

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

PERMITTEE

Victor-Reinz Division
Dana Corporation
Attn: Kanu Shah
1945 Ohio Street
Lisle, Illinois 60532

Application No.: 96030034

I.D. No.: 043055AAX

Applicant's Designation:

Date Received: July 22, 2002

Subject: Gasket and Engine Testing Facility

Date Issued: January 15, 2003

Expiration Date: January 15, 2008

Location: 1945 Ohio Street, Lisle

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of eight engine testing cells, one boiler, one diesel storage tank, one gasoline storage tank, gasket cutting operation, silk screening operation, coating operation, and diesel fired emergency generator pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Carbon Monoxide (CO)). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Emissions and operation of eight engine test cells combined shall not exceed the following limits:
 - a. Diesel Fuel Mode:

<u>Fuel Usage</u>		<u>Emission Factors</u>		<u>Emissions</u>	
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Pollutant</u>	<u>(Lb/1,000 Gal)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
18,000	180,000	NO _x	469.0	4.2	42.2
		CO	102.0	0.9	9.2
		SO ₂	31.2	0.3	2.8
		VOM	32.1	0.3	2.9
		PM	33.5	0.3	3.0

These limits define the potential emissions of the eight engine test cells using diesel fuel and are based on the maximum fuel usage and AP-42 emission factors.

b. Gasoline Fuel Mode:

Fuel Usage (Gal/Mo)(Gal/Yr)		Emission Factors Pollutant (Lb/1,000 Gal)		Emissions (Ton/Mo)(Ton/Yr)	
10,000	100,000	NO _x	102.00	0.51	5.1
		CO	1,700.00	8.50	85.0
		SO ₂	5.31	0.03	0.3
		VOM	148.00	0.74	7.4
		PM	6.47	0.03	0.3

These limits define the potential emissions of the eight engine test cells using gasoline fuel and are based on the maximum fuel usage and AP-42 emission factors (Mobile sources for CO).

- c. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- d. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

3. Emissions and operation of the boiler shall not exceed the following limits:

a. Natural Gas Fuel Mode:

Fuel Usage (mmscf/Yr)	Emission Factors Pollutant (Lb/mmscf)		Emissions (T/Yr)
7.6	NO _x	100	0.4
	CO	84	0.4
	VOM	5.8	0.1
	PM	11.9	0.1
	SO ₂	0.6	0.1

These limits define potential emission of the boiler using natural gas fuel and are based on fuel usage and AP-42 emission factors.

b. #2 Fuel Oil Mode:

Fuel Usage (Gal/Yr)	Emission Factors Pollutant (Lb/1,000 Gal)		Emissions (T/Yr)
10,000	NO _x	20.0	0.1
	CO	5.0	0.1
	PM	2.0	0.1

These limits define the potential emissions of the boiler using #2 fuel oil and are based on the maximum fuel usage and AP-42 emission factors.

- c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

- 4a. Emissions and operation of the emergency generator shall not exceed the following limits:

<u>Fuel Usage</u>	<u>Pollutant</u>	<u>Emission Factors (Lb/1,000 Gal)</u>	<u>Emissions (Ton/Yr)</u>
3,500 gal/yr	NO _x	469.0	0.9
	CO	102.0	0.2
	SO ₂	31.2	0.1
	VOM	32.1	0.1
	PM	33.5	0.1

These limits define the potential emissions of the emergency generator and are based on the maximum fuel usage and AP-42 emission factors.

- b. Compliance with annual limit shall be determined on monthly basis from the sum of the data for the current month plus the preceding 11 months.
- 5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
 - 6. At the above location, the Permittee shall not keep, store, or utilize:
 - a. Distillate fuel oil (Grades No. 1 and 2) with a sulfur content greater than the larger of the following two values:
 - i. 0.28 weight percent, or
 - ii. The wt. percent given by the formula: Maximum wt. percent sulfur = (0.000015) x (Gross heating value of oil, Btu/lb).
 - 7. Organic liquid by-products or waste materials shall not be used in these fuel combustion emission sources without written approval from the Illinois EPA.
 - 8. The Illinois EPA shall be allowed to sample all fuels stored at the above location.

- 9a. Permittee shall maintain records of the following items for the eight engine testing cells:
 - i. Diesel fuel usage (gal/month and gal/year); and
 - ii. Gasoline fuel usage (gal/month and gal/year).
 - b. The Permittee shall maintain records of the following items for the boiler:
 - i. Natural gas usage (mmscf/year); and
 - ii. #2 fuel oil usage (gal/year).
 - c. The Permittee shall maintain records of the diesel fuel usage for the emergency generator (gallons/year).
 - d. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
10. 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.
 11. This permit is issued based on negligible emissions of particulate matter from the gasket cutting operation. For this purpose, emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
 12. Volatile organic material emissions from the gasoline and diesel storage tanks shall not exceed 0.4 ton/year. These limits are based on the maximum annual throughput (167,000 gal/year) and emissions calculated using USEPA's Tanks software.
 - 13a. This permit is issued based on the silk screening operations at this source meeting the exemption level for exclusion from the requirements of Part 218, Subpart TT. This is a result of potential VOM emissions from these sources being less than 25 tons/yr.
 - i. Upon written request from the Illinois EPA, the Permittee shall promptly submit copies of records to the Illinois EPA which

address applicability of Part 218, in accordance with 35 Ill. Adm. Code 218.990.

- ii. The Permittee shall notify the Illinois EPA and obtain appropriate permits from the Illinois EPA in advance of a change in operation which would result in potential VOM emissions of 25 tons/year or more.
 - b. The combined emissions from all miscellaneous metal parts and products coating shall not exceed 15 lbs/day before the application of capture systems and control devices.
 - c. The Permittee shall comply with the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(a) and (b).
 - d. The Permittee shall maintain records of the following information for the coating operation, pursuant to 35 Ill. Adm. Code 218.211(b)(2):
 - i. The name and identification number of each coating as applied (daily).
 - 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 (daily).
 - iii. VOM emissions from the coating line (lbs/day).
 - e. The Permittee shall notify the Illinois EPA of any record showing that the total VOM emissions from the coating line exceed 15 lbs in any day by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.
14. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
15. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- a. Diesel and gasoline fuel usage for the engine test cells (gallons/yr);
 - b. Natural gas usage for the boiler (mmscf/yr);
 - c. #2 fuel oil usage for the boiler (gallons/yr);
 - d. Diesel fuel usage for the emergency generator (gallons/yr); and
 - e. Facility CO emissions using fuel usage and emission factors for each emission unit (ton/yr).

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

16. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
1340 North Ninth Street
P.O. Box 19276
Springfield, Illinois 62794-9276

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

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

If you have any questions on this permit, please call John Blazis at 217/782-2113.

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

DES:JPB:jar

cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
USEPA - Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from operation of engine testing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of CO at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1. Emissions and operation of eight engine test cells combined shall not exceed the following limits:

- a. Diesel Fuel Mode:

Fuel Usage		Emission Factors		Emissions	
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Pollutant</u>	<u>(Lb/1,000 Gal)</u>		
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>				
18,000	180,000	NO _x	469.0	4.2	42.2
		CO	102.0	0.9	9.2
		SO ₂	31.2	0.3	2.8
		VOM	32.1	0.3	2.9
		PM	33.5	0.3	3.0

This table defines the potential emissions of the eight engine test cells using diesel fuel and is based on the maximum fuel usage and AP-42 emission factors.

- b. Gasoline Fuel Mode:

Fuel Usage		Emission Factors		Emissions	
<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>Pollutant</u>	<u>(Lb/1,000 Gal)</u>		
<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>				
10,000	100,000	NO _x	102.00	0.51	
5.1		CO	1,700.00	8.50	
85.0		SO ₂	5.31	0.03	
0.3		VOM	148.00	0.74	
7.4		PM	6.47	0.03	
0.3					

This table defines the potential emissions of the eight engine test cells using gasoline fuel and is based on the maximum fuel usage and AP-42 emission factors (Mobile source for CO).

2. Emissions and operation of the boiler shall not exceed the following limits:

a. Natural Gas Fuel Mode:

<u>Fuel Usage</u> (mmscf/Yr)	<u>Emission Factors</u> <u>Pollutant (Lb/mmscf)</u>		<u>Emissions</u> (T/Yr)
7.6	NO _x	100	0.4
	CO	84	0.4
	VOM	5.8	0.1
	PM	11.9	0.1
	SO ₂	0.6	0.1

These limits define the potential emissions of the boiler using natural gas fuel and are based on the maximum fuel usage and AP-42 emission factors.

b. #2 Fuel Oil Mode:

<u>Fuel Usage</u>	<u>Emission Factors</u> <u>Pollutant (Lb/1,000 Gal)</u>		<u>Emissions</u> (T/Yr)
10,000 gal/yr	NO _x	20.0	0.1
	CO	5.0	0.1
	PM	2.0	0.1

These limits define the potential emissions of the boiler using #2 fuel oil and are based on the maximum fuel usage and AP-42 emission factors.

3. Emissions and operation of the emergency generator shall not exceed the following limits:

<u>Fuel Usage</u>	<u>Pollutant</u>	<u>Emission Factors</u> <u>(Lb/1,000 Gal)</u>	<u>Emissions</u> (Ton/Yr)
3,500 gal/yr	NO _x	0.61	1.06
	CO	0.13	0.23
	SO ₂	0.04	0.80
	VOM	0.05	0.90
	PM	0.04	0.80

These limits define the potential emissions of the emergency generator and are based on the maximum fuel usage and AP-42 emission factors.

4. This permit is issued based on negligible emissions of particulate matter from the gasket cutting operation. For this purpose, emissions from each emission source shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.

5. Volatile organic material emission from gasoline and diesel storage tank shall not exceed 0.4 ton/year. These limits are based on the maximum annual throughput (167,000 gal/year) and emissions calculated using USEPA's Tanks software.

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