

217/782-2113

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

PERMITTEE

Owens Corning
Attn: Tom Szydelko
5824 South Archer Road
Summit, Illinois 60501

Application No.: 96030077 I.D. No.: 031006AAC
Source Location: 5824 South Archer Road, Summit, Cook County
Operation of: Asphalt and Roofing Products
Date Received: March 7, 1996
Date Issued: April 25, 2000 Expiration Date²: April 24, 2005
Responsible Official: Ray Wierzbowski, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE an Asphalt and Roofing Products Manufacturing Plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: October 24, 2001
Revision Date Issued: November 15, 2001
Purpose of Revision: Administrative Amendment

This administrative amendment reflects the change of the source's responsible official. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous version of the permit is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

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

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

DES:AB:psj

cc: Illinois EPA, FOS, Region 1
USEPA

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

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Owens Corning
5824 South Archer Road
Summit, Illinois 60501
708/594-6900

I.D. No.: 031006AAC

Standard Industrial Classification: 2952, Asphalt Felts and
Coatings

1.2 Owner/Parent Company

Owens Corning
One Owens Corning Parkway
Toledo, Ohio 43659

1.3 Operator

Owens Corning
5824 South Archer Road
Summit, Illinois 60501

Contact Person's Name:

Tom Szydelko
708/594-6900

1.4 General Source Description of Source

Owens Corning is located at 5824 South Archer Road in Summit and
manufacturers roofing materials and roofing coatings.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
°C	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
cfm	cubic foot per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft	feet
ft ³	cubic foot
g	grams
gal	gallons
gr	grains
HAP	Hazardous Air Pollutant
Hp	Horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kg	kilogram
l	liter
LAER	Lowest Achievable Emission Rate
lb	pound
LEL	Lower Explosive Limit
m	meter
MACT	Maximum Achievable Control Technology
mmBtu/hr	Million British thermal units per hour
mg	milligrams
mmHg	millimeters of mercury
mmscf	million standard cubic feet
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NO _x	Nitrogen Oxides
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
psia	pounds per square inch absolute
RMP	Risk Management Plan
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Tons
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TOC	Total Organic Compounds
TSP	Total Suspended Particles
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
wt.	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

None

- 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:

Kerosene Tanks
Recycle Cutback Melter

- 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:

- a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].
- b. Equipment used for the melting or application of less than 50,000 lb/yr of wax to which no organic solvent has been added [35 IAC 201.210(a)(7)].
- c. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and annual throughput of less than 100,000 gallons provided the tank is not used for the storage of gasoline or any listed hazardous air pollutant pursuant to Section 112(b) of the Clean Air Act [35 IAC 201.210(a)(10)].
- d. Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].
- e. Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from

all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

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

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment Designation	Description	Emission Control Equipment
Group 1	Fuel Combustion Emission Units (EU-1)	Tank 9 Burner, Tank 15 Burner #1, Tank 15 Burner #2, Tank 18 Burner, Tanks 60-64 Burners, Boiler #1, Boiler #2, Filler Hot Oil Heater	None
Group 2	Asphalt Storage Tanks (EU-2)	<p><u>i.</u> Tanks #19, #20, #40, #41, #42, and #43</p> <p><u>ii.</u> Tanks #9, #9A, #10A, #11, #17, and #18</p> <p><u>iii.</u> Tanks #27, #28, and #31-#36</p> <p><u>iv.</u> Tank #98</p> <p><u>v.</u> Tanks #10, #15, #16, #60-64, #74-#77, and #79</p> <p><u>vi.</u> Tanks #70 and #71 for Cutback Asphalt</p> <p><u>vii.</u> Tanks #102, #104, and #107 for Cutback Asphalt</p> <p><u>viii.</u> Tanks #105, #106, #67-#72, and #78 (Cutback Asphalt)</p>	<p>Regenerative Thermal Oxidizer #1</p> <p>Regenerative Thermal Oxidizer #2</p> <p>Regenerative Thermal Oxidizer #3</p> <p>Regenerative Thermal Oxidizer #4</p> <p>None</p> <p>Condenser #1</p> <p>Condenser #2</p> <p>None</p>
Group 3	Solvent Storage Tanks (EU-2)	Storage Tanks #65, #66, and #78	Submerged Loading Pipe
Group 4	Convertors (EU-7/8)	Convertors #1 and #2 Convertors #6-#9	Preheater #1 Afterburner #3
Group 5	Loading Racks (EU-9/10)	Loading Racks: #1-#2, #4, #5, #9 and PV1	Regenerative Thermal Oxidizers #1-4

Emission Unit	Equipment Designation	Description	Emission Control Equipment
Group 6	Coating Operations (EU-13/14/16)	Coater/Coating Surge Tank; Asphalt Filler Mixer; Adhesive Melt Tank; Adhesive Use Tank; and Cooling Section	None Dust Collector Fiber Filter None None
Group 7	Material Handling and Unloading Operations	Lower Surge Hopper; Filler Silo and Unloading; Upper Surge Hopper; Backup Upper Surge Hopper; Parting Agent Silo and Unloading; Filler Heater; Surfacing Material Silos and Unloading; Surfacing Material Surge Bin; Surfacing Material Bins; Material Surfacing Area; and Parting Agent Use Bin	Dust Collector Dust Collector Dust Collector Dust Collector None Dust Collectors Dust Collector Dust Collector None Dust Collector
Group 8	Mineral Rubber (MR) Process (EU-18)	Drying/Grinding and Packaging of Asphalt by Application of Conveyor, Hammermill, and Bagger	Dust Collector
Group 9	Gasoline Storage Tank		

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

This permit is issued based on the source requiring a CAAPP permit as a major source of VOM, SO₂, HAPs, and PM-10 emissions.

5.2 Applicable Regulations

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

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

- a. No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. 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 35 IAC 212.124.
- c. Operations of Owens Corning and PM-10 emissions from this location are regulated by 35 IAC Part 212 Subpart Q: Stone, Clay, Glass and Concrete Manufacturing. Specifically, the following emission limits are established in 35 IAC 212.425(b) for specific emission units operated by the Permittee:

No person shall cause or allow the emission of PM-10, other than that of fugitive particulate matter, into the atmosphere to exceed the following limits during any one hour period:

- i. 57.2 mg/scm (0.025 gr/scf) for coater and cooling loop ventilator at a roofing asphalt manufacturing plant located in the Village of Summit;
- ii. 34.3 mg/scm (0.015 gr/scf) for mineral filler handling emission units at a roofing asphalt manufacturing plant located in the Village of Summit;

- iii. 0.03 kg/Mg (0.06 lb/T) of asphalt mixed for asphalt mixer at a roofing asphalt manufacturing plant located in the Village of Summit; and
 - iv. 91.6 mg/scm (0.04 gr/scf) for roofing asphalt blowing stills, except stills Nos. 1 and 2, at a roofing asphalt manufacturing plant located in the Village of Summit.
- d.
 - i. Any saturator or mineral handling and storage facility at asphalt roofing plant that commences construction or modification after November 18, 1980 is subject to the requirements of 40 CFR 60, Subpart UU **A**Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture@.
 - ii. Any asphalt storage tank or blowing still (convertor) that processes and/or stores asphalt used for roofing only or for roofing and other purposes, and that commences construction or modification after November 18, 1980 is subject to the requirements of 40 CFR 60, Subpart UU **A**Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture@.
 - iii. Any asphalt storage tank or blowing still (convertor) that processes and/or stores only nonroofing asphalts and that commences construction or modification after May 26, 1981 is subject to the requirements of 40 CFR 60, Subpart UU **A**Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture@.
 - iv. Specific limitations and requirements of 40 CFR 60, Subpart UU are established in appropriate subsections of Section 7.
 - e.
 - i. Each asphalt storage tank operated at this site and not controlled by an afterburner or other VOM reduction system is subject to 35 IAC 218.301 that requires to keep emissions of VOM below 8 lb/hr from such storage tank.
 - ii. Each asphalt storage tank operated at this site and controlled by an afterburner is subject to 35 IAC 218.302(a) that requires at least 85% reduction of VOM emissions from such storage tank.
 - f. Except as otherwise provided in 35 IAC Part 212 and conditions of this permit, no person shall cause or

allow the emission into the atmosphere of PM-10, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period [35 IAC 212.324(b)].

- 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 Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.
- 5.2.5. Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.
- 5.2.6. This stationary source, as defined in 35 IAC 212.700, is required to prepare and submit a contingency measure plan for PM-10 emission reductions as set forth in 35 IAC 212.703. Such plan is incorporated by reference into this permit and shall be implemented in accordance with 35 IAC 212.704. The source shall comply with the applicable requirements of 35 IAC Part 212 Subpart U, incorporated herein by reference. [35 IAC Part 212 Subpart U]

5.3 Non-Applicability of Regulations of Concern

- a. Each asphalt storage tank operated at this site is not subject to 35 IAC 218.120 because vessels storing

petroleum liquids are exempted from applicability of 35 IAC 218.119 pursuant to 35 IAC 218.119(e).

- b. Each asphalt storage tank operated at this site is not subject to 35 IAC 218.121 because a vapor pressure of asphalt at 70°F is less than 1.5 psia.
- c. Loading operations of asphalt performed at this site into any railroad tank car, tank truck or trailer are not subject to 35 IAC 218.122 because a vapor pressure of asphalt at 70°F is less than 2.5 psia [35 IAC 218.122(c)].
- d. Each asphalt storage tank operated at this site is not subject to 35 IAC 218.123(b) based on the following:
 - i. Asphalt stored in these storage tanks is not a volatile petroleum liquid (VPL) pursuant to definition of VPL contained in 35 IAC 211.7170 and a definition of standard conditions contained in 35 IAC 211.6270; and
 - ii. Pursuant to 35 IAC 218.123(a)(6) any storage tank which is used for non-volatile petroleum liquid is not subject to requirements of 35 IAC 218.123(b).

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 pursuant to 35 IAC 212.324(f):

For any process emission unit described in Condition 5.2.2 (c), the owner or operator shall maintain and repair air pollution control equipment in a manner that assures that applicable emission limits and standards shall be met at all times. Proper maintenance shall include the following minimum requirements:

- a. Visual inspection of air pollution control equipment;
- b. Maintenance of an adequate inventory of spare parts; and
- c. Expedient repairs, unless the emission unit is shutdown.

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)	181.7
Sulfur Dioxide (SO ₂)	217.0
Particulate Matter (PM)	167.2
Nitrogen Oxides (NO _x)	74.89
HAP, not included in VOM or PM	58.16
TOTAL	698.95

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

None

5.6 General Recordkeeping Requirements

5.6.1 Emission records

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

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. The Permittee shall maintain the following records for maintenance and repair as required by 35 IAC 212.324(g):
 - i. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment;
 - ii. The owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made;

- iii. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated;
- iv. Copies of all these records shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA; and
- v. Upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

5.6.2 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

The Permittee is granted the following operational flexibility, provided records are kept of the nature, date and emissions results and provided the facility net emissions do not exceed those established in Sections 5 and 7 of this permit:

- a. The Permittee may substitute, change or add any food grade ingredient to any of its manufacturing processes.
- b. The Permittee may add equipment or modify its operation to manufacture under a different SIC code than listed in Section 1, provided that other relevant requirements of this permit are met.
- c. The Permittee may move, modify or replace any equipment considered to be part of its process. The Permittee may move, modify or replace any pollution control device provided the emissions from the new or modified control device are the same or less than prior to such modification/replacement and still in compliance with applicable emission limits listed in Section 7.
- d. The Permittee may add dust collection systems to equipment currently classified as an insignificant activity to improve sanitation and collect materials that are normally swept up to otherwise collected.
- e. The Permittee shall apply for revision of this permit considering any internal trade of emissions between emission units and resulting increase/decrease of emission levels for certain units established in Section 7.

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 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.

5.10 Construction Permits Revisions

The conditions of construction permits referenced in Section 7 of this CAAPP have been revised to reflect the following:

Pursuant to the USEPA memorandum from October 16, 1995, emissions of PM-10 but not TSP (total suspended particles) be considered for Title V applicability. Therefore, all construction permits previously issued to Owens Corning revised to reflect the change of the regulated air pollutant from TSP to PM-10.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a cap and trade market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold allotment trading units (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permit. These allotments are established from historical VOM emissions or baseline emissions lowered to provide the emission reduction from stationary sources required for further progress.

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

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

6.2 Applicability

This source is considered a participating source for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by Condition 6.8, as of December 31 of

each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to Aemissions excursion compensation,@ as described in Condition 6.4.

- i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA, and obtain a Transaction Account prior to conducting any market transactions, pursuant to 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC

205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

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

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

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

- i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
- ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 507 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 57.4889 tons.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units.

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

None

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs from the allotment as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs from the allotment to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

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

6.11 Exclusion from Further Reduction

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reduction requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

Boilers and Cogeneration Engines

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reduction requirements specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Fuel Combustion Emission Units

7.1.1 Description

Production of heat and steam for manufacturing purposes.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Fuel Combustion Emission Units (EU1)	<u>Tank Burners</u> : Tank #9, #15 (2 Burners), #18, #60-#64	None
		<u>Boilers #1 and #2</u>	None
		<u>Filler Hot Oil Heater</u>	None
		Dates of Construction: #9, #15, #18: 1972-1984 #60-#64: 1972-1980 Boilers #1 and #2: 1977 Filler Hot Oil Heater: 1995	

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected fuel combustion emission unit" for the purpose of these unit specific conditions is a natural gas-fired burner, boiler or heater that is used for purpose of heat and steam production.
- b. The emission of carbon monoxide (CO) into the atmosphere from each affected fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.1.4 Non-Applicability of Regulations of Concern

- a. Each affected fuel combustion emission unit is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of such fuel combustion emission unit is less than 73.2 MW (250 mmBtu/hr).
- b. Pursuant to 35 IAC 218.303, any fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

7.1.5 Operational and Production Limits and Work Practices

None

7.1.6 Emission Limitations

Emissions and operation of affected fuel combustion emission units shall not exceed the following limits:

a. Filler Hot Oil Heater

NO_x Emissions
(lb/hr) (ton/yr)

0.4 1.8

The above limitations were established in Construction Permit 95060172, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. Compliance with annual limits shall be determined based on the 12 months of data.

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

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

Total natural gas usage, in terms of scf /month and scf/year.

7.1.10 Reporting Requirements

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

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Unit in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the

recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 and 7.1.6 of this permit shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

Maximum heating capacity < 100 mmBtu/hr:

<u>Pollutant</u>	<u>Natural Gas Emission Factors (lb/10⁶ ft³)</u>
PM	7.6
NO _x	100
SO ₂	0.6
VOM	5.5

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

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

7.2 Group 2: Asphalt Storage Tanks

7.2.1 Description

Both raw material and finished product asphalt are kept hot in tanks by the following methods: insulated tanks; gas burning tanks: direct fired process heater; and steam coils.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 2	Asphalt Storage Tanks (EU2)	<u>i.</u> Tanks #19, #20, #40, #41, #42, and #43	Regenerative Thermal Oxidizer #1
	Dates of Construction:	<u>ii.</u> Tanks #9, #9A, #10A, #11, #17, and #18	Regenerative Thermal Oxidizer #2
	#10A, #17, #18, #19, #20, #40, #42, #43, #104, and #107 - Before 1980	<u>iii.</u> Tanks #27, #28, and #31-#36	Regenerative Thermal Oxidizer #3
	#9, #10, #15, #16, #60-#64, #74-#77, and #79 - Before 1978	<u>iv.</u> Tank #98	Regenerative Thermal Oxidizer #4
	#102, and #69-#72 - Before 1984	<u>v.</u> Tanks #10, #15, #16, #60-#64, #74-#77, and #79	None
	#41 - 1992	<u>vi.</u> Tanks #70 and #71 (Cutback Asphalt)	Condenser #1
	#9A - 1994	<u>vii.</u> Tanks #102, #104, and #107 (Cutback Asphalt)	Condenser #2
	#98 - 1995 #11, #27, #28, and #31-36 - After 1980	<u>viii.</u> Tanks #105, #106, and #67-#72 (Cutback Asphalt)	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected storage tank" for the purpose of these unit specific conditions is a unit where a heated asphalt liquid or cutback asphalt is stored.

- b. Each storage tank operated without emission control device is subject to 35 IAC 218.301 and is not allowed to discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere.
- c.
 - i. Each affected storage tank (except all cutback asphalt tanks) constructed after November 18, 1980 is subject to 40 CFR 60 Subpart UU **A**Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture@.
 - ii. No owner or operator of each such storage tank shall discharge into the atmosphere from any asphalt storage tank exhaust gases with opacity greater than 0 percent, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing [40 CFR 60.472(c)].
- d. Each affected storage tank constructed after July 23, 1984 with a design capacity greater or equal to 151 m³ (39,890 gal) containing a volatile organic liquid that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa, is subject to requirements of 40 CFR 60 Subpart Kb **A**Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984" and shall be equipped with a closed vent system and control device meeting the following specifications pursuant to 40 CFR 60.112b(a)(3):
 - i. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in 40 CFR 60.485(b); and
 - ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater.
- e. All other storage tanks equipped with emission control devices and not regulated by 40 CFR 60 Subpart Kb are allowed to emit more than 8 lb/hour of organic material, pursuant to 35 IAC 218.302, if such emission control device demonstrates 85 reduction of uncontrolled organic material emissions.

7.2.4 Non-Applicability of Regulations of Concern

- a. Each asphalt storage tank operated at this site is not subject to 35 IAC 218.120 because vessels storing petroleum liquids are exempted from applicability of 35 IAC 218.119 pursuant to 35 IAC 218.119(e).
- b. Each asphalt storage tank operated at this site is not subject to 35 IAC 218.121 because a vapor pressure of asphalt at 70°F is less than 1.5 psia.
- c. Loading operations of asphalt performed at this site into any railroad tank car, tank truck or trailer are not subject to 35 IAC 218.122(a) because a vapor pressure of asphalt at 70°F is less than 2.5 psia [35 IAC 218.122(c)].
- d. Loading operations of asphalt performed at this site into any storage tank are not subject to 35 IAC 218.122(b) because a vapor pressure of asphalt at 70°F is less than 2.5 psia [35 IAC 218.122(c)].
- e. Each asphalt storage tank operated at this site is not subject to 35 IAC 218.123(b) based on the following:
 - i. Asphalt stored in these storage tanks is not a volatile petroleum liquid (VPL) pursuant to definition of VPL contained in 35 IAC 211.7170 and a definition of standard conditions contained in 35 IAC 211.6270; and
 - ii. Pursuant to 35 IAC 218.123(a)(6) any storage tank which is used for non-volatile petroleum liquid is not subject to requirements of 35 IAC 218.123(b).
- f. Cutbacks asphalt tanks are not subject to 40 CFR 60, Subpart UU pursuant to 40 CFR 60.471.
- g. All affected storage tanks are exempted from PM-10 emission limits established in 35 IAC 212.324(b) pursuant to 35 IAC 212.324(d), because all such units operated without any visible emissions.

7.2.5 Operational and Production Limits and Work Practices

- a. Each afterburner shall be in operation at all times that the associated asphalt storage tanks are in operation and emitting VOM. The afterburner shall not be seasonally shut down as would be allowed in 35 IAC 218.107.
- b. The afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not

lower than 1400EF and this temperature shall be maintained during operation of affected storage tanks.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, affected storage tanks are subject to the following:

a. Emissions from the storage tanks described further shall not exceed the limits established in the following construction/operating permits:

i.	<u>96080097</u>	VOM Emissions (lb/hr) (T/yr)	
	<u>Item of Equipment</u>		
	#70, #71, #102, #104, #107	17.03	11.37

ii.	<u>92120044</u>	VOM Emissions (lb/hr) (T/yr)	
	<u>Item of Equipment</u>		
	#98	0.24	0.31

iii.	<u>92120043</u>	VOM Emissions (lb/hr) (T/yr)	
	<u>Item of Equipment</u>		
	#9A	0.51	0.31

iv.	<u>91050032</u>	Annual Emissions (T/yr)	
	<u>Item of Equipment</u>	<u>PM/PM-10</u>	<u>VOM</u>
	#27	0.09	0.31
	#28	0.09	0.31
	#31	0.09	0.31
	#32	0.09	0.31
	#41	0.09	0.31

v.	<u>92060021</u>	Annual Emissions (T/yr)	
	<u>Item of Equipment</u>	<u>PM/PM-10</u>	<u>VOM</u>
	#11	0.09	0.31

b. The above limitations contain revisions to previously issued aforementioned permits. The source has requested that the Illinois EPA establish conditions

in these permits that allow various refinements from the conditions of these aforementioned permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in these permits do not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in these permits and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, emission limits from Conditions 7.2.6(a)(i) and (iii) have been increased and emission limits from Conditions 7.2.6(a)(ii),(iv), and (v) have been decreased [T1R].

- c. Compliance with annual limits shall be determined based on the 12 months of data.

7.2.7 Testing Requirements

- a. Upon reasonable request by the Illinois EPA, the opacity reading of affected storage tanks shall be determined according to USEPA Reference Method 9 and the procedures in 40 CFR 60.11.
- b. Upon request by the Illinois EPA or USEPA, the Permittee shall conduct tests in accordance with procedures of 35 IAC 218.105(d) and (f) to measure the performance of the afterburner(s) controlling affected storage tanks. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing.

7.2.8 Monitoring Requirements

- a. Each afterburner shall be equipped with a continuous temperature monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications all times the afterburner is in use.
- b. Each afterburner shall be equipped with a continuous recorder or the temperature monitoring device(s), such as a strip chart recorder or computer, for measuring combustion chamber temperature of each afterburner.

7.2.9 Recordkeeping Requirements

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

- a. Liquid asphalt throughput for each group of tanks, in terms of T/month and T/year.
- b. Average heating temperature which maintained during storage of liquid asphalt for each group of tanks, in terms of EF.
- c. Monthly and annual emissions of VOM and particulate matter for affected asphalt storage tanks, as calculated in accordance with compliance procedures in Condition 7.2.12.

7.2.10 Reporting Requirements

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

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the PM-10 limitations is assured and achieved by the proper operation and maintenance of the condensers and thermal oxidizers as required by this section and the work-practices inherent in operation of the affected asphalt storage tanks.
- b. To determine compliance with Conditions 5.5.1 and 7.2.6, emissions of VOM from the affected asphalt storage tanks shall be calculated based on the following:

Uncontrolled VOM Emissions

For the purpose of calculating uncontrolled VOM emissions from the asphalt storage tanks, the current version of the TANKS program is acceptable.

Controlled VOM Emissions (Thermal Oxidizer and Condenser)

Uncontrolled emissions (from the TANK program) x
Destruction efficiency of control device

7.3 Group 3: Solvent Storage Tanks

7.3.1 Description

Affected solvent storage tanks are used for keeping solvents used for dilution of cutback asphalt.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 3	Solvent Storage Tanks (EU2)	Storage Tanks #65 #66, and #78 Date of Construction #65/#66: 1960 #78: Prior to 1984	Submerged Loading pipe

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected solvent storage tank" for the purpose of these unit specific conditions is a unit where a solvent for dilution of cutback asphalt is stored.
- b. Each affected solvent storage tank is subject to 35 IAC 218.301 and is not allowed to discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere.

7.3.4 Non-Applicability of Regulations of Concern

- a. Each affected solvent storage tank operated at this site is not subject to 35 IAC 218.120 because the true vapor pressure of storing organic liquids is less than 0.5 psia and therefore exempted from applicability of this section pursuant to 35 IAC 218.119.
- b. Loading operations of solvents into affected storage tank are not subject to 35 IAC 218.122(b) because a vapor pressure of solvents at 70°F is less than 2.5 psia [35 IAC 218.122(c)].

7.3.5 Operational and Production Limits and Work Practices

Affected solvent storage tanks are not allowed to keep any volatile organic liquids with a vapor pressure exceeding 0.75 psia, unless such tank is equipped with a vapor control system(s) described in 35 IAC 218.120.

7.3.6 Emission Limitations

None

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

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

- a. Name and identification number of each solvent kept.
- b. Throughput for each solvent, in terms of gal/month and gal/year.
- c. Maximum true vapor pressure for each solvent kept, in terms of psia.
- d. Monthly and annual emissions of VOM, as calculated in accordance with compliance procedures in Condition 7.3.12.

7.3.10 Reporting Requirements

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

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

To determine compliance with Condition 5.5.1, emissions of VOM from the affected solvent storage tanks shall be calculated based on the following:

For the purpose of calculating uncontrolled VOM emissions from the solvent storage tanks, the current version of the TANKS program is acceptable.

7.4 Group 4: Convertors (Blowing Stills)

7.4.1 Description

Oxidized asphalt is produced by pumping asphalt directly into convertors. Air is injected into the convertor using positive displacement blowers and dispersed with a variety of piping/baffle designs or by mechanical agitation.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 4	Convertors (EU-7)	Convertors #1-#2 with Knock-Out Tanks Convertors #6-#9 with Knock-Out Tanks Date of Construction: #1 and #2 - 1991 #6 - #9 - 1961	Preheater #1 Afterburner #3

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected convertor" for the purpose of these unit specific conditions is a unit designed for production of oxidized liquid asphalt.
- b. Operations of Owens Corning and PM-10 emissions from this location are regulated by 35 IAC Part 212 Subpart Q: Stone, Clay, Glass and Concrete Manufacturing. Specifically, the following emission limits are established in 35 IAC 212.425(b) for specific emission units operated by the Permittee:

No person shall cause or allow the emission of PM-10, other than that of fugitive particulate matter, into the atmosphere to exceed the following limits during any one hour period:

91.6 mg/scm (0.04 gr/scf) for roofing asphalt blowing stills, except stills Nos.1 and 2, at a roofing asphalt manufacturing plant located in the Village of Summit.

- c. i. Any blowing still (convertor) that processes only nonroofing asphalts and that commences construction or modification after May 26, 1981 is subject to the requirements of 40 CFR 60, Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture.

- ii. Any blowing still (convertor) that processes asphalt used for roofing only or for roofing and other purposes, and that commences construction or modification after November 19, 1980 is subject to the requirements of 40 CFR 60, Subpart UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture@.
- iii. All affected converters with construction commenced after dates mentioned above shall not exceed the following limits of PM emissions [40 CFR 60.472(b)]:
 - A. Particulate matter in excess of 0.67 kilograms of particulate per megagram of asphalt charged to the still when a catalyst is added to the still;
 - B. Particulate matter in excess of 0.71 kilograms of particulate per megagram of asphalt charged to the still when a catalyst is added to the still and when No. 6 fuel oil is fired in the afterburner;
 - C. Particulate matter in excess of 0.60 kilograms of particulate per megagram of asphalt charged to the still during blowing without a catalyst;
 - D. Particulate matter in excess of 0.64 kilograms of particulate per megagram of asphalt charged to the still during blowing without a catalyst and when No.6 fuel oil is fired in the afterburner; and
 - E. Exhaust gases with an opacity greater than 0 percent unless an opacity limit for the blowing still when fuel oil is used to fire the afterburner has been established by the USEPA in accordance with the procedures in 40 CFR 60.474(k).
- d. All affected converters are subject to control requirements of 35 IAC 218.946(a) and thermal oxidizers associated with these converters shall achieve reduction in uncontrolled VOM emissions of at least 81% from each such unit.

7.4.4 Non-Applicability of Regulations of Concern

Emission standards established in 35 IAC 212.425(b) for blowing stills (convertors) are not applied to Convertors

#1 and #2 operated at this site, pursuant to 35 IAC 212.425(b)(4).

7.4.5 Operational and Production Limits and Work Practices

- a. The afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F, before blowing process is begun, and this temperature shall be maintained during operation of the affected converter.
- b. The thermal oxidizer shall be in operation at all times that the associated converter is in operation and emitting VOM. The afterburner shall not be seasonally shut down as would be allowed in 35 IAC 218.107.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected Converters #1 and #2 shall not exceed the following limits:

- a. Total production of asphalt from Convertors #1 and #2 shall not exceed 192,000 tons/year and 20,000 tons/month.
- b. Emissions from Convertors #1 and #2 shall not exceed the following:

<u>Pollutants</u>	<u>(lb/ton) Asphalt</u>	<u>Emissions (Total) (ton/yr)</u>
PM/PM-10	0.15	14.4
VOM	0.1	9.6
CO	1.2	115.2

The above limitations contain revisions to previously issued aforementioned construction permit #96060091. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. These limits continue to ensure that the construction and/or modification addressed in this permit do not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the

most current and accurate information for the source. Specifically, VOM emission limits have been decreased based on the new emission factor [T1R].

- c. Compliance with annual limits shall be determined based on the 12 months rolling period of data.

7.4.7 Testing Requirements

- a. Upon reasonable request by the Illinois EPA, the opacity reading of affected converter shall be determined according to USEPA Reference Method 9 and the procedures in 40 CFR 60.11.
- b. For determining particulate matter concentration and volumetric flow rate of the effluent gas, Method 5A shall be used.
- c. Upon request by the Illinois EPA or USEPA, the Permittee shall conduct tests in accordance with procedures of 35 IAC 218.105(d) and (f) to measure the performance of the afterburner(s) controlling affected converters. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing.

7.4.8 Monitoring Requirements

- a. Each afterburner shall be equipped with a continuous temperature monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications all times the afterburner is in use.
- b. The monitoring instrument shall have an accuracy of " 10EC over its range.
- c. Each afterburner shall be equipped with a continuous recorder or the temperature monitoring device(s), such as a strip chart recorder or computer, for measuring combustion chamber temperature of each afterburner.

7.4.9 Recordkeeping Requirements

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

- a. Pursuant to 35 IAC 218.991(a)(2), the Permittee shall collect and record all of the following information each day and maintain the information at the source:

- i. Control device monitoring data;
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission unit; and
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages.
- b. Total asphalt throughput for the entire group of converters, in terms of ton/month and ton/year.
 - c. Total asphalt throughput for converters #1 and #2 combined, in terms of ton/month and ton/year.
 - d. Records of most recent testing results.
 - e. Emissions of VOM and PM/PM-10 for the entire group and separately for converters #1 and #2 combined, and calculated in accordance with compliance procedures in Condition 7.4.12.

7.4.10 Reporting Requirements

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

- a. Pursuant to 35 IAC 218.991(a)(3) the owner/operator of any emission unit subject to 35 IAC Part 218, Subpart QQ shall notify the Illinois EPA in the following instances:

Any record showing violation of Section 218.991 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

- b. Report of Deviations

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the afterburners and the work-practices inherent in operation of the converters.
- b. To determine compliance with Conditions 5.5.1 and 7.4.6, emissions of VOM and PM/PM-10 from the affected converters shall be calculated based on the following:

VOM Emissions

Asphalt Production (tons) x (0.1 lb VOM/ton of asphalt)

PM/PM-10 Emissions

Asphalt Production (tons) x (0.15 lb PM/PM-10/ton of asphalt)

7.5 Group 5: Loading Racks

7.5.1 Description

Final liquid asphalt products are loaded into trucks by using top entering pipes. Fumes from the loading racks are incinerated in a fume incinerators.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 5	Loading Racks (EU-9/10)	Loading Racks #1, #2, and #9	Thermal Oxidizers and Fiberbed Filters
		Loading Racks #4, #5, and PV1	Thermal Oxidizers and Fiberbed Filters
Date of Construction: After April, 1972			

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected loading rack" for the purpose of these unit specific conditions is an equipment for loading final asphalt liquid products into trucks by using top entering pipes.
- b. Each affected loading rack is regulated by 35 IAC Part 218, Subpart TT ~~Other Emission Units~~ and subject to the control requirements of 35 IAC 218.986(a) that requires achieving an overall reduction in uncontrolled VOM emissions of at least 81 percent from associated capture and control equipment.
- c. Affected loading racks are located in the area designated as non-attainment for PM-10 emissions, pursuant to 35 IAC 212.324(a). Therefore, each affected loading rack is subject to 35 IAC 212.324(b), which provides that emissions of PM-10 from each such unit shall not exceed 68.7/scm (0.03 gr/scf) during any one hour period.
- d. The affected loading racks are subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one

hour period from any existing process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.5.4 Non-Applicability of Regulations of Concern

Operations of affected loading racks are not subject to requirements of 35 IAC 218.122(a) based on the following reasons:

- a. Emission limitations established in 35 IAC 218.122(a) are applicable only for loading operations operated without submerged loading pipes or equally effective controlling device.
- b. If no odor nuisance exists the limitations of 35 IAC 218.122(a) shall not apply to the loading of volatile organic liquid with a vapor pressure less than 17.24 kPa (2.5 psia) at 294.3EK (70EF).

7.5.5 Operational and Production Limits and Work Practices

- a. For any process emission unit located in the PM-10 non-attainment areas designated in 35 IAC 212.324(a), the Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. Proper maintenance shall include the following minimum requirements:
 - i. Visual inspection of air pollution control equipment;
 - ii. Maintenance of an adequate inventory of spare parts; and
 - iii. Expeditious repairs, unless the emission unit is shutdown.
- b. The afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400EF, before loading process is begun, and this temperature shall be maintained during operation of the affected loaded rack.
- c. The thermal oxidizer shall be in operation at all times that the associated loading rack is in operation and emitting VOM. The afterburner shall

not be seasonally shut down as would be allowed in 35 IAC 218.107.

7.5.6 Emission Limitations

None

7.5.7 Testing Requirements

Upon request by the Illinois EPA or USEPA, the Permittee shall conduct tests in accordance with procedures of 35 IAC 218.105(d) and (f) to measure capture efficiency and performance of the afterburner(s) controlling affected loading racks. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing.

7.5.8 Monitoring Requirements

- a. Each afterburner shall be equipped with a continuous temperature monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications all times the afterburner is in use.
- b. Each afterburner shall be equipped with a continuous recorder or the temperature monitoring device(s), such as a strip chart recorder or computer, for measuring combustion chamber temperature of each afterburner.

7.5.9 Recordkeeping Requirements

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

- a. Pursuant to 35 IAC 218.991(a)(2), the Permittee shall collect and record all of the following information each day and maintain the information at the source:
 - i. Control device monitoring data;
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission unit; and
 - iii. Maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed, including dates and duration of any outages.

- b. Total liquid asphalt products throughput, in terms of T/month and T/year.
- c. Emissions of VOM and PM/PM-10 for the entire group and calculated in accordance with compliance procedures in Condition 7.5.12.
- d. Records of most recent testing results.

7.5.10 Reporting Requirements

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

- a. Pursuant to 35 IAC 218.991(a)(3) the owner/operator of any emission unit subject to 35 IAC Part 218, Subpart TT shall notify the Illinois EPA in the following instances:

Any record showing violation of Section 218.991 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.

- b. Report of Deviations

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the thermal oxidizers and filters as required by this section and the work-practices inherent in operation of the affected loading racks.
- b. To determine compliance with Condition 5.5.1, emissions of VOM and PM from the affected loading racks shall be calculated based on the following:

VOM Emissions

For Loading Racks #1, #2, and #5:

Liquid asphalt throughput (tons) x 0.5441 lb VOM/ton of product*

For Loading Racks #4:

Liquid asphalt throughput (tons) x 0.0981 lb VOM/ton of product*

For Loading Racks #9:

Liquid asphalt throughput (tons) x 0.7107 lb VOM/ton of product*

For Loading Rack PV1:

Liquid asphalt throughput (tons) x 0.0669 lb VOM/ton of product*

PM/PM-10 Emissions

For Loading Racks #1, #2, and #5:

Liquid asphalt throughput (tons) x 0.1535 lb PM/ton of product*

For Loading Racks #4:

Liquid asphalt throughput (tons) x 0.0277 lb PM/ton of product*

For Loading Racks #9:

Liquid asphalt throughput (tons) x 0.2055 lb PM/ton of product*

For Loading Rack PV1:

Liquid asphalt throughput (tons) x 0.0189 lb PM/ton of product*

* Derived from the most recent stack test results

7.6 Group 6: Coating Operations

7.6.1 Description

The hot liquid asphalt is applied to felt to make asphalt roofing products and cooled in the cooling area.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 6	Coating Operations (EU-13/14/16)	Coater/Coating Surge Tank (Constructed in 1986)	None
		Asphalt Filler Mixer Adhesive Melt Tank Adhesive Use Tank (All Units Constructed After 1972)	Dust Collector Fiber Filter None
		Cooling Section (Constructed in 1978)	None

7.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating operations" for the purpose of these unit specific conditions is an equipment to prepare and apply hot liquid asphalt to felt to make asphalt roofing products.
- b. The affected coating operations are subject to the following control requirements of 35 IAC 218.926(b)(1):

For coating lines, the daily-weighted average VOM content shall not exceed 0.42 kg VOM/l (3.5 lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied during any day.

- c. Operations of Owens Corning and PM-10 emissions from this location are regulated by 35 IAC Part 212 Subpart Q: Stone, Clay, Glass and Concrete Manufacturing. Specifically, the following emission limits are established in 35 IAC 212.425(b) for specific emission units operated by the Permittee:

No person shall cause or allow the emission of PM-10, other than that of fugitive particulate matter, into the atmosphere to exceed the following limits during any one hour period:

- i. 57.2 mg/scm (0.025 gr/scf) for coater and cooling loop ventilator at a roofing asphalt

manufacturing plant located in the Village of Summit.

- ii. 0.03 kg/Mg (0.06 lb/T) of asphalt mixed for asphalt mixer at a roofing asphalt manufacturing plant located in the Village of Summit.
- d. i. Any saturator (coater) that commences construction or modification after November 19, 1980 is subject to the requirements of 40 CFR 60, Subpart UU **Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture**.
- ii. All affected coaters with construction commenced after dates mentioned above shall not exceed the following limits of PM emissions [40 CFR 60.472(a)]:
 - A. Particulate matter in excess of 0.04 kilograms of particulate per megagram of asphalt shingle or mineral-surfaced roll roofing produced; or

0.4 kilograms per megagram of saturated felt or smooth-surfaced roll roofing produced.
 - B. Exhaust gases with opacity greater than 20 percent.
- e. The affected coating operations are subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing 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)].

7.6.4 Non-Applicability of Regulations of Concern

An affected coating operations are not subject to 35 IAC 218.301 pursuant to 35 IAC 218.926(b)(1).

7.6.5 Operational and Production Limits and Work Practices

For any process emission unit located in the PM-10 non-attainment areas designated in 35 IAC 212.324(a), the

Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. Proper maintenance shall include the following minimum requirements, pursuant to 35 IAC 212.324(f):

- a. Visual inspection of air pollution control equipment;
- b. Maintenance of an adequate inventory of spare parts; and
- c. Expeditious repairs, unless the emission unit is shutdown.

7.6.6 Emission Limitations

None

7.6.7 Testing Requirements

Testing for VOM content of coatings and other VOM containing materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

Upon reasonable request by the Illinois EPA, the VOM content of specific coatings used on the affected coater shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

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

- a. Pursuant to 35 IAC 218.991(b)(2), the Permittee shall collect and record all of the following information each day for coating operation and maintain the information at the source:
 - i. The name and identification of each coating as applied on each coating line;
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the

definition of VOM) as applied each day on each coating line; and

- iii. The daily-weighted average VOM content of all coatings as applied on each coating line as defined in 35 IAC 211.1670.
- b. Production of asphalt shingles or mineral-surfaced roll roofing, in terms of T/month and T/year.
- c. Asphalt coating and clean-up solvent usage (gal/mo and gal/yr);
- d. The VOM and HAP content of each asphalt coating, % by wt.;
- e. Density of each applied asphalt coating and clean-up solvent (lb/gal);
- f. The VOM and HAP content of each clean-up solvent (lb/gal);
- g. Records of the testing of VOM and HAP content of each coating and clean-up solvent as tested, pursuant to conditions of this section, which include the following:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- h. Total VOM and HAP emissions calculated based on the recordkeeping requirements and compliance procedures of Condition 7.6.12;
- i. Emissions of PM/PM-10 calculated in accordance with compliance procedures in Condition 7.6.12.

7.6.10 Reporting Requirements

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

- a. Of any violation of the requirements of 35 IAC Part 218, Subpart PP by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation.

- b. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating operations 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 the activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings and clean-up solvents at this source, provided that the affected coating operations continue to comply with the conditions of this section.

7.6.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the dust collector and filters as required by this section and the work-practices inherent in operation of the affected coating operations.
- b. Compliance of the affected coating operations with daily-weighted average VOM limitation in Condition 7.6.3(b) shall be based on the recordkeeping requirements established in Condition 7.6.9 and by use the following equation, as defined in 35 IAC 211.1670:

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

Where:

VOM_w = The average VOM content of two or more coatings as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM);

- n = The number of different coatings as applied each day on a coating line;
- V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal);
- C_i = The VOM content of each coating as applied each day on a coating line in units of kg VOM/l (lb VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM); and
- V_T = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).
- c. To determine compliance with the limits in Condition 5.5.1, total emissions of PM and VOM from the affected coating operations shall be calculated based on the emission factors for appropriate type of shingle asphalt coating as established in Tables 11.2-2 and 11.2-4 of AP-42.

7.7 Group 7: Material Handling and Unloading Operations

7.7.1 Description

Minerals for asphalt roofing are unloaded from a carrier and transferred to the storage silos.

7.7.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description/Date of Construction	Emission Control Equipment
Group 7	Material Handling and Unloading Operations (EU 13/15)	Lower Surge Hopper/1986; Filler Silo and Unloading/NA;	Dust Collector Dust Collector
		Upper Surge Hopper/NA; Backup Upper Surge Hopper/NA;	Dust Collector Dust Collector
		Parting Agent Silo and Unloading/1993;	Dust Collector
		Filler Heater/1988;	None
		Surfacing Material Silos and Unloading/NA;	Dust Collectors
		Surfacing Material Surge Bin/NA;	Dust Collector
		Surfacing Material Bins/NA;	Dust Collector None
		Material Surfacing Area Parting Agent Use Bin (Constructed After 1972)	Dust Collector

7.7.3 Applicability Provisions and Applicable Regulations

- a. A "affected material handling and unloading operations" for the purpose of these unit specific conditions are process units for storing and transferring minerals for asphalt roofing.
- b. Operations of Owens Corning and PM-10 emissions from this location are regulated by 35 IAC Part 212 Subpart Q: Stone, Clay, Glass and Concrete Manufacturing. Specifically, the following emission limits are established in 35 IAC 212.425(b) for specific emission units operated by the Permittee:

No person shall cause or allow the emission of PM-10, other than that of fugitive particulate matter, into the atmosphere to exceed the following limits during any one hour period:

34.3 mg/scm (0.015 gr/scf) for mineral filler handling emission units at a roofing asphalt manufacturing plant located in the Village of Summit.

- c. i. Any mineral handling and storage facility that commences construction or modification after November 19, 1980 is subject to the requirements of 40 CFR 60, Subpart UU ~~A~~Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture@.
- ii. Opacity from any mineral handling and storage facility shall not exceed 1 percent [40 CFR 60.472(d)].
- d. The affected material handling and unloading operations are subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing 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

For any process emission unit located in the PM-10 non-attainment areas designated in 35 IAC 212.324(a), the Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. Proper maintenance shall include the following minimum requirements, pursuant to 35 IAC 212.324(f):

- a. Visual inspection of air pollution control equipment;
- b. Maintenance of an adequate inventory of spare parts; and
- c. Expeditious repairs, unless the emission unit is shutdown.

7.7.6 Emission Limitations

None

7.7.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the particulate matter concentration and volumetric flow rate of the effluent gases, shall be determined according to USEPA Reference Method 5A.

7.7.8 Monitoring Requirements

None

7.7.9 Recordkeeping Requirements

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

- a. Total raw material or product throughput, in terms of ton/month and ton/year.
- b. Recordkeeping of maintenance and repair [35 IAC 212.324(g)]:
 - i. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment.
 - ii. The owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.
 - iii. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.
 - iv. Copies of all maintenance and repair records shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.
 - v. Upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when air the air pollution control equipment

was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

- c. Monthly and annual emissions of PM/PM-10 calculated in accordance with compliance procedures established in Condition 7.7.12.

7.7.10 Reporting Requirements

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

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

- a. Compliance with the PM/PM-10 limitations in this section is assured and achieved by the proper operation and maintenance of the dust collectors as required by this section and the work-practices inherent in operation of the affected material handling and unloading operations.
- b. To determine compliance with Condition 5.5.1, emissions of PM from the affected material handling and unloading operations shall be calculated based on the following:

PM/PM-10 Emissions = (Air flow, cfm) x (Estimated Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [1 - (Dust Collector Efficiency* (%)/100)].

* As specified by manufacturer or vendor of the dust collector, or air testing of the actual equipment.

7.8 Group 8: Mineral Rubber (MR) Process Units

7.8.1 Description

The process of the MR asphalt begins by pouring molten asphalt onto a large floor and allowing it to cool and harden. After the asphalt has hardened, the process is continued by breaking up the asphalt into large pieces and transporting to a conveyor system in which the large pieces are conveyORIZED through a grinding system and eventually bagged.

7.8.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 8	Mineral Rubber (MR) Process Units (EU-18)	Drying/Grinding and Packaging of Asphalt by Application of Conveyor, Hammermill, and Bagger Date of Construction: 1996	Dust Collector

7.8.3 Applicability Provisions and Applicable Regulations

- a. An affected "MR process unit" for the purpose of these unit specific conditions is a unit used for production and packaging of ground asphalt.
- b. Each affected MR process unit is subject to 35 IAC 212.321(b)(1), which provides that:

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

- c. Affected MR process units are located in the area designated as non-attainment for PM-10 emissions, pursuant to 35 IAC 212.324(a). Therefore, each affected MR process unit is subject to 35 IAC 212.324(b), which provides that emissions of PM-10 from each such unit shall not exceed 68.7/scm (0.03 gr/scf) during any one hour period.

7.8.4 Non-Applicability of Regulations of Concern

None

7.8.5 Operational and Production Limits and Work Practices

For any process emission unit located in the PM-10 non-attainment areas designated in 35 IAC 212.324(a), the Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards in 35 IAC 212.324 shall be met at all times. Proper maintenance shall include the following minimum requirements, pursuant to 35 IAC 212.324(f):

- a. Visual inspection of air pollution control equipment;
- b. Maintenance of an adequate inventory of spare parts; and
- c. Expeditious repairs, unless the emission unit is shutdown.

7.8.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected MR process is subject to the following:

<u>Item of Equipment</u>	<u>PM-10 Emissions (ton/yr)</u>	<u>PM Emissions (ton/yr)</u>
MR Grinding and Bagging System	0.46	4.57

- a. The above limitations were established in the permit #96010122, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in this permit do not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].
- b. These limits are based on the allowable emissions of 0.03 gr/scf, a maximum flow rate 7,800 scfm and the maximum throughput.
- c. Compliance with annual limits shall be determined based on the 12 months rolling period of data.

7.8.7 Testing Requirements

Upon reasonable request by the Illinois EPA, the particulate matter concentration and volumetric flow rate of the effluent gases, shall be determined according to USEPA Reference Method 5A.

7.8.8 Monitoring Requirements

None

7.8.9 Recordkeeping Requirements

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

- a. Total raw material or product throughput, in terms of ton/month and ton/year.
- b. Recordkeeping of maintenance and repair [35 IAC 212.324(g)]:
 - i. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment.
 - ii. The owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.
 - iii. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.
 - iv. Copies of all maintenance and repair records shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.
 - v. Upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when air the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made.

- c. Monthly and annual emissions of PM/PM-10 calculated in accordance with compliance procedures established in Condition 7.8.12.

7.8.10 Reporting Requirements

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

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.8.12 Compliance Procedures

- a. Compliance with the PM/PM-10 limitations in this section is assured and achieved by the proper operation and maintenance of the dust collectors as required by this section and the work-practices inherent in operation of the affected MR process unit.
- b. To determine compliance with Condition 5.5.1, emissions of PM from the affected MR process unit shall be calculated based on the following:

PM/PM-10 Emissions = (Air flow, cfm) x (Estimated Dust Loading^{*}, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [1 - (Dust Collector Efficiency^{*} (%)/100)].

* As specified by manufacturer or vendor of the dust collector, or air testing of the actual equipment.

7.9 Group 9: Gasoline Storage Tank

7.9.1 Description

Gasoline storage tank is associated with gasoline non-retail dispensing operations at this location.

7.9.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 9	Gasoline Storage Tank	Storage Capacity - 300 Gallons Date of Construction: Prior to 1978	None

7.9.3 Applicability Provisions and Applicable Regulations

- a. An "affected gasoline storage tank" for the purpose of these unit specific conditions is used for non-retail dispensing operations at this location.
- b. The affected gasoline storage tank is subject to 35 IAC 218.122(b) and 218.583(a)(1). These requirements are discussed further in Condition 7.9.5.

7.9.4 Non-Applicability of Regulations of Concern

- a. The gasoline dispensing operations are exempt from permit requirements for its vapor collection and control systems since the Permittee has submitted to the Illinois EPA a registration of the vapor collection and control systems within 30 days of completion of installation [35 IAC 218.586(h)].
- b. The affected gasoline storage tank is exempted from applicability of 35 IAC 218.583(a)(2) and (a)(3) because the tank capacity is less than 575 gallons [35 IAC 218.583(b)(3)].

7.9.5 Operational and Production Limits and Work Practices

- a. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 218.122(b)].
- b. No person shall cause or allow the transfer of gasoline from any delivery vessel into the stationary storage tank at a gasoline dispensing operations unless the tank is equipped with a submerged loading pipe [35 IAC 218.583(a)].

7.9.6 Emission Limitations

In addition to the source wide emission limitations in Condition 5.5.1 the affected gasoline storage tank is subject to the following:

None

7.9.7 Testing Requirements

None

7.9.8 Monitoring Requirements

None

7.9.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the storage tank to demonstrate compliance with Condition 5.5.1:

- a. Monthly and annual gasoline throughput (gallons/month and gallons/year); and
- b. Total monthly and annual emissions of VOM calculated based on the compliance procedures in Condition 7.9.12.

7.9.10 Reporting Requirements

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

None

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.9.12 Compliance Procedures

To determine compliance with Condition 5.5.1, VOM emissions from the storage tank shall be calculated based on the following equation and standard emission factor for a Stage II vapor control systems established in AP-42, Table 5.2-7, AEvaporative Emissions from Gasoline Service Station Operations:

Emissions (lb) = Gasoline Throughput (gal) x 3.1 lb/1,000 gal Throughput

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after March 1, 2000 unless the permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution

Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

8.6.3 Test Reports

Unless otherwise specified elsewhere in the permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;

- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 First Avenue
Maywood, Illinois 60153

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

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

- iv. USEPA - Air Branch

United States EPA (AR - 17J)
Air & Radiation Branch (Illinois - Indiana)
77 W. Jackson Boulevard
Chicago, Illinois 60604

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

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (Title I Provisions) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this

permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, operations regulated or required under the permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or this Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Section 39.5(7)(e)(ii) of the Act]
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certification shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications must be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defenses to Enforcement Action

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operation logs, or other relevant evidence:
 - i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working day of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the

emission limitations, standards, or regulations in the permit.

- b. This provision is in addition to any emergency or upset provisions contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1

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

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

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

Where:

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

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

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

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

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

- c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

<u>Metric</u>		<u>English</u>	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2 Attachment 2 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

AB:psj