sealants and ejection cartridge sealants shall instead be regulated under 35 Ill. Adm. Code 218 Subpart TT. For purposes of 35 Ill. Adm. Code 218.204(q)(1), "corrosion resistant basecoat" means a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance. The limitations in 35 Ill. Adm. Code 218.204(q)(1) shall not apply to stencil coats, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating. The limitations in 35 Ill. Adm. Code 218.219, however, shall apply to these coatings unless specifically excluded in 35 Ill. Adm. Code 218.219.

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
i.	General one component coating		
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Baked	0.28 (2.3)	0.40 (3.35)
ii.	General multi-component coating		
	A. Air dried	0.34 (2.8)	0.54 (4.52)
	B. Baked	0.28 (2.3)	0.40 (3.35)
iii.	Repair coats and touch-up coatings		
	A. Air dried	0.42 (3.5)	
	B. Baked	0.36 (3.01)	

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
iv.	All other coatings		
	A. Air dried	0.40 (3.3)	0.73 (5.98)
	B. Baked	0.34 (2.8)	0.54 (4.52)
f.	Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall apply only to photochemically reactive material.		
5a.	This permit is issued based on the four (4) cold cleaning degreasers not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR 63 Subpart T because the three (3) conveyORIZED cold degreasers does not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.		
b.	This permit is issued based on the spray paint booth not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm because the source is not a major source of HAP emissions. This is a result of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs.		
c.	This permit is issued based on the spray paint booth not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH, because the source is not involved in the spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.		

6. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
- 7a. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(A), notwithstanding 35 Ill. Adm. Code 218.187(a)(1), the following cleaning operations shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g);
  - i. Cleaning operations subject to the limitations in 35 Ill. Adm. Code 218.182, 218.183, or 218.184;
  - ii. Janitorial cleaning;
  - iii. Stripping of cured coatings, inks, or adhesives;
- b. Pursuant to 35 Ill. Adm. Code 218.187(a)(2)(B)(x), notwithstanding 35 Ill. Adm. Code 218.187(a)(1) cleaning operations within the miscellaneous metal parts coating source category shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (f), and (g).
- c. Pursuant to 35 Ill. Adm. Code 218.208(d), prior to May 1, 2012, the limitations of 35 Ill. Adm. Code 218 Subpart F shall not apply to touch-up and repair coatings used by a coating source described by 35 Ill. Adm. Code 218.204(j), (n), and (o), provided that the source-wide volume of the coatings used does not exceed 0.95 l (1 quart) per eight-hour period or exceed 209 l/yr (55 gal/yr) for any rolling 12 month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with 35 Ill. Adm. Code 218.208(e).
- d. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- 8a. Pursuant to 35 Ill. Adm. Code 218.182(a), no person shall operate a cold cleaning degreaser unless:
  - i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;

- ii. The cover of the degreaser is closed when parts are not being handled; and
  - iii. Parts are drained until dripping ceases.
- b. Pursuant to 35 Ill. Adm. Code 218.182(b), no person shall operate a cold cleaning degreaser unless:
- i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powered system if:
    - A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);
    - B. The solvent is agitated; or
    - C. The solvent is heated above ambient room temperature.
  - ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
    - A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
    - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
  - iii. The degreaser is equipped with one of the following control devices if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point:
    - A. A freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less; or
    - B. Any other equipment or system of equivalent emission control as approved by the Illinois EPA and further processed consistent with 35 Ill. Adm. Code 218.108. Such a system may include a water cover, refrigerated chiller or carbon adsorber.
  - iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
  - v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.

- c. Pursuant to 35 Ill. Adm. Code 218.182(c)(3)(B), on and after May 30, 2007 no person shall operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F) , unless the person is in compliance with the control requirements of 35 Ill. Adm. Code 218.182(c)(4) or is exempt under 35 Ill. Adm. Code 218.182(f) or (g).
- d. Pursuant to 35 Ill. Adm. Code 218.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 218.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.187(e).
- e. Pursuant to 35 Ill. Adm. Code 218.187(d), the owner or operator of a source subject to the requirements of 35 Ill. Adm. Code 218.187 shall comply with the following for each subject cleaning operation. Such requirements are in addition to work practices set forth in 35 Ill. Adm. Code 218.187(b)(4) and (b)(5), as applicable:
  - i. Cover open containers and properly cover and store applicators used to apply cleaning solvents;
  - ii. Minimize air circulation around the cleaning operation;
  - iii. Dispose of all used cleaning solutions, cleaning towels, and applicators used to apply cleaning solvents in closed containers;
  - iv. Utilize equipment practices that minimize emissions.
- f. Pursuant to 35 Ill. Adm. Code 218.219(b), except as provided in 35 Ill. Adm. Code 218.219(c), every owner or operator of a coating line described in 35 Ill. Adm. Code 218.204(q) shall:
  - i. Store all VOM-containing coatings, thinners, coating-related waste materials, cleaning materials, and used shop towels in closed containers;
  - ii. Ensure that mixing and storage containers used for VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing these materials;
  - iii. Minimize spills of VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials;
  - iv. Convey VOM-containing coatings, thinners, coating-related waste materials, and cleaning materials from one location to another in closed containers or pipes;
  - v. Minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment

cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers; and

- vi. Apply all coatings using one or more of the following application methods:
  - A. Electrostatic spray;
  - B. High volume low pressure (HVLP) spray;
  - C. Flow coating. For the purposes of 35 Ill. Adm. Code 218.219(b)(6)(C), flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
  - D. Roll coating;
  - E. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 218.219(b)(6)(E), electrodeposition means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
  - F. Airless spray;
  - G. Air-assisted airless spray; or
  - H. Another coating application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.
- 8a. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the dry paint booth filters such that the dry paint booth filters are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- c. The natural gas fired cure/bake oven shall only be operated with natural gas as the fuel. The use of any other fuel in the oven requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.

- 9a. Solvent usage and VOM emissions from manual clean-up operations and four cold cleaning degreasers shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Gals/Mo)</u>	<u>(Gals/Yr)</u>	<u>(lbs/Gal)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Clean-Up Alcohol	250	3,000	6.61	0.83	9.92
Degreasing Solvent	80	700	6.54	0.26	<u>2.29</u>
				Total:	12.21

These limits are based on the maximum material usage and the maximum VOM content. VOM emissions from clean-up and degreasing operations shall be calculated using the following formula:

$$E = (S_p \times C_p - S_s \times C_s) / 2,000$$

Where:

E = VOM emissions (tons);

S<sub>p</sub> = Amount of solvent purchased (gallons);

C<sub>p</sub> = VOM content of purchased solvent (lbs/gallon);

S<sub>s</sub> = Certified amount of solvent shipped-off for recycling or disposal (gallons/month, gallons/year); and

C<sub>s</sub> = Certified VOM content of solvent shipped-off (lbs/gallon).

- b. Lubricating oil usage and VOM emissions from five stamping presses shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u>	<u>VOM Emissions</u>	
	<u>(Gals/Mo)</u>	<u>(Gals/Yr)</u>	<u>(lbs/Gal)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Lubricating Spray	40	440	4.0	0.1	0.9

These limits define the potential emissions of the VOM and are based on the actual emissions determined from the maximum production capacity and maximum VOM content of the raw materials.

- c. Operation and VOM emissions from paint spray booth shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Coatings	0.50	5.00	0.50	5.00
Paint Gun Cleaner	0.10	0.10	0.10	<u>1.00</u>
			Total:	6.00

These limits are based on maximum coating usage and a maximum coating VOM content of 2.8 lbs/gallon.

- d. VOM and HAP emissions from the spray paint booth shall be calculated using the following equation:

$$E = [\sum P_i \times d_i \times C_i] / 2,000$$

where:

E = VOM or HAP emissions (tons);

P<sub>i</sub> - coating and solvent usage (gallons);

d<sub>i</sub> = density of coating and solvent used (lbs/gallon); and

C<sub>i</sub> = VOM or HAP content of raw material P<sub>i</sub> used (% by weight).

- e. This permit is issued based on negligible emissions of particulate matter (PM) from the paint spray booth. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- f. Operation and emission of the natural gas fired cure/bake oven shall not exceed the following limits:
  - i. Natural Gas Usage: 15 mmscf/month and 120 mmscf/year
  - ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	Emission	
	<u>Factor</u> <u>(lbs/mmscf)</u>	<u>Emissions</u> <u>(Tons/Mo)</u> <u>(Tons/Yr)</u>
Carbon Monoxide (CO)	84	0.63    5.04
Nitrogen Oxides (NO <sub>x</sub> )	100	0.75    6.00
Particulate Matter (PM)	7.6	0.06    0.46
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01    0.04
Volatile Organic Material (VOM)	5.5	0.04    0.33

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

- g. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- h. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 10a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing



compliance with the VOM content limitations in 35 Ill. Adm. Code 218.187(b)(1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:

- i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used; provided, however, Method 24, incorporated by reference in 35 Ill. Adm. Code 218.112, shall be used to demonstrate compliance; or
    - ii. The manufacturer's specifications for VOM content for cleaning solvents may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern;
  - c. Pursuant to 35 Ill. Adm. Code 218.187(g)(3), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
  - d. Pursuant to 35 Ill. Adm. Code 218.211(a), the VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105 to establish the records required under 35 Ill. Adm. Code 218.211.
13. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If

relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

14. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 15a. Pursuant to 35 Ill. Adm. Code 218.182(d)(2), all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c)(1)(B), (c)(2)(B), and (c)(3)(B) must maintain records which include for each purchase:
  - i. The name and address of the solvent supplier;
  - ii. The date of purchase;
  - iii. The type of solvent;
  - iv. The vapor pressure of the solvent measured in mmHg at 20°C (68°F); and
  - v. For any mixture of solvents, the vapor pressure of the mixture, as used, measured in mmHg at 20°C (68°F).
- b. Pursuant to 35 Ill. Adm. Code 218.182(e), all records required by 35 Ill. Adm. Code 218.182(d) shall be retained for three years and shall be made available to the Illinois EPA upon request.
- c. Pursuant to 35 Ill. Adm. Code 218.187(e)(3), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(1) shall collect and record the following information for each cleaning solution used:
  - i. For each cleaning solution that is prepared at the source with automatic equipment:
    - A. The name and identification of each cleaning solution;
    - B. The VOM content of each cleaning solvent in the cleaning solution;
    - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);

- D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
  - E. The VOM content of the as-used cleaning solution, with supporting calculations; and
  - F. A calibration log for the automatic equipment, detailing periodic checks;
- ii. For each batch of cleaning solution that is not prepared at the source with automatic equipment:
    - A. The name and identification of each cleaning solution;
    - B. Date, time of preparation, and each subsequent modification of the batch;
    - C. The VOM content of each cleaning solvent in the cleaning solution;
    - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
    - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a);
- d. Pursuant to 35 Ill. Adm. Code 218.187(e)(4), all sources complying with this Section pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(2) shall collect and record the following information for each cleaning solution used:
    - i. The name and identification of each cleaning solution;
    - ii. Date, time of preparation, and each subsequent modification of the batch;
    - iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
    - iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
    - v. The VOM composite partial vapor pressure of each as-used cleaning

solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;

- e. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
  - f. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:
    - i. The name and identification number of each coating as applied on each coating line;
    - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;
    - iii. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line, and certified product data sheets for each coating.
  - g. Pursuant to 35 Ill. Adm. Code 218.211(h)(3), on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.219 shall comply with the following: Maintain at the source all records required by 35 Ill. Adm. Code 218.211(h) for a minimum of three years from the date the document was created and make those records available to the Illinois EPA upon request.
- 16a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Records addressing use of good operating practices for the dry paint booth filters:
    - A. Records for periodic inspection of the dry paint booth filters with date, individual performing the inspection, and nature of inspection; and
    - B. Records for prompt repair of defects, with identification

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

- ii. The name and identification number of solvents used;
  - iii. The usage (gallons/month), density (lbs/gallon), VOM and HAP content (weight percent or lbs/gallon) of each cleaning solvent;
  - iv. The name and identification number of lubricating sprays used;
  - v. The usage (gallons/month), density (lbs/gallon), VOM and HAP content (weight percent or lbs/gallon) of each lubricating spray;
  - vi. Coating usage (gallons/month and gallons/year);
  - vii. Solvent usage (gallons/month and gallons/year);
  - viii. VOM and HAP contents of materials used (percent by weight);
  - ix. The densities of materials used (lbs/gallon);
  - x. Natural gas usage (mmscf/month and mmscf/year); and
  - xi. Monthly and annual emissions of CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, VOM and HAPs from the source, with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
17. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 18a. Pursuant to 35 Ill. Adm. Code 218.182(d)(5), all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c) shall notify the Illinois EPA at least 30 days before changing the method of compliance between 35 Ill. Adm. Code 218.182(c)(3) and (c)(4). Such notification shall include a demonstration of compliance with the newly applicable subsection.
- b. Pursuant to 35 Ill. Adm. Code 218.182(d)(6), all persons subject to the

requirements of 35 Ill. Adm. Code 218.182(b) or (c) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.182(b) or (c) by sending a description of the violation and copies of records documenting such violations to the Illinois EPA within 30 days following the occurrence of the violation.

- c. Pursuant to 35 Ill. Adm. Code 218.187(e)(2)(B), all sources subject to the requirements of 35 Ill. Adm. Code 218.187 shall: At least 30 calendar days before changing the method of compliance between 35 Ill. Adm. Code 218.187(b)(1) or (b)(2), (b)(4), or (b)(5) and 35 Ill. Adm. Code 218.187(b)(3), notify the Illinois EPA in writing of such change. The notification shall include a demonstration of compliance with the newly applicable subsection;
- d. Pursuant to 35 Ill. Adm. Code 218.187(e)(9), all sources subject to the requirements of 35 Ill. Adm. Code 218.187(b) and (d) shall notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.187(b) or (d) by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation;
- e. Pursuant to 35 Ill. Adm. Code 218.211(c), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following:
  - i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from 35 Ill. Adm. Code 218.205, 35 Ill. Adm. Code 218.207, 35 Ill. Adm. Code 218.215, or 35 Ill. Adm. Code 218.216 to 35 Ill. Adm. Code 218.204; the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 218.204 on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date. The certification shall include:
    - A. The name and identification number of each coating as applied on each coating line;
    - B. The weight of VOM per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;
    - C. For coating lines subject to the limitations of 35 Ill. Adm. Code 218.204(q), the weight of VOM per volume of each coating, or the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line.

- ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:
  - A. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
  - B. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d)(1) or (e)(1), as applicable. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.211(d), (e), or (i), as applicable.
- f. Pursuant to 35 Ill. Adm. Code 218.211(h), on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, whichever is later, the owner or operator of a coating line subject to the requirements of 35 Ill. Adm. Code 218.219 shall comply with the following:
  - i. By May 1, 2012, or upon initial start-up, whichever is later, submit a certification to the Illinois EPA that includes:
    - A. A description of the practices and procedures that the source will follow to ensure compliance with the applicable requirements in 35 Ill. Adm. Code 218.219;
    - B. For sources subject to 35 Ill. Adm. Code 218.219(a)(6), the work practices plan specified in 35 Ill. Adm. Code 218.219;
    - C. For sources subject to 35 Ill. Adm. Code 218.219(b)(6), the application methods used to apply coatings on the subject coating line;
  - ii. Notify the Illinois EPA of any violation of 35 Ill. Adm. Code 218.219 by providing a description of the violation and copies of records documenting the violation to the Illinois EPA within 30 days following the occurrence of the violation;
- 19a. If there is an exceedance of or 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 exceedance or 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 exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

It should be noted that this permit has been revised so as to include operation of the equipment described in Construction permit 11090015.

It should also be noted that this permit has been revised so as to reduce the permitted emissions from the clean-up alcohol usage from 21.5 tons/year to 9.92 tons/year.

If you have any questions on this permit, please call David Hulskotter at 217/785-1705.

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:DWH:jws

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Automotive Part Manufacturing Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario, which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)						
	<u>CO</u>	<u>NO<sub>x</sub></u>	<u>PM</u>	<u>SO<sub>2</sub></u>	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAPs</u>
Clean-Up Operations					9.92		
4 Cold Cleaning							
Degreasers					2.29		
5 Stamping Presses					0.90		
Paint Spray Booth			0.44		6.00		
Cure/Bake Oven	5.04	6.00	0.46	0.04	0.33	--	--
Total	5.04	6.00	0.90	0.04	19.44	9.0	22.5