

217/782-2113

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

PERMITTEE

DaimlerChrysler Corporation
Attn: Kevin Bartek
3000 West Chrysler Drive
Belvidere, Illinois 61008

<u>Application No.:</u> 96020045	<u>I.D. No.:</u> 007005AAF
<u>Applicant's Designation:</u>	<u>Date Received:</u> February 14, 1996
<u>Operation of:</u> Automobile Assembly Facility	
<u>Date Issued:</u> November 19, 2002	<u>Expiration Date²:</u> November 19, 2007
<u>Source Location:</u> 3000 West Chrysler Drive, Belvidere, Boone County	
<u>Responsible Official:</u> Kurt Kavajecz, Plant Manager	

This permit is hereby granted to the above-designated Permittee to OPERATE an automobile assembly facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: April 30, 2004
Revision Date Issued: April 5, 2005
Purpose of Revision: Minor Modification

This minor modification is being made to clarify how compliance with the coating rules in 35 IAC 215.204(a) (1) is determined. There are also various typos and rewording of conditions for clarification of meaning.

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

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

DES:MVH:psj

cc: Illinois EPA, FOS, Region 2

- 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

DaimlerChrysler Corporation
3000 West Chrysler Drive
Belvidere, Illinois 61008
PHONE #

I.D. No.: 007005AAF
Standard Industrial Classification: 3711

1.2 Owner/Parent Company

DaimlerChrysler Corporation
800 Chrysler Drive
Auburn Hills, Michigan 48326

1.3 Operator

Belvidere Assembly Plant
3000 West Chrysler Drive
Belvidere, Illinois 61008

Kurt Kavajecz
815/547-2100

1.4 General Source Description

The DaimlerChrysler automobile assembly operation is located at 3000 West Chrysler Drive in Belvidere, Boone County. The source assembles automobiles. The principal pollutant emitted is volatile organic material (VOM) from evaporation of the solvents in the coating used. In addition, the source operates several boilers/air heaters, bake ovens for drying the coatings, stamping operations and a wastewater treatment plant.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ED	Electrodeposition
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SCR	Stone and Chip Resistant
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Paint Shop Deionizer
Uni Prime E-Coat Storage Tanks
No Bake Repair Brush and Aerosol Applications
Underground Naphtha Storage Tank
Sulfuric Acid Tank for Plant Wastewater Treatment

- 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:

Various Filling Operations such as Brake Fluid, Power Steering Fluid, Manual and Automatic Transmission Fluids and Storage of those Fluids.
Fascia Bulk Pellet Storage Tanks
Day Pellet Tanks
Body Phosphate Prewash and Prep Deck
Welding

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

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

Die casting machines where a metal or plastic is formed under pressure in a die [35 IAC 201.210(a) (12)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW

(150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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

3.2 Compliance with Applicable Requirements

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

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
1 (PS001)	Prime Coat: Electrodeposition Dip Tank and Electrocoat Oven Electrocoat Oven Firing Rate (All Zones Combined): 17.9 mmBtu/Hr	1983	Regenerative Thermal Oxidizer (RTO) on Bake Oven Only E-Coat RTO Firing Rate: 8 mmBtu/hr
2 (PS002)	Three Zone Powder Antichip Coating with Powder Recycling and Three Zone Bake Ovens Bake Oven Firing Rate (All Stages Combined): 61.64 mmBtu/hr	1997	None
3 (PS002)	Dry Sanding Booth after Antichip Curing	1997	Baghouse (CT-PS-018)
4 (PS003)	Top Coat Lines North and South: Each Line has Automatic and Manual Spray Stations and 5-Zone Bake Oven Bake Oven Firing Rate: (All Stages from Both Lines Combined): 26.8 mmBtu/hr	1987	Wet Scrubber on Each Spray Booth. Topcoat RTO on Zone 1 of Bake Ovens Topcoat RTO Firing Rate: 10 mmBtu/hr
5	Reprocess Sanding Booth	1987	Dust Collectors (CT-PS-018)
6	Top Coat Reprocess Spray Booth with Automatic and Manual Spray Stations and Four Zone Bake Ovens	1985	Wet Scrubber on Spray Booth, Topcoat RTO on Zone 1 of Bake Oven
7 (TA002)	Low Bake Topcoat Repair Line	1998	Filters (CT-AT)
8	Underbody Blackout (Air Dry) and Solvent Wipe Spray Booth	1993	Filters (CT-PS-025)
9	Underbody Sound Deadener Spray Booth	1993	Filters
10	Paint Sludge Dryer with Afterburner	1993	None
11	Solvent Purge		None
12	Fluidized Bed Tool Cleaner with Internal Afterburner	1994	None
13 (TA004)	Plantwide solvent Body Wiping	N/A	None
14 (TA005)	Miscellaneous Cleaners and Solvents	N/A	None
15 (TA006)	Front Window Installation	N/A	None
16 (TA007)	Rear Window Installation	N/A	None
17 (TA008)	Gasoline Fill Stations	1990	None
18 (TA008)	Gasoline Storage Tanks	1978	Vapor Balance

Emission Unit	Description	Date Constructed	Emission Control Equipment
19 (TA009)	Antifreeze Fill Stations	1978	None
20 (TA009)	Windshield Washer Fill Station	1993	None
21 (SP001)	Stamping Washers	1993	None
22 (MS004)	Wastewater Treatment Plant	1987	None
23 (MS005)	Maintenance Paint Spray Booth	1989	Filter
24 (BS001)	Body Welding (Numerous Individual Units)	1983	None
25 (MS006)	Natural Gas-Fired Boilers #2, #3 and #4 99.2 mmBtu/hr - Each	1964	None
26	Natural Gas-Fired Space Heaters 9 at 11 mmBtu/hr Each 2 at 15.1 mmBtu/hr Each	Various	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM, NO_x and HAP emissions.

5.2 Applicable Regulations

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

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

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

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

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

5.2.3 Ozone Depleting Substances

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 Risk Management Plan

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

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

5.2.5 Future Regulations

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow

alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

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

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 35 IAC Parts 218 or 219, because the source is not located in the Chicago or Metro-East metropolitan areas.

5.3.2 This stationary source does not have a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. See Conditions 7.1.4 and 7.2.4 for the reasons it does not apply.

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	2,895.13
Sulfur Dioxide (SO ₂)	1.88
Particulate Matter (PM)	191.05
Nitrogen Oxides (NO _x)	374.39
HAP, not included in VOM or PM	-----
Total	3,462.45

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

- a. The annual emissions from the source shall not exceed the following limitations:

Pollutant	Emissions (Tons/Year)	Underlying Rules
Volatile Organic Material	3,114	40 CFR 52.21

The limits above are limitations established in Permit 73021312, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. [T1].

- b. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the

current month plus the preceding 11 months (running 12 month total).

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 General Records for Fuel Combustion

- a. A record of the design capacity of each fuel combustion device.
- b. A record of aggregate natural gas consumed by all fuel combustion devices and afterburners (mmBtu or scf per month).

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

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

response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions (both VOM and PM type) from the source for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

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

- a. Relocation of or physical changes to equipment within the facility.
- b. Changes in the number and types of application equipment.
- c. Automating manual spraying operations and/or adding additional spray applicators.
- d. Changes in materials used in emission units.
- e. Extending oven lengths and widths, changing spray application equipment and rearranging spray application equipment.
- f. The use of new coatings.

- g. Reconstruction or replacement of air pollution control equipment with equivalent or more efficient equipment.
- h. The addition or deletion of solvent wiping operations within designated source areas as long as the addition or subtraction does not exceed the allowable under this Title V Application.

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

- a. Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each organic liquid times the VOM emissions contributed by that organic liquid is acceptable.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Coating Operations
Control: Afterburners and Wet Scrubber

7.1.1 Description

The word automobile when used in this permit also includes light duty trucks and sport utility vehicles (SUVs), which may or may not be produced at this source.

There are several types of coatings applied to automobiles. The prime coat is the initial coat applied to the body of the automobile by an electrocoat process which takes place inside a dip tank, that is the entire vehicle is submersed in a water-based coating and an electric charge applied. The Permittee has an afterburner (referred to as a regenerative thermal oxidizer or RTO) on the prime-coat-baking oven but the coating would be in compliance with the applicable regulations even without the RTO.

The particular automobiles being coated at this time use a guide coat or prime surfacer coat. This coating is called antichip that is applied to the exterior of the autobody to reduce chips in the coating from small stones being thrown up from the road. It is applied as a powder coat with minimum VOM emissions. There are filters for recovery of powder but they are not considered control equipment since the powder is recycled back into the process.

The top coat consists of a waterborne base coat and a solvent borne clear coat, but the base coat is not baked before applying the clear coat but is flash dried. While there is only one line of automobiles through the prime coat and antichip coating operations, the line divides into two for the top-coat operation. Each top-coat booth has its own wet scrubber but are ducted to a single RTO.

The reprocess booth is where defects in the topcoat are repaired before assembly of parts to the automobile begins. The reprocess booth is similar to the topcoat booths in that it has a flash dry for basecoat and a bake oven after clear coat application.

If a repair has to be done after final assembly, it is done in a "low bake" process that uses electric heat lamps to cure the paint. Normal high temperature ovens would destroy plastic, rubber and electronic components of the assembled automobile.

Autos with defects in the coating after the initial coating process may have a small part recoated or an

entire section or whole auto sanded down and recoated in a reprocess spray booth and oven.

Non-automobile parts that are used to prop open hoods, lids and doors get coated with paint from repeated use. They will have the coating removed by a fluidized bed cleaner which has an internal afterburner.

Waste paint sludge from the wet scrubbers of the booths is dried and the fumes from the drier are vented to an afterburner.

There are other specialty coatings applied. These include a blackout coating and sound deadener coating. The blackout paint for the wheel wells is applied after the topcoat. The sound deadener coating is applied to the underside and wheel wells of the vehicle after top coating also. These coatings contain low amounts of VOM and since applied to a small area only a slight amount of PM is generated and filters are used as control devices.

These are both state emission standards (35 IAC) and federal NSPS (40 CFR 60) for automobile coating. Each standard has a different method for measuring compliance. The state standard is in pounds of VOM emitted per gallon of coating used. The gallon is measured as if there were no water present (if water is present in the coating). Credit may be taken for control equipment, i.e., the afterburner.

Compliance with the NSPS is determined as pounds of VOM emitted per gallon of applied coating solids. When measured this way, coatings in which a high percent of the coating actually adheres to the auto body (i.e., less overspray, usually measured by a factor called transfer efficiency) may contain more VOM and still comply. Credit may also be taken for control equipment. Prime coats have low emissions standards because the solvent is primarily water and since it is applied in a dip tank the transfer efficiency is essentially 100%.

The solvent purge is a process associated with the top coating, the one actually seen by the automobile purchaser. The same spray head is used for each color and thus when a color change is made the coating in the spray head must be purged with a solvent to clean out the old color. Even if the color is not changed the spray head is purged as needed but on average every 10 to 15 vehicles. This is because as the coating accumulates at the spray head discharge point it will come out as a glob if not cleaned with a purge. These paint globs are imperfections in the paint finish that would require additional sanding and painting to remove. There is no specific emission

standard for this type of process, but permit condition specifies work practices to minimize emissions.

For PM control the terms filters, dust collectors and baghouse are all devices for removing PM by passing through a filter media.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description ^a	Emission Control Equipment
1 (PS001)	Prime Coat: Electrocoat Dip Tank and Electrocoat Oven Electrocoat Oven Firing Rate (All Zones Combined): 17.9 mmBtu/hr	Regenerative Thermal Oxidizer (RTO) on Bake Oven Only E-Coat RTO Firing Rate: 8 mmBtu/hr
2 (PS002)	Three Zone Powder Antichip Coating with Powder Recycling and Three Zone Bake Ovens Bake Oven Firing Rate (All Stages Combined): 61.64 mmBtu/hr	None
3 (PS002)	Dry Sanding Booth after Antichip Curing	Baghouse (CT-PS-018)
4 (PS003)	Top Coat Lines North and South: Each Line has Automatic and Manual Spray Stations and 5-Zone Bake Oven Bake Oven Firing Rate: (All Stages from Both Lines Combined): 26.8 mmBtu/hr	Wet Scrubber on Each Spray Booth (CT-PS-022 and 024). RTO on Zone 1 of Bake Ovens Topcoat RTO Firing Rate: 10 mmBtu/hr
5	Reprocess Sanding Booth	Dust Collector (CT-PS-018)
6 (PS003)	Top Coat Reprocess Spray Booth with Automatic and Manual Spray Stations and Four Zone Bake Ovens Bake Oven Firing Rate: 10.5 mmBtu/hr	Wet Scrubber on Spray Booth, Topcoat RTO on Zone 1 of Bake Oven
7 (TA002)	Low Bake Topcoat Repair Line	Filters (CT-AT)
8 (PS004)	Underbody Blackout (Air Dry) and Solvent Wipe Spray Booth	Filters (CT-PS-025)

Emission Unit	Description ^a	Emission Control Equipment
9 (TA001)	Underbody Sound Deadener Spray Booth	Filters
10	Paint Sludge Dryer with Afterburner	None
11	Solvent Purge	None
12	Fluidized Bed Tool Cleaner with Internal Afterburner	None

^a There are VOM emissions during circulation and distribution of coatings, but the VOM content is on an "as received" basis and VOM losses during mixing are thus accounted for in the emission calculations.

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected coating lines" for the purpose of these unit-specific conditions, are coating lines used to coat automobiles/light duty trucks/SUVs and identified in Condition 7.1.2.
- b. Each affected coating line is subject to the emission limits identified in Condition 5.2.2.
- c. Each coating line is subject to an NSPS, 40 CFR 60 Subpart MM, for automobile and light duty truck surface coating operations. The specific standards are as follows:
 - i. Prime Coat: 1.33 lb VOM/gal of applied coating solids (0.16 kg VOM/liter of applied coating solids).
 - ii. Guide Coat: 11.67 lb VOM/gal of applied coating solids (1.4 kg VOM/liter of applied coating solids).
 - iii. Top Coat: 12.26 lb VOM/gal of applied coating solids (1.47 kg VOM/liter of applied coating solids.)

Top coat repair coating in the reprocess booth and oven and dilution solvents must be included in the top coat calculation.

- d. Each coating line is subject to 35 IAC 215.204(a) (1). These standards are measured as pounds of VOM emitted per gallon of coating excluding water.

		<u>lb/gal</u>	<u>kg/liter</u>
i.	Prime Coat	1.2	0.14
ii.	Prime Surface Coat ^a	2.8	0.34
iii.	Top Coat ^b	2.8	0.34
iv.	Final Repair Coat	4.8	0.58

Final repair coat is for the low bake booth only and not reprocess booth. (See also Condition 7.1.5c).

^a See Compliance Procedures in Condition 7.1.12

^b See Compliance Procedures in Condition 7.1.12

e. Each coating operation is subject to 35 IAC 212.321. This rule limits PM emissions and is written out in Attachment 1. For coating operations the process weight is the weight of the coating only.

f. The bake ovens used on several of the coating lines identified in Condition 7.1.2 are classified as fuel combustion emission units and are subject to 35 IAC 216.121 which limits CO emissions to 200 ppm, corrected to 50 percent excess air. This applies to units with a heat input greater than 10 mmBtu/hr.

g. Malfunction and Breakdown Provisions

Since neither the afterburner on the prime coat line or the top coat lines is required to comply with Condition 7.1.3(c)(i) or (d), in the event of malfunction or breakdown of the afterburner, the coating line is not required to be shut down.

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected air heaters which heat the air used in the bake ovens not being subject to 40 CFR Part 60, Subpart Dc, standards for small industrial steam generating units because the air heaters were constructed prior to the applicability date of June 9, 1989. Note that they are included in the definition of steam generating units because the definition applies to heating any heat transfer medium, not just turning water into steam.

b. This permit is issued based on the affected air heaters which heat the air used in the bake ovens not being subject to 35 IAC 217.121 because the heat input for each unit is less than 250 mmBtu/hr.

- c. This permit is issued based on the affected coating operations not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected units do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Control and Operational Requirements

- a. When their use is required for compliance, the afterburners on the uni-prime and the topcoat operations shall achieve no less than 70% and 10% overall control of volatile organic material emissions, respectively, considering both capture and destruction. This shall include maintenance of 1350°F in the following afterburner combustion chambers: reprocess, three uni-prime and two topcoat.
- b. Coating usage from particular operations shall not exceed the amounts as specified in the Table below. Compliance with these limits shall be determined from a running total of 12 months of data. [T1]

<u>Operation</u>	<u>Applied Coating Solids (Gal/Yr)</u>
Uni-Prime	414,185
	<u>Total Coating (Gal/Yr)</u>
Topcoat (includes 2 topcoat booths and reprocess booth):	175,040
	<u>Total Coating (Gal/Yr)</u>
<u>Operation</u>	<u>(Gal/Yr)</u>
Low-Bake	4,935
Blackout	16,100

- c. The VOM content of coatings for the low-bake booth, which is an average of the basecoat and clearcoat, shall not exceed 4.8 lb/gal. [T1]
- d. The particulate matter emissions from coating overspray shall be controlled by waterwalls (wet scrubbers), filters or other devices as specified in Condition 7.1.2 so as to achieve compliance with Condition 7.1.3(e).

- e. Natural gas shall be the only fuel used in fuel combustion emission device and as supplemental fuel for the afterburners.

7.1.6 Emission Limitations

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

VOM emissions from coating operations shall not exceed the following:

<u>Operation</u>	VOM Emissions	
	<u>(Lb/Day)</u>	<u>(Ton/Yr)</u>
Electrocoat	1,890	
Topcoat: Basecoat and Clearcoat	6,215	
Reprocess	110	11.1
Blackout	27	

Heat input and emissions of NO_x from the ovens and afterburners shall not exceed the following:

<u>Operation</u>	Heat	NO _x
	<u>Input</u> <u>(mmBtu/Hr)</u>	<u>Emissions</u> <u>(Ton/Yr)</u>
Electrocoat Oven and RTO	65.9	17.9
Topcoat Ovens with RTO	89.9	20.3
Reprocess Oven	46.7	10.6
Paint Sludge Dryer w/ Afterburner	13.0	8.0

CO emissions from the paint sludge dryer with afterburner shall not exceed 2.0 tons/yr.

The above limitations were established in Permit 73021312, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.1.7 Testing Requirements

- a. Upon request by the Illinois EPA, any of the afterburners that are required to operate in order to comply with Condition 7.1.3 shall be tested to determine destruction efficiency and inlet VOM emission rate. The test methods shall be conducted,

documented and reported in accordance with the NSPS, 40 CFR 60.8, 60.393 and 60.396.

- b. Upon request by the Illinois EPA, the transfer efficiency of any of the booths shall be measured in order to verify an input value for determining compliance with emissions on an applied coating solids basis pursuant to the USEPA "Protocol for Determining the Daily VOC Emission Rate of Automobile and Light Duty Truck Topcoat Operations", EPA 450/3-88-018.
- c. Upon request by the Illinois EPA the Permittee shall conduct performance tests for PM emissions or control device efficiency in accordance with the appropriate test methods in 40 CFR 60 Appendix A.
- d. Each coating received from the supplier shall include an analysis of VOM content determined using USEPA Method 24 or 24A or from formulation information.

7.1.8 Monitoring Requirements

Each of the afterburners shall be equipped with a monitor to measure the combustion chamber temperature. (40 CFR 60.394)

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected coating process to demonstrate compliance with Conditions 5.5.1, 5.5.3, 7.1.5, 7.1.6, and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

- a. Afterburner combustion chamber temperature (a continuous record of when operating normally, and a log of when combustion chamber was operating below specified temperature and vehicles were being produced).
- b. Vehicles produced.
- c. VOM content of each coating received and solids content of all top coats.
- d. Records of the most recent emission tests performed including transfer efficiency tests.
- e. Any record required to demonstrate compliance with Condition 7.1.6.
- f. A monthly record of demonstration of compliance with the NSPS, Condition 7.1.3(c).

- g. VOM, PM, NO_x, and SO₂ emissions (lb or ton/mo and year).

7.1.10 Reporting Requirements

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

- a. Any exceedance of an NSPS limit.
- b. Operation of a coating line when the temperature in afterburner combustion chamber is not adequate to achieve required destruction efficiency.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

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

The actual coatings may be change (i.e., new colors) provided that emissions continue to comply with Condition 7.1.3, 7.1.5 and 7.1.6.

7.1.12 Compliance Procedures

- a. Compliance with the applicable regulations in Condition 7.1.3 and emission limitations in Condition 7.1.6 shall be based on operating within the requirements of Condition 7.1.5, monitoring the operation as required by Condition 7.1.8 and the recordkeeping and reporting requirements of Conditions 7.1.9 and 7.1.10 and the calculations to follow or other approved calculations using USEPA methodology.
- b. Prime Coat (Electrodeposition) Emission Calculations
 - i. Emissions VOM (lb/mo) = Resin usage (gal/mo) times VOM content of resin (lb VOM/gal) + Paste usage (gal/mo) times VOM content of paste (lb VOM/gal)

ii. Emission rate^a (lb/gal = (i) above divided by
of applied coating [Resin usage (gal/mo)
solids) times (% volume
solids/100) + Paste
usage (gal/mo) times
(% volume solids/100)]

^a This calculation may be done in metric units. They may also be done by a spreadsheet format based on the same principles.

Note that no credit for an emission reduction is given for the afterburner on the bake oven of the prime coat line.

c. Guide Coat Emission Calculations

i. Emissions VOM (lb/mo) = $\sum_{i=1}^n$ [Guide coat usage
(gal/mo) times VOM
content (lb/gal)] +
[Diluent solvent usage
(gal/mo) times diluent
density (lb/gal)]

Where n = Number of different coatings

ii. Applied coating solids = $\sum_{i=1}^n$ [Guide coat usage
(gal) (gal/mo) times (volume
% solids/100)] times
transfer efficiency
(%/100)

iii. Emission rate^a (lb/gal = (i) divided by (ii)
of applied coating above
solids)

^a This calculation may be done in metric units

iv. The USEPA's guidance for automobile coating lines, which underlies 35 IAC 215.204(a), established an emission standard for prime surfacer coat lines of 2.8 lb VOM/gal based on achievement of a transfer efficiency of 30 percent. This USEPA guidance further stated that prime surfacer containing more than 2.8 lb VOM/gal may be considered to be in compliance if the levels of transfer efficiency and add-on control, if any, are

such that the result is at least equivalent to use of a coating containing 2.8 lb VOM/gal applied at 30 percent transfer efficiency, i.e., 15.1 lb VOM/gal applied coating solids. This equivalent standard provides for appropriate consideration of the VOM content of the coating, the transfer efficiency with which it is applied, and the emission reduction provided by any add-on control equipment.

The standards set by the federal NSPS for automobile coating operations are also expressed in terms of lb VOM/gal applied coating solids (refer to Condition 7.1.3(c)). The NSPS standard for guide coat (prime surfacer coat) operations, 11.67 lb VOM/gal applied solids, is significantly more stringent than the applicable state standard for prime surfacer coat (guide coat), when appropriately expressed in terms of applied solids. Accordingly, compliance with the NSPS limit using "real transfer efficiency", as required by Condition 7.1.5(b), rather than the higher table values of transfer efficiency as given in 40 CFR 60.393(c)(1)(i)(C) is considered to be sufficient to demonstrate compliance with the state standard for prime surfacer coat.

The USEPA guidance was a memorandum by Richard G. Rhoads of the Office of Air Quality Planning and Standard Air Quality Planning and Standard dated October 6, 1978 and considered to be a supplement to the original automobile coating control technology guideline. This was further supplemented in 1987 in a document on issues related to VOC regulation cut points, deficiencies and deviations, frequently referred to as the Blue Book.

d. Top Coat Emission Calculations

- i. This is a complex calculation generally done by spread sheet values and computer calculations involving the following variables:

Coating usage by color, percent volume solids and VOM content, diluent solvent usage and density, repair coating usage, percent volume solids and VOM content, transfer efficiency for each type of base-coat and clear coat, amount of base coat and clear coat recovered

from purging procedures, percent of VOM carried through to the bake oven and bake oven afterburner destruction efficiency.

- ii. The USEPA's guidance for automobile coating lines, which underlies 35 IAC 215.204(a), established an emission standard for topcoat lines of 2.8 lb VOM/gal based on achievement of a transfer efficiency of 30 percent. This USEPA guidance further stated that topcoat containing more than 2.8 lb VOM/gal may be considered to be in compliance if the levels of transfer efficiency and add-on control, if any, are such that the result is at least equivalent to use of a coating containing 2.8 lb VOM/gal applied at 30 percent transfer efficiency, i.e., 15.1 lb VOM/gal applied coating solids. This equivalent standard provides for appropriate consideration of the VOM content of the coating, the transfer efficiency with which it is applied, and the emission reduction provided by any add-on control equipment.

The standards set by the federal NSPS for automobile coating operations are also expressed in terms of lb VOM/gal applied coating solids (refer to Condition 7.1.3(c)). The NSPS standard for topcoat operations, 12.26 lb VOM/gal applied solids, is significantly more stringent than the applicable state standard for topcoat, when appropriately expressed in terms of applied solids. Accordingly, compliance with the NSPS limit using "real transfer efficiency", as required by Condition 7.1.5(b), rather than the higher table values of transfer efficiency as given in 40 CFR 60.393(c)(1)(i)(C) is considered to be sufficient to demonstrate compliance with the state standard for topcoat.

The USEPA guidance was a memorandum by Richard G. Rhoads of the Office of Air Quality Planning and Standard Air Quality Planning and Standard dated October 6, 1978 and considered to be a supplement to the original automobile coating control technology guideline. This was further supplemented in 1987 in a document on issues related to VOC regulation cut points, deficiencies and deviations, frequently referred to as the Blue Book.

e. Other Uncontrolled Coatings

VOM Emissions (lb/mo) = Coating usage (gal/mo) times
VOM content (lb/gal)

7.2 Unit: Other Process Emission Units
Control: None

7.2.1 Description

This section covers emission units other than coating and fuel combustion. The emissions here are also primarily VOM as various solvents are used throughout the assembly process. Some solvents are for cleaning or wiping the automobile; another example is filling containers or tanks on the automobile with fluids that are VOMs. Window installation includes cleaning solvents and also solvents in the adhesives used.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
13 (TA004)	Plantwide Solvent Body Wiping	None
14 (TA005)	Miscellaneous Cleaners and Solvents	None
15 (TA006)	Front Window Installation	None
16 (TA007)	Rear Window Installation	None
17 (TA008)	Gasoline Fill Stations	None
18 (TA008)	Gasoline Storage Tanks	Vapor Balance
19 (TA009)	Antifreeze Fill Stations	None
20 (TA010)	Windshield Washer Fill Station	None
21 (SP001)	Stamping Washers	None
22 (MS004)	Wastewater Treatment Plant	None
23 (MS005)	Maintenance Paint Spray Booth	Filter
24 (BS001)	Body Welding (Numerous Individual Units)	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected other emission unit" for the purpose of these unit-specific conditions, is an operation employed during assembly of an automobile and identified in Section 7.2.2 or for treating wastewater created during such assembly.

- b. Each affected other emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. Emission units 13 to 22 are subject to 35 IAC 215.301. This rule limits VOM emissions to 8 lb/hr, if photochemically reactive pursuant to the definition in 35 IAC 211.4690, or 85% as allowed by § 215.302. Since there is no control equipment, emissions must be below 8 lb/hr. Note that each unit identified in Condition 7.2.2 may include more than one emission unit as listed, regulated by § 215.301. Solvent used for one operation along the assembly line would be one unit and solvent used somewhere else along the assembly line would be another unit.
- d. An "affected tank", for the purpose of these unit-specific conditions, is a storage tank that is only subject to 35 IAC 215.122(b). The affected gasoline storage tank is subject to the requirements of 35 IAC 215.122(b) because the tank has a capacity greater than 250 gallons and is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- e. The welders are subject to 35 IAC 212.321. Typically, the allowable PM would be determined by a varying process weight rate. The process weight rate for a welding operation is determined by the weight of the welding rods only and not the weight of the steel. For any process weight rate under 100 lb/hr, the allowable is 0.55 lb/hr. This is the case for this operation.

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected units do not use an add-on control device to achieve compliance with an emission limitation or standard, uses a passive control measure, such as a submerged loading pipe, that is not considered a control device because it acts to prevent the release of pollutants, or uses a passive control measure, such as low vapor pressure solvents, that is not considered a control device because it acts to prevent the pollutants from forming.

7.2.5 Operational Requirements

- a. The organic material emissions from the gasoline storage tanks, including any tanks classified as insignificant emission units shall be controlled by use of a "Stage 1" vapor balance system. Vehicle

fueling shall be controlled by use of an On-Board Refueling and Vapor Recovery (ORVR) or "State 2" balance system.

- b. Each affected gasoline storage tank shall be equipped and operated with a permanent submerged loading pipe, pursuant to 35 IAC 215.122(b). (The Illinois EPA has not approved use of other equivalent equipment in lieu of a permanent submerged loading pipe.)

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected stamping washers are subject to the following:

	VOM Emissions	
<u>(Lb/Day)</u>		<u>(Ton/Yr)</u>
516		94.2

The above limitation was established in Permit 73021312, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.2.7 Testing Requirements

None

7.2.8 Inspection and Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected unit to demonstrate compliance with Conditions 5.5.1 and 7.2.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Design information for the tank showing the presence of a permanent submerged loading pipe;
- b. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe;

- c. Monthly usage of solvents on each process listed in Condition 7.2.2 or throughput of gasoline for the storage tank or vehicle fueling. Solvents will be assumed to be 100% VOM unless a record indicating otherwise is kept. The HAP content of the material will also be kept in accordance with the 1992 USEPA survey as listed in Condition 5.9.1(b);
- d. Lubricant usage, VOM content, and VOM emissions. Compliance with the daily usage limit specified in Condition 7.1.6 may be calculated from a monthly records;
- e. If credit is claimed for materials returned for recycling, then records of the usage and VOM content of the recycled materials shall be kept; and
- f. VOM and HAP emissions from each emission unit. If the unit is subject to Condition 7.2.3(c), the material is photochemically reactive, and the emission rate exceeds 8 lb/hr then any records that indicate the unit consisted of more than one operation, each of which could be claimed as a unit, shall be kept (lb or ton/mo and year).

7.2.10 Reporting Requirements

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

- a. Any storage of VOL in an affected gasoline storage tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.2.5, e.g., no "permanent submerged loading pipe", or not employing a vapor balance system during loading within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
- b. Any storage of VOL in an affected gasoline storage tank that is out of compliance with the control requirements (Condition 7.2.5(b)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-

compliance, and the steps to be taken to avoid future non-compliance.

- c. Usage of VOM emissions exceeding the allowable in Condition 7.2.6.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

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

The solvents or cleaning agents used in equipment listed in Condition 7.2.2 may be changed provided the unit continues to comply with Conditions 7.2.3(c), 7.2.5 and 7.2.6.

7.2.12 Compliance Procedures

- a. Compliance with Conditions 7.2.3, 7.2.5 and 7.2.6 shall be determined from the recordkeeping requirements of Condition 7.2.9 and the reporting requirements of Condition 7.2.10.
- b. For all emission units except the gasoline tank and vehicle fueling, all solvent used, less any amount recycled, will be assumed to be emitted.

7.3 Natural Gas-Fired Boilers and Space Heaters

7.3.1 Description

Three natural gas-fired boilers are being operated. All three boilers are just below 100 mmBtu/hr.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
25 (MS006)	Natural Gas-Fired Boilers #2, #3 and #4 99.2 mmBtu/hr - Each	None
26	Natural Gas-Fired Space Heaters 9 at 11 mmBtu/hr each 2 at 15.1 mmBtu/hr each	None

7.3.3 Applicability Provisions and Applicable Regulations

- a.
 - i. An "affected boiler or space heater" for the purpose of these unit-specific conditions, is each boiler listed in Condition 7.3.2.
 - ii. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any boiler or space heater identified in Condition 7.3.2 to exceed 200 ppm, corrected to 50 percent excess air on a per boiler basis [35 IAC 216.121].

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected boilers and greater than 10 mmBtu/hr space heaters are not subject to NSPS, 40 CFR 60 Subpart D, Small Industrial-Commercial-Institutional Steam Generating Units, since each steam generating unit was constructed, modified, or reconstructed prior to June 9, 1989 which is the applicability date. The 15.1 mmBtu/hr space heaters were constructed after June 9, 1989 but are not capable of firing oil. See Condition 7.3.9 for recordkeeping requirements.
- b. The affected boilers are not subject to 35 IAC 217.141, Existing Emission Sources in Major Metropolitan Areas, since the actual heat input of the boilers is less than 73.2 MW (250 mmBtu/hr).
- c. The affected boilers are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC

218.303, Fuel Combustion Emission Sources, which excludes the affected boilers from this requirement.

7.3.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected boilers.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the boilers are subject to the following:

N/A

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

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

- a. Source fuel usage (ft³/yr) based upon monthly fuel usage records; and
- b. Fuel combustion emissions calculated in accordance with the procedures given in Condition 7.3.12 (ton/yr); and
- c. A record showing that no oil was burned in the 15.1 mmBtu/hr space heaters.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected boiler with the permit requirements within 30 days of discovery and determination that a deviation has occurred, 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(b) is assumed to be achieved by the work practices inherent in operation of a natural gas-fired boiler, thus no compliance procedures are set in this permit addressing this regulation.
- b. To determine compliance with Condition 5.5.1 emissions from the natural gas fired equipment shall be based on the emission factors listed below:

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

These are the emission factors for uncontrolled natural gas combustion in boilers, Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement D, September 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, ft³) x
(The Appropriate Emission Factor)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after October 2, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. 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:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. 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;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

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

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

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

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; 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 authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

Normally, an act of God such as lightning or flood is considered an emergency;

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7) (i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Allowable Emissions of Particulate Matter

Process Emission Units for Which Construction or Modification Commenced on or After April 14, 1972 [35 IAC 212.321(b)].

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 the following equation:

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

Where:

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

- a. For process weight rate up to 450 ton/hour:

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

- b. For a process weight rate under 100 lb/hr (0.05 ton), the allowable is 0.55 lb/hr.

10.2 Attachment 2 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 - Guidance on Revising This Permit

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

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

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

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
 - Do not violate any applicable requirement;
 - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

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

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

Summary Of Application Contents

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

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

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature: BY: _____ <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center; width: 45%;"> _____ <small>AUTHORIZED SIGNATURE</small> </div> <div style="text-align: center; width: 45%;"> _____ <small>TITLE OF SIGNATORY</small> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center; width: 45%;"> _____ <small>TYPED OR PRINTED NAME OF SIGNATORY</small> </div> <div style="text-align: center; width: 45%;"> _____ / _____ / _____ <small>DATE</small> </div> </div>

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

10.5 Attachment 5 - Guidance on Renewing This Permit

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

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

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT,

as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

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

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

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

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

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)

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P.O. Box 19506
Springfield, Illinois 62794-9506

MVH:psj