

Statement of Basis

for the DRAFT CAAPP Permit for:

Source Name:

Midwest Metal Coating LLC

Statement of Basis No.: 00050028-1208

I.D. No.: 119040ATC

Permit No.: 00050028

Date Prepared: 6/26/13

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

This Statement of Basis is being provided to USEPA and any interested parties as required by Section 39.5(8)(b) of the Illinois Environmental Protection Act.

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PREFACE

Reason For This Document

This document is a requirement of the permitting authority in accordance with 502(a) of the Clean Air Act, 40 CFR 70.7(a)(5), and Section 39.5(8)(b) of the Illinois Environmental Protection Act. Section 39.5(8)(b) of the Illinois Environmental Protection Act states the following:

"The Agency shall prepare a statement that sets forth the legal and factual basis for the Draft CAAPP permit conditions, including references to the applicable statutory or regulatory provisions."

Purpose Of This Document

The purpose of this Statement of Basis is to provide discussion regarding the development of this Draft CAAPP Permit. This document would also provide the permitting authority, the public, the source, and the USEPA with the applicability and technical matters that form the basis of the Draft CAAPP Permit.

Summary Of Historical Actions Leading Up To Today's Permitting Action

Since the last Renewal CAAPP Permit issued on November 26, 2003, the source has not been issued any modifications or amendments.

Limitations

This Statement of Basis is not enforceable and only sets forth the legal and factual basis for the Draft CAAPP Permit Conditions (Chapters I and II). Chapter III contains supplemental material that would assist in educating interested parties about this source and the Draft CAAPP Permit. The Statement of Basis does not shield the source from enforcement actions or its responsibility to comply with existing or future applicable regulations. Nor does the Statement of Basis constitute a defense to a violation of the Federal Clean Air Act or the Illinois Environmental Protection Act including implementing regulations.

This document does not purport to establish policy or guidance.

INTRODUCTION

The Clean Air Act Permit Program (CAAPP) is the operating permit program established in Illinois for major stationary sources as required by Title V of the federal Clean Air Act and Section 39.5 of the Illinois Environmental Protection Act. The Title V Permit Program (CAAPP) is the primary mechanism to apply the various air pollution control requirements established by the Clean Air Act to major sources, defined in accordance with Title V of the Clean Air Act. The Draft CAAPP Permit contains conditions identifying the state and federal applicable requirements that apply to the source. The Draft CAAPP Permit also establishes the necessary monitoring and compliance demonstrations. The source must implement this monitoring to demonstrate that the source is operating in accordance with the applicable requirements of the permit. The Draft CAAPP Permit identifies all applicable requirements for the various emission units as well as establishes detailed provisions for testing, monitoring, recordkeeping, and reporting to demonstrate compliance with the Clean Air Act. Further explanations of the specific provisions of the Draft CAAPP Permit are contained in the following Chapters of this Statement of Basis.

The Illinois EPA has focused in on key elements of the permit that relate to the requirements of the CAAPP Program:

- Emissions of:
 - PM₁₀
 - NO_x
 - VOM
 - CO

- Emission units:
 - CS (Coating line)
 - CC/IRO (Chemical coater/infrared oven)
 - PB (Paint booth)
 - SB-1 and SB-2 (Shot blasters)
 - B1 (Natural gas fired boiler)

In addition, the Illinois EPA has committed substantial resources and effort in the development of an acceptable Statement of Basis (this document) that would meet the expectations of USEPA, Region 5. As a result, this document contains discussions that address applicability determinations, periodic monitoring, streamlining, prompt reporting, and SSM authorizations (as necessary). These discussions involve, where necessary, a brief description and justification for the resulting conditions and terms in this Draft CAAPP Permit. This document begins by discussing the legal basis for the contents of the Draft CAAPP Permit, moves into the factual description of the permit, and ends with supplemental information that has been provided to further assist with the understanding of the background and genesis of the permit content.

It is Illinois EPA's preliminary determination that this source's Permit Application meets the standards for issuance of a "Final" CAAPP Permit as stipulated in Section 39.5(10)(a) of the Illinois Environmental Protection Act (see Chapter I - Section 1.2 of this document). The Illinois EPA is therefore initiating the necessary procedural requirements to issue a Final CAAPP Permit. The Illinois EPA has posted the Draft CAAPP permit and this Statement of Basis on USEPA website:

<http://www.epa.gov/reg5oair/permits/ilonline.html>

CHAPTER I - LEGAL BASIS FOR THE PERMIT AND PERMIT CONDITIONS

1.1 Legal Basis for Program

The Illinois EPA's state operating permit program for major sources established to meet the requirements of 40 CFR Part 70 are found at Section 39.5 of the Illinois Environmental Protection Act [415 ILCS 5/39.5]. The program is called the Clean Air Act Permitting Program (CAAPP). The underlying statutory authority is found in the Illinois Environmental Protection Act at 415 ILCS 5/39.5. The CAAPP was given final full approval by USEPA on December 4, 2001 (see 66 FR 62946).

1.2 Legal Basis for Issuance of CAAPP Permit

In accordance with Section 39.5(10)(a) of the Illinois Environmental Protection Act, the Illinois EPA may only issue a CAAPP Permit if all of the following standards for issuance have been met:

- The applicant has submitted a complete and certified application for a permit, permit modification, or permit renewal consistent with Sections 39.5(5) and (14) of the Illinois Environmental Protection Act, as applicable, and applicable regulations (Section a. below);
- The applicant has submitted with its complete application an approvable compliance plan, including a schedule for achieving compliance, consistent with Section 39.5(5) of the Illinois Environmental Protection Act and applicable regulations (Section b. below);
- The applicant has timely paid the fees required pursuant to Section 39.5(18) of the Illinois Environmental Protection Act and applicable regulations (Section c. below); and
- The applicant has provided any additional information as requested by the Illinois EPA (Section d. below).

a. Application Status

The source submitted an application for a Renewal CAAPP Permit on March 3, 2008. The source is currently operating under an application shield resultant from a timely and complete renewal application submittal. This Draft CAAPP Permit addresses application content and necessary revisions to meet the requirements for issuance of the permit.

b. Present Compliance Status

At the time of this Draft CAAPP Permit, there were no pending State or Federal enforcement actions against the source; therefore, a Compliance Schedule is not required for this source. The source submitted an approvable Compliance Plan as part of its Certified Permit Application. The source has certified compliance with all applicable rules and regulations. In addition, the draft permit requires the source to certify its compliance status on an annual basis. See Section 3.5 for historical compliance.

c. Payment of Fees

The source is current on payment of all fees associated with operation of the emission units.

d. Additional Information

The source was not required to submit any additional application material.

1.3 Legal Basis for Conditions in the CAAPP Permit

This industrial source is subject to a variety of Federal and SIP regulations, which are the legal basis for the conditions in this permit (see Sections a. and b. below). Also, the CAAPP provides the legal basis for additional requirements such as periodic monitoring, reporting, and recordkeeping. The following list summarizes those regulations that form the legal basis for the conditions in this Draft CAAPP Permit and are provided in the permit itself as the origin and authority.

a. Applicable Federal Regulations

This source operates emission units that are subject to the following Federal regulations.

- 40 CFR Part 60 - Subpart A, General Provisions
- 40 CFR Part 60 - Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- 40 CFR Part 60 - Subpart TT, Standards of Performance for Metal Coil Surface Coating
- 40 CFR Part 63 - Subpart SSSS, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil
- 40 CFR Part 63 - Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

b. Applicable SIP Regulations

This source operates emission units that are subject to the following SIP regulations:

- 35 IAC Part 201 - Permits And General Provisions
- 35 IAC Part 212 - Visible And Particulate Matter Emissions
- 35 IAC Part 216 - Carbon Monoxide Emissions
- 35 IAC Part 217 - Nitrogen Oxides Emissions
- 35 IAC Part 219 - Organic Material Emis Stnds And Lmtns For The Metro East Area
- 35 IAC Part 254 - Annual Emissions Report

c. Other Applicable Requirements

The Illinois EPA promulgated new NO_x RACT rules, which are required to be addressed as well in this permit. However, these rules have not yet been SIP approved by the USEPA and, as such, have been incorporated into this permit as a State Only Requirement at this time.

CHAPTER II - FACTUAL BASIS FOR THE PERMIT AND PERMIT CONDITIONS

2.1 Source History

There is no significant source history warranting discussion for this source.

2.2 Description of Source

SIC Code: 3479
County: Madison

The source operates a coil coating line facility. The main emission unit is a continuous coil coating line designed to coat a 48" maximum wide coil of metal at a maximum line speed of 300 feet per minute. The type of coated metal produced on this line is referred to as purlin and girt stock. Purlins are used to provide structural support to roofs of pre-engineering metal buildings. Girts are used to provide structural support to the end walls of pre-engineered metal buildings. The exterior building sheets are secured to the purlins and girts. After the metal strip is cleaned and chemically treated, it can now be coated. The treatment is with an aqueous solution. The painting process consists of applying a volatile organic material paint to the metal substrate in a painting booth. In addition, the source also has two shot blasters and a 25.11 mmBtu/hr boiler used for plant heating. The boiler is not equipped with any emission control equipment and is exclusively fueled by natural gas.

The source contains the following processes:

<i>Emission Units</i>	<i>Description</i>
CS	Continuous Coil Coating Line with afterburner
CC/IRO	Continuous Coil Coating Line-Chemical Coater/Infrared Oven
PB	Paint Booth with overspray filter
SB-1	Shot Blaster #1 with Dust Collector #1
SB-2	Shot Blaster #2 with Dust Collector #2
B1	25.1 mmBtu/hr boiler

2.3 Single Source Status

This source does not have any collocated facilities that would be considered a single source with this facility based on information found in the certified application.

2.4 Ambient Air Quality Status for the Area

The source is located in an area that is currently designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment) and/or PM_{2.5} and attainment or unclassifiable for all other criteria pollutants (carbon monoxide, lead, nitrogen dioxide, PM₁₀, sulfur dioxide). (See 40 CFR Part 81 - Designation of Areas for Air Quality Planning Purposes)

2.5 Source Status

The source requires a CAAPP permit because this source is considered major (based on its PTE) for the following regulated pollutants: PM₁₀, PM_{2.5}, and volatile organic material (VOM).

The source also requires a CAAPP Permit because the source is subject to a standard, limitation, or other requirement under Section 111 (NSPS) or Section 112 (HAPs) of the CAA for which USEPA requires a CAAPP Permit, or because the source is in a source category designated by the USEPA. Specifically, this source is subject to 40 CFR 60 Subpart TT, Standards of Performance for Metal Coil Surface Coating.

This source maintains synthetic minor limits (see Condition 3.4(a)) for the following regulated pollutants: hazardous air pollutant (HAP).

This source is considered a natural minor for the following regulated pollutants: nitrogen oxides (NO_x), carbon monoxide (CO) and/or sulfur dioxide (SO₂).

Based on available data, this source is not a major source of emissions for GHG. Midwest Metal Coatings LLC voluntarily submitted data on its emissions of GHG in its 2011 AER, reporting actual annual emissions of GHG of 3776.37 tons per year. The emissions consist of 3776.23 tons of CO₂, 0.07 tons of N₂O, and 0.07 tons of methane.

This source is not currently subject to any "applicable requirements," as defined by Section 39.5(1) of the Act, for emissions of greenhouse gases (GHG) as defined by 40 CFR 86.1818-12(a), as referenced by 40 CFR 52.21(b)(49)(i). There are no GHG-related requirements under the Illinois Environmental Protection Act, Illinois' State Implementation Plan, or the Clean Air Act that apply to this facility, including terms or conditions in a Construction Permit addressing emissions of GHG or BACT for emissions of GHG from a major project at this facility under the PSD rules. In particular, the USEPA's Mandatory Reporting Rule for GHG emissions, 40 CFR Part 98, does not constitute an "applicable requirement" because it was adopted under the authority of Sections 114(a)(1) and 208 of the Clean Air Act. This permit also does not relieve the Permittee from the legal obligation to comply with the relevant provisions of the Mandatory Reporting Rule for this facility.

2.6 Annual Emissions

The following table lists annual emissions (tons) of criteria pollutants for this source, as reported in the Annual Emission Reports (AER) sent to the Illinois EPA:

<i>Pollutant</i>	<i>2011</i>	<i>2010</i>	<i>2009</i>	<i>2008</i>	<i>2007</i>
CO	2.64	2.28	0.05	2.16	2.20
NOx	3.15	2.72	1.73	2.57	2.62
PM	1.50	1.47	0.13	1.52	1.48
SO ₂	0.02	0.02	0.01	0.02	0.06
VOM	2.46	3.02	2.31	3.98	4.38
CO _{2E}	3,776.00	3,264.00	2,076.00	3,080.00	3,141.00
HAP 78591 (top)	0.09	0.22	0.05	0.02	0.03

2.7 Fee Schedule

The following table lists the approved annual fee schedule (tons) submitted in the Source's permit application:

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	97.71
Sulfur Dioxide	(SO ₂)	0.19
Particulate Matter	(PM)	20.22
Nitrogen Oxides	(NO _x)	30.81
HAP, not included in VOM or	(HAP)	-
Total		148.93

2.8 SIP Permit Facts (T1 Limits)

CAAPP Permits must address all "applicable requirements," which includes the terms and conditions of preconstruction permits issued under regulations approved by USEPA in accordance with Title I of the CAA (See definition of applicable requirements in Section 39.5(1) of the Illinois Environmental Protection Act). Preconstruction permits, commonly referred to in Illinois as Construction Permits, derive from the New Source Review ("NSR") permit programs required by Title I of the CAA. These programs include the two major NSR permit programs: (1) the Prevention of Significant Deterioration ("PSD") program¹ and (2) the nonattainment NSR program.² These programs also encompass state construction permit programs for projects that are not major.

In the CAAPP or Illinois's Title V permit program, the Illinois EPA's practice is to identify requirements that are carried over from an earlier Title I permit into a New or Renewed CAAPP Permit as "TI" conditions (i.e., Title I conditions). Title I Conditions that are revised as part of their incorporation into a CAAPP Permit are further designated as "TIR". Title I Conditions that are newly established through a CAAPP Permit are designated as "TIN". It is important that Title I Conditions be identified in a CAAPP Permit because these conditions will not expire when the CAAPP Permit expires. Because the underlying authority for Title I Conditions comes from Title I of the CAA and their initial establishment in Title I Permits, the effectiveness of T1 Conditions derives from Title I of the CAA rather than being linked to Title V of the A. For "changes" to be made to Title I Conditions, they must either cease to be applicable based on obvious circumstances, e.g., the subject emission unit is permanently shut down, or appropriate Title I procedures must be followed to change the conditions.

- Previously Incorporated Construction Permits:

<i>Permit No.</i>	<i>Date Issued</i>	<i>Subject</i>
97070099	December 4, 2000	Construct a Coil Coating Facility for the Coating of Purlin and Girt Stock
03030011	March 18, 2003	Modification of the coil coating line to allow intermittent use of the afterburner, during times when compliant coatings are used.
03090010	October 28, 2003	Modification of the coil coating line emission limits.

- The Illinois EPA has not recently issued Construction Permits for this source.
- There are no newly issued Construction Permits for projects not yet constructed for this source.

- The following table lists the T1N Limit issued by the Illinois EPA and require incorporation into the CAAPP Permit prior to the proposal and issuance of this Draft CAAPP Permit.

<i>T1 Type</i>	<i>Condition</i>	<i>Subject</i>
T1N	Section 3 Condition 3.4(a)	Limit to maintain status as an area source for HAPs

- Extraneous or Obsolete T1 Conditions:³

<i>Construction Permit No.</i>	<i>Condition Number</i>	<i>Subject</i>
97070099	2c, 9b	Construct a Coil Coating Facility for the Coating of Purlin and Girt Stock
03030011	3	Coil Coating Line Modification
03090010	2a	Coil Coating Line Modification

Reason: Conditions 2c and 9b in Construction Permit #97070099, Condition 3 in Construction Permit #03030011, and Condition 2a in Construction Permit #03090010 are superseded by the T1 Condition 4.1.2(c)(i)(C) in the CAAPP Permit. These Construction Permit conditions are revised through previous CAAPP Permit (issued 11/26/2003) Condition 7.1.6 [T1R].

CHAPTER III - SUPPLEMENTAL DISCUSSIONS REGARDING THE PERMIT

The information provided in this Chapter of the Statement of Basis is being provided to assist interested parties in understanding what additional information may have been relied on to support this draft CAAPP permit.

3.1 Environmental Justice Discussions

This location has not been identified as a potential concern for Environmental Justice consideration.

3.2 Emission Testing Results

The source has performed the following emission testing:

<i>Emission Unit</i>	<i>Date</i>	<i>Pollutant</i>	<i>Results of Run #1</i>	<i>Results of Run #2</i>	<i>Results of Run #3</i>	<i>3-Run Average</i>	<i>Compliance Margin %</i>
Coil Coating Line	2/2/00	VOC	99.29%	99.41%	99.46%	99.39%	9.39%
Coil Coating Line	4/20/05	VOC	97.9%	97.3%	97.59%	97.6%	7.6%

Pursuant 35 IAC 219.207(a), listed in Permit Condition 4.1.2(c)(i)(B)(II), the control device must have a 90 percent efficiency.

3.3 Compliance Reports (Annual Certifications, Semiannual Monitoring, NESHAP, etc.)

A review of the source's compliance reports demonstrates the sources ability to comply with all applicable requirements.

3.4 Field Inspection Results

A review of the source's latest field inspection report dated 05/21/2007 demonstrates the source's ability to comply with all applicable requirements.

3.5 Historical Non-Compliance

In assessing historical non-compliance, the following is a summary of current violations notices sent to the source:

Trigger Date	Rule	Violation
8/13/2002	Permit # 97070099, Condition 2(b)	Afterburner not operated at 90% efficiency
8/13/2002	Permit # 97070099, Condition 5(d)(1)	Record not submitted within 30 days of occurrences
8/13/2002	Permit # 97070099, Condition 5(e)	Quarterly report not submitted for low temperature events

All violations have been resolved as of 2/21/2003.

3.6 Source Wide Justifications and Rationale

Applicable Requirements Summary		
Applicable Requirement	Type	Location
Fugitive Particulate Matter (35 IAC 212.301 and 35 IAC 212.314)	Applicable Standard	See the Permit, Condition 3.1(a)
HAP Requirement (39.5(7) of the Act)	Applicable Limit	See the Permit, Condition 3.4(a)

Particulate Matter Emission

- ✓ Monitoring as follows (Condition 3.1(a)(ii))
 - o If required, daily observations for a week for PM emissions.
- ✓ Recordkeeping as follows (Condition 3.1(a)(ii)):
 - o If required, records for the observations.
- ✓ Reporting as follows (Condition 3.1(a)(ii)):
 - o If required, reports for the observations.

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- There is a small likelihood of an exceedance.
- Source has not exhibited a history of non-compliance.
- Monitoring is consistent with other sources in this source category.

HAP Emissions

- ✓ Testing as follows (Condition 3.4(a)(ii)(C))
 - o Testing of all coatings if source exceeds 80% of major source threshold for HAPs (greater than 8 tons of a single HAP) or 20 tons of combined HAPs).
- ✓ Monitoring as follows (Conditions 3.4(a)(ii)(A) and (a)(ii)(B))
 - o Monitoring of amount of coating used.
 - o Monitoring of RTO.
- ✓ Recordkeeping as follows (Conditions 3.4(a)(ii)(D), (a)(ii)(E), (a)(ii)(F), and (a)(ii)(G)):
 - o Records for RTO.
 - o Records of testing, if required.
 - o Records of HAP formulation (i.e. MSDS sheets) for each coating.
 - o Records of emissions.

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- Presumed as the source is subject to CAM, as is the case for the coating line.
- There is a small likelihood of an exceedance.

- Source has not exhibited a history of non-compliance for this pollutant. See Section 3.5 of this Statement of Basis.
- The source has requested this synthetic minor limit to avoid 40 CFR 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollution for Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, before this rule is promulgated on January 31, 2016. Calculations for the past 7 years indicate only one occurrence where the source exceeded a limit of 5 tons/year of single HAP, and two occurrences 12.5 tons/year of combined HAP. These "exceedances" were very close 5 and 12.5 (less than 0.1 tons/year for any data source point that exceeded), and so did not exceed the 80% threshold of 8 tons/year single HAP and 20 tons/year combined HAP. Furthermore, the source is subject to 40 CFR 63 Subpart SSSS, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil, and falls under the "once in, always in" memorandum from the EPA for HAPs, since this rule was promulgated before they requested a synthetic minor limit. As such, they are subject to the periodic monitoring of HAPs for the emission unit primarily responsible for HAP emissions.
- The source shall keep records of formulations through either MSDS or other formulation sheets (i.e. Product Data Sheets, or PDS). The source has provided both the PDS and MSDS for sample coatings, as part of the public record. Typically, the highest HAP content range is used from any formulation sheets, if a range is provided. The PDS provides the actual content of the paint. The MSDS gives the individual component, and provides a range for each component. In this case, the source uses the mid-range for HAP calculations, since using the mid-range values makes the HAP content higher than the actual HAP content reported in the PDS. In addition, if the high range value is used, the VOC/HAP content exceeds the resin (solids) part of the paint, which is not possible. Permit Condition 3.4(a)(ii)(F) reflects the use of mid-range HAP content.

Non-Applicability Discussion

Complex source-wide non-applicability determinations were not made for this source.

Prompt Reporting Discussion

Prompt reporting of deviations for source wide emission units has been established as 30 days. See rationale in Chapter III Section 3.9.

3.7 Emission Unit Justifications and Rationale

a. Coating Lines		
Applicable Requirements Summary		
Applicable Requirement	Type	Location
Opacity Requirement (35 IAC 212.123)	Applicable Standard	See the Permit, Condition 4.1.2(a)
PM Requirement (35 IAC 212.321)	Applicable Standard	See the Permit, Condition 4.1.2(b)
VOM Requirement (40 CFR 60.462(a))	Applicable Limit	See the Permit, Condition 4.1.2(c)
VOM Requirement (35 IAC 219.204(d))	Applicable Standard	See the Permit, Condition 4.1.2(c)

Applicable Requirements Summary		
Applicable Requirement	Type	Location
VOM Requirement (35 IAC 219.207(a))	Applicable Standard	See the Permit, Condition 4.1.2(c)
VOM Requirement (Permit #097070099)	Applicable Limit	See the Permit, Condition 4.1.2(c)
VOM Requirement (Construction Permit #097070099, 03090010, and 35 IAC 207(b)(1))	Applicable Standard	See the Permit, Condition 4.1.2(c)
VOM Requirement (Construction Permit #03030011)	Applicable Standard	See the Permit, Condition 4.1.2(c)
HAP Requirement (40 CFR 63.5120(a)(2))	Applicable Limit	See the Permit, Condition 4.1.2(d)
HAP Requirement (40 CFR 63.5130(e))	Applicable Standard	See the Permit, Condition 4.1.2(d)
HAP Requirement (40 CFR 63.5120(b) and 63.5170(d))	Applicable Standard	See the Permit, Condition 4.1.2(d)
HAP Requirement (40 CFR 63.5140(b))	Applicable Standard	See the Permit, Condition 4.1.2(d)
Work Practice Requirement (40 CFR 60.11(d))	Applicable Work Practice	See the Permit, Condition 4.1.2(e)

Visible Emissions (i.e., Opacity)

- ✓ Monitoring as follows (Condition 4.1.2(a)(ii)(A))
 - o Annual Method 22 observations
 - o If required, Method 9 measurements

- ✓ Recordkeeping as follows (Conditions 4.1.2(a)(ii)(B) and (a)(ii)(C)):
 - o Records of each Method 22 observation
 - o If required, records of each Method 9 measurement

- ✓ Reporting as follows (Condition 4.1.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- There is a small likelihood of an exceedance.
- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- Any visible emissions can be easily observed by the human eye and can be accurately measured by qualified individuals using USEPA Method 9.
- Annual observations of opacity, including records of these observations, are sufficient to verify compliance with the 30% opacity limit for the coil coating lines.
- The likelihood of a violation is small because natural gas is exclusively used as the fuel source for the infrared oven and afterburner.

Particulate Matter Emission

- ✓ Recordkeeping as follows (Condition 4.1.2(b)(ii)(A)):
 - o Records of PM emissions from process weight requirements, including hours of operation, method used to determine PM with supporting calculations, monthly PM emissions in pounds and the annual emissions of PM in tons
- ✓ Reporting as follows (Condition 4.1.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- There is a small likelihood of an exceedance.
- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- Compliance with Process weight rule for PM emissions is easily determined by maintaining appropriate records.
- The likelihood of a violation is small because natural gas is exclusively used as the fuel source for the infrared oven and afterburner.

Organic Material Emission

- ✓ Monitoring as follows (Conditions 4.1.2(c)(ii)(A)):
 - o Calibrate, operate and maintain approved continuous monitoring device
 - o Monitoring of afterburner temperature with continuous monitoring device, including records of deviations greater than 3 hours
 - o Operation of afterburner during usage of noncompliant coating
 - o Operation of afterburner to achieve 90 percent efficiency of VOM control
- ✓ Testing as follows (Condition 4.1.2(c)(ii)(B)):
 - o Performance test every month according to 40 CFR 60.466
- ✓ Recordkeeping as follows (Condition 4.1.2(c)(ii)(D) through 4.1.2(c)(ii)(H)):
 - o Records of periods in excess of 3 hours when the afterburner remains more than 50°F below the compliance temperature. Compliance temperature is demonstrated by the most recent measurement of afterburner efficiency as required by 40 CFR 60.8
 - o Records of afterburner combustion temperature, operating time, maintenance log
 - o Record retention of capture efficiency protocol
 - o Records of calculated parameters, both with and without control, pursuant to 40 CFR 60.463(c)(4). This includes volume of solids applied, mass of VOC's used, volume-weighted average of total VOC's, overall reduction efficiency for capture and control device,

- o volume-weighted average of VOC emissions, and monthly emission limits
 - o Monthly records including ID number, usage, density, VOM and HAP content for each coating, thinner, and solvent, during controlled and uncontrolled environments
 - o Records of VOM emissions
 - o Records as specified for source's CAM plan.
- ✓ Reporting as follows (Condition 4.1.5(a), 4.1.5(b)(i) and 4.1.5(b)(ii)):
- o Prompt and timely reporting of deviations within 30 days of deviation occurrence and summarized with the Semi-Annual Monitoring Reports.
 - o Report every calendar quarter each instance in which the VOC emissions exceed the limit specified in 40 CFR 60.462.
 - o Report any incidents where afterburner temperature drops as defined in 40 CFR 60.464(c) and Permit Condition 4.1.2(c)(ii)(A)

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- Presumed by rule as the source is subject to a standard promulgated after Nov. 1990.
- Presumed as the source is subject to CAM.
- Monitoring is consistent with other sources in this source category.
- Afterburner is required for use of non-compliant coatings.
- Afterburner is required to be operational and routinely monitored to ensure efficiency is maintained.
- Testing of afterburner has demonstrated sufficient compliance margin.
- Periodic monitoring utilizes two separate options. First, the coating lines are subject to the VOM control requirements of 35 IAC 219, Subpart F: Coating Operations. Compliance with the requirements of this subpart is achieved through the use of compliance coating containing less than 1.7 lb of VOM per gallon of coating, as applied, pursuant to 35 IAC 219.204(d). Recordkeeping requirements for VOM content assure compliance with this option. Second, pursuant to Construction Permit #03030011, when the coating exceeds 1.7 lb VOM per gallon of coating, compliance is achieved through the use of capture system and control device that provides more than 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency in accordance with the requirements of 35 IAC 219.207(b)(1). The monitoring, testing, and recordkeeping for the afterburner used to control emissions assures compliance of VOM destruction when the source cannot achieve compliance through the coating option.

HAP Emissions

- ✓ Monitoring as follows (Condition 4.1.2(d)(ii)(A), 4.1.2(d)(ii)(B), 4.1.2(d)(ii)(C), 4.1.2(d)(ii)(D), 4.1.2(d)(ii)(E), and 4.1.2(d)(ii)(F))
- o Calibrate, operate and maintain approved continuous monitoring device.
 - o Develop a capture system monitoring plan and monitor capture system according to the plan.
 - o Calculate overall organic HAP control efficiency.
 - o Measure the mass of each coating material applied during the month.
 - o Calculate organic HAP emitted during the month.

- o Calculate organic HAP emission rate for the 12 month compliance period.
- ✓ Testing as follows (Condition 4.1.2(d)(ii)(G), 4.1.2(d)(ii)(H), 4.1.2(d)(ii)(I), and 4.1.2(d)(ii)(J)):
 - o Determine organic HAP content of each coating material applied during the month, using Method 24 of 40 CFR part 60. The determination by be performed by the manufacturer of the coating.
 - o Determine solids content of each coating material applied during the month, using ASTM-D2697-86 or ASTM D6093-97. This determination may be performed by the manufacturer of the coating.
 - o Establish operating limits for the combustion temperature of the oxidizer through data collected during a performance test.
 - o Determine capture efficiency according to testing protocols in Method 24A through F of 40 CFR 51, Appendix M.
- ✓ Recordkeeping as follows (Condition 4.1.2(d)(ii)(K) and 4.1.2(d)(ii)(L)):
 - o Records of when each compliance option is used, including the time periods each option is used.
 - o Records of control device and capture system operating data
 - o Records of HAP content data.
 - o Records of VOM and solids content data.
 - o Records of overall control efficiency determination, including capture efficiency tests and control device efficiency tests.
 - o Records of material usage, HAP usage, VOM usage, and solids usage.
 - o Records as specified by 40 CFR 63.10(b)(3).
 - o Records as specified for source's CAM plan.
- ✓ Reporting as follows (Condition 4.1.5(a) and 4.1.5(b)(iii)):
 - o Prompt and timely reporting of deviations within 30 days of deviation occurrence and summarized with the Semi-Annual Monitoring Reports.
 - o Submit additional reports pursuant to 40 CFR 53.5180(a), including performance tests notification and reports, compliance status notification and reports, start-up, shutdown, and malfunction reports, and deviation reports.

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- Presumed by rule as the source is subject to a standard promulgated after Nov. 1990.
- Presumed as the source is subject to CAM.
- The source has a substantial margin of compliance.
- Source has not exhibited a history of non-compliance for this pollutant. See Section 2.6 for Annual Emissions of HAP and Section 3.5 for Historical Non-Compliance.
- Monitoring is consistent with other sources in this source category.
- From Section 2.6, the source's HAP usage has not exceeded 1 ton per year of HAP since 2007. Despite being well under the threshold for HAP usage as a major emitter(10 tons per year individual HAP, and 25 tons per year total HAP), the Potential to Emit for HAPs for the source is considered major. The source could choose to agree to a minor limit, making them a synthetic minor. However, they would still be subject to the NESHAP. When the NESHAP, in this case 40 CFR 63 Subpart SSSS, was promulgated,

the source was considered major for HAPs. As determined by the EPA, the source is considered subject to this rule, regardless of whether the source is major or minor (or synthetic minor) for HAPs. Whether a facility needs to comply permanently with a MACT standard or not is determined by EPA's March 16, 1995, "Potential to Emit for MACT Standards- Guidance on Timing Issues", which is also known as the "Once In Always In" policy. This policy clarifies that facilities that are major sources of HAPs on the first compliance date of the standard are required to comply permanently with the MACT standard to ensure that maximum achievable reductions in toxic emissions are achieved and maintained. Furthermore, for following compliance with regards to 40 CFR 63, Subpart SSSS, the source is considered an always-controlled workstation, and not an intermittent-controlled workstation. By definition, pursuant to 40 CFR 63.5110, an always-controlled work station means a work station associated with a curing oven from which the curing oven exhaust is delivered to a control device with no provision for the oven exhaust to bypass the control device. Sampling lines for analyzers and relief valves needed for safety purposes are not considered bypass lines. Since the source does not have any means to bypass the control device, the coating line is considered always-controlled, and subject to the rules in 40 CFR 63 Subpart SSSS as an always-controlled workstation even if the source is using compliant coatings and the thermal oxidizer is not operating.

Non-Applicability Discussion

Complex non-applicability determinations were not made for this emission unit. All non-applicability discussions can be found in the Draft CAAPP Permit.

Prompt Reporting Discussion

Prompt reporting of deviations has been established as 30 days. See rationale in Chapter III Section 3.9.

In addition, the Permittee shall submit a report every quarter for every deviation of Permit Condition 4.1.2(c)(i)(A). The Permittee shall also submit reports when the afterburner temperature drops below the temperature specified in Permit Condition 4.1.2(c)(ii)(A).

b. Paint Booth		
Applicable Requirements Summary		
Applicable Requirement	Type	Location
Opacity Requirement (35 IAC 212.123)	Applicable Standard	See the Permit, Condition 4.2.2(a)
PM Requirement (35 IAC 212.321)	Applicable Standard	See the Permit, Condition 4.2.2(b)
VOM Requirement (35 IAC 219.204(j))	Applicable Limit	See the Permit, Condition 4.2.2(c)
VOM Requirement (Permit #00050028)	Applicable Limit	See the Permit, Condition 4.2.2(c)
VOM Requirement (Construction Permit #97070099)	Applicable Standard	See the Permit, Condition 4.2.2(d)

Visible Emissions (i.e., Opacity)

- ✓ Monitoring as follows (Condition 4.2.2(a)(ii)(A))
 - o Annual Method 22 observations
 - o If required, Method 9 measurements
- ✓ Recordkeeping as follows (Conditions 4.2.2(a)(ii)(B) and (a)(ii)(C)):
 - o Records of each Method 22 observation
 - o If required, records of each Method 9 measurement
- ✓ Reporting as follows (Condition 4.2.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- There is a small likelihood of an exceedance.
- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- Any visible emissions can be easily observed by the human eye and can be accurately measured by qualified individuals using USEPA Method 9.
- Annual observations of opacity, including records of these observations, are sufficient to verify compliance with the 30% opacity limit for the coil coating lines.

Particulate Matter Emission

- ✓ Recordkeeping as follows (Condition 4.2.2(b)(ii)(A)):
 - o Records of PM emissions from process weight requirements, including hours of operation, method used to determine PM with supporting calculations, monthly PM emissions in pounds and the annual emissions of PM in tons
- ✓ Reporting as follows (Condition 4.2.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- There is a small likelihood of an exceedance.
- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- Compliance with Process weight rule for PM emissions is easily determined by maintaining appropriate records.

Organic Material Emission

- ✓ Monitoring as follows (Condition 4.2.2(a)(ii)(A))
 - Determine daily weighted-average emissions of VOM of coatings applied
- ✓ Testing as follows (Condition 4.2.2(c)(ii)(B))
 - Testing by Method 24 every three years, or by manufacturer
- ✓ Recordkeeping as follows (Condition 4.2.2(c)(ii)(D), 4.1.2(c)(ii)(E), and 4.1.2(d)(ii)(A)):
 - Records of identification, weight of VOM per volume, and daily-weighted average VOM content of all coatings
 - Records of testing and VOM emissions
 - Records of VOM usage
- ✓ Reporting as follows (Condition 4.2.5(a)):
 - Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for this emission unit because:

- There is a small likelihood of an exceedance.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- The periodic monitoring for VOM is sufficient to meet all requirements. Testing ensures accurate calculations for emissions required by recordkeeping in Permit Conditions 4.2.2(c)(ii)(A) and 4.2.2(c)(ii)(B).

Non-Applicability Discussion

Complex non-applicability determinations were made for this emission unit as follows:

- The paint booth is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources of PM, because the paint booth does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels. Based on the max throughputs in the application, even if all of the incoming raw materials were to be converted into emissions (which is ridiculously impossible), PM and VOM emissions would still never exceed major source threshold levels.

Prompt Reporting Discussion

Prompt reporting of deviations has been established as 30 days. See rationale in Chapter III Section 3.9.

In addition, the Permittee shall notify the IEPA at least 30 days before changing the method of compliance

c. Shotblasters		
Applicable Requirements Summary		
Applicable Requirement	Type	Location
Opacity Requirement (35 IAC 212.123)	Applicable Standard	See the Permit, Condition 4.3.2(a)
PM Requirement (Section 39.5(7)(a) of the Act)	Applicable Work Practice	See the Permit, Condition 4.3.2(b)

Visible Emissions (i.e., Opacity)

- ✓ Monitoring as follows (Condition 4.3.2(a)(ii)(A))
 - o Annual Method 22 observations
 - o If required, Method 9 measurements
- ✓ Recordkeeping as follows (Conditions 4.3.2(a)(ii)(B) and (a)(ii)(C)):
 - o Records of each Method 22 observation
 - o If required, records of each Method 9 measurement
- ✓ Reporting as follows (Condition 4.3.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- Presumed as the source is subject to CAM.
- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- Any visible emissions can be easily observed by the human eye and can be accurately measured by qualified individuals using USEPA Method 9.
- Annual observations of opacity, including records of these observations, are sufficient to verify compliance with the 30% opacity limit for the coil coating lines.

PM Emissions

- ✓ Recordkeeping as follows (Condition 4.3.2(b)(ii)(A)):
 - o Records of inspections and repairs
 - o Records of shot usage
 - o Records of PM emissions
 - o Records as specified for source's CAM plan
- ✓ Reporting as follows (Condition 4.3.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- Presumed as the source is subject to CAM.
- There is a small likelihood of an exceedance.

- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- Proper use and maintenance of the dust collectors for these units ensures compliance.

Non-Applicability Discussion

Complex non-applicability determinations were made for this emission unit as follows:

- Pursuant to 35 IAC 212.681, the shotblasters are not subject to 35 IAC 212.321.
- The shotblasters are subject to 35 IAC 212.302 for the Granite City area.
- The shotblasters are not subject to 35 IAC 212.304 through 310 and 312, and are thus not subject to 35 IAC 212.313.
- Pursuant to 35 IAC 212.324(a), the shotblasters are not subject to 35 IAC 212.324, as they are not inside the bounded area.
- The shotblasters are not subject to 35 IAC 212.316, as they must be subject to both 35 IAC 212.324 and 212.302, pursuant to 35 IAC 212.316(a).

Prompt Reporting Discussion

Prompt reporting of deviations has been established as 30 days. See rationale in Chapter III Section 3.9.

d. Natural Gas Fired Boiler		
Applicable Requirements Summary		
Applicable Requirement	Type	Location
Opacity Requirement (35 IAC 212.123)	Applicable Standard	See the Permit, Condition 4.4.2(a)
PM Requirement (Construction Permit #97070099)	Applicable Limit	See the Permit, Condition 4.4.2(b)
CO Requirement (35 IAC 216.121)	Applicable Standard	See the Permit, Condition 4.4.2(c)
CO Requirement (Construction Permit #97070099)	Applicable Limit	See the Permit, Condition 4.4.2(c)
NOx Requirement (Construction Permit #97070099)	Applicable Limit	See the Permit, Condition 4.4.2(d)
Operational and Production Requirement (Construction Permit #97070099)	Applicable Limit	See the Permit, Condition 4.4.2(e)
Work Practice Requirement (40 CFR 60.11(d))	Applicable Work Practice	See the Permit, Condition 4.4.2(f)

Visible Emissions (i.e., Opacity)

- ✓ Monitoring as follows (Condition 4.4.2(a)(ii)(A))

- o Annual Method 22 observations
- o If required, Method 9 measurements
- ✓ Recordkeeping as follows (Conditions 4.4.2(a)(ii)(B) and (a)(ii)(C)):
 - o Records of each Method 22 observation
 - o If required, records of each Method 9 measurement
- ✓ Reporting as follows (Condition 4.4.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- There is a small likelihood of an exceedance.
- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- Any visible emissions can be easily observed by the human eye and can be accurately measured by qualified individuals using USEPA Method 9.
- Annual observations of opacity, including records of these observations, are sufficient to verify compliance with the 30% opacity limit for the coil coating lines.

Particulate Matter Emission

- ✓ Monitoring as follows (Conditions 4.4.2(b)(ii)(A), 4.4.2(e)(ii)(A) and 4.4.2(f)(ii)(A)):
 - o The boiler shall only be fired by natural gas
 - o Monthly inspections of boiler
- ✓ Recordkeeping as follows (Conditions 4.4.2(b)(ii)(A), 4.4.2(e)(ii)(B), 4.4.2(f)(ii)(B),):
 - o Records as specified by 40 CFR 60.7 and 60.48c
 - o Records of natural gas usage
 - o Records of emissions
 - o Records of inspections
- ✓ Reporting as follows (Condition 4.4.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for these emission units because:

- There is a small likelihood of an exceedance.
- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- The likelihood of a violation is small because natural gas is exclusively used as the fuel source for the boiler.

- The periodic monitoring is sufficient for compliance of this boiler.

Carbon Monoxide Emissions

- ✓ Monitoring as follows (Conditions 4.4.2(c)(ii)(A), 4.4.2(e)(ii)(A) and 4.4.2(f)(ii)(A)):
 - o The boiler shall only be fired by natural gas
 - o Monthly inspections of boiler
- ✓ Recordkeeping as follows (Conditions 4.4.2(b)(ii)(A), 4.4.2(e)(ii)(B), 4.4.2(f)(ii)(B),):
 - o Records as specified by 40 CFR 60.7 and 60.48c
 - o Records of natural gas usage
 - o Records of emissions
 - o Records of inspections
- ✓ Reporting as follows (Condition 4.4.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for this emission unit because:

- There is a small likelihood of an exceedance.
- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- The likelihood of a violation is small because natural gas is exclusively used as the fuel source for the boiler.
- The periodic monitoring is sufficient for compliance of this boiler.

Nitrogen Oxides Emissions

- ✓ Monitoring as follows (Conditions 4.4.2(d)(ii)(A), 4.4.2(e)(ii)(A) and 4.4.2(f)(ii)(A)):
 - o The boiler shall only be fired by natural gas
 - o Monthly inspections of boiler
- ✓ Recordkeeping as follows (Conditions 4.4.2(b)(ii)(A), 4.4.2(e)(ii)(B), 4.4.2(f)(ii)(B),):
 - o Records as specified by 40 CFR 60.7 and 60.48c
 - o Records of natural gas usage
 - o Records of emissions
 - o Records of inspections
- ✓ Reporting as follows (Condition 4.4.5(a)):
 - o Prompt reporting within 30 days

Rationale and Justification for Periodic Monitoring

Periodic Monitoring is sufficient for this emission unit because:

- There is a small likelihood of an exceedance.

- Emissions do not vary significantly under normal operation and/or vary slowly with time.
- Source has not exhibited a history of non-compliance for this pollutant. See sections 3.3 and 3.5 of this document.
- Monitoring is consistent with other sources in this source category.
- The likelihood of a violation is small because natural gas is exclusively used as the fuel source for the boiler.
- The periodic monitoring is sufficient for compliance of this boiler.

Non-Applicability Discussion

Complex non-applicability determinations were made for this emission unit as follows:

- Non-applicability determination of 40 CFR 63 Subpart DDDDD was made for the boiler in Permit Condition 4.4 due to the source requesting a synthetic minor limit for HAPs. Compliance date for 40 CFR 63 Subpart DDDDD is January 31, 2016, thus exempting them from the NESHAP before the rule is promulgated.
- Non-applicability of 35 IAC 217.150(Condition 4.4.3(i)) was determined by the source's permit application. The only two emission sources for NO_x are the coating line(which includes the RTO and curing oven), and the boiler. The coating line's maximum emissions(as per Exhibit 260-1) is listed as approximately 17.3 tons/year, and the boiler's maximum emissions(as per Exhibit 240-6) is listed as approximately 11.0 tons/year. Since 28.3 tons/year combined is not considered at or near the threshold for a major source of NO_x (100 tons/year), the source is not subject to 35 IAC 217.150.

Prompt Reporting Discussion

Prompt reporting of deviations has been established as 30 days. See rationale in Chapter III Section 3.9.

3.8 Insignificant Activities Discussion

There are no insignificant activities for the source subject to specific regulations which are obligated to comply with Sections 9.1(d) and Section 39.5 of the Act; Sections 165, 173, and 502 of the Clean Air Act; or any other applicable permit or registration requirements and therefore there are no periodic monitoring requirements that need to be separately addressed.

3.9 Prompt Reporting Discussion

Among other terms and conditions, CAAPP Permits contain reporting obligations to assure compliance with applicable requirements. These reporting obligations are generally four-fold. More specifically, each CAAPP Permit sets forth any reporting requirements specified by state or federal law or regulation, requires prompt reports of deviations from applicable requirements, requires reports of deviations from required monitoring and requires a report certifying the status of compliance with terms and conditions of the CAAPP Permit over the calendar year.

The number and frequency of reporting obligations in any CAAPP Permit is source-specific. That is, the reporting obligations are directly related to factors, including the number and type of emission units and applicable

requirements, the complexity of the source and the compliance status. This four-fold approach to reporting is common to virtually all CAAPP Permits as described below. Moreover, this is the approach established in the Draft CAAPP Permit for this source.

Regulatory Reports

Many state and federal environmental regulations establish reporting obligations. These obligations vary from rule-to-rule and thus from CAAPP source to CAAPP source and from CAAPP Permit to CAAPP Permit. The variation is found in the report triggering events, reporting period, reporting frequency and reporting content. Regardless, the CAAPP makes clear that all reports established under applicable regulations shall be carried forward into the CAAPP Permit as stated in Section 39.5(7)(b) of the Illinois Environmental Protection Act. Generally, where sufficiently detailed to meet the exacting standards of the CAAPP, the regulatory reporting requirements are simply restated in the CAAPP Permit. Depending on the regulatory obligations, these regulatory reports may also constitute a deviation report as described below.

The Draft CAAPP Permit for this source would embody all regulatory reporting as promulgated under federal and state regulations under the Clean Air Act and the Illinois Environmental Protection Act. Depending on the frequency of the report, the regulatory report may also satisfy the prompt reporting obligations discussed below. These reports must be certified by a responsible official.

These reports are generally found in the reporting sections for each emission unit group. The various regulatory reporting requirements are summarized in the table at the end of this Reporting Section.

Deviation Reports (Prompt Reporting)

Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act mandates that each CAAPP Permit require prompt reporting of deviations from the permit requirements.

Neither the CAAPP nor the federal rules upon which the CAAPP is based and was approved by USEPA define the term "prompt". Rather, 40 CFR Part 70.6(a)(3)(iii)(B) intended that the term have flexibility in application. The USEPA has acknowledged for purposes of administrative efficiency and clarity that the permitting authority (in this case, Illinois EPA) has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur at a particular source. The Illinois EPA follows this approach and defines prompt reporting on a permit-by-permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, the Illinois EPA typically incorporates the pre-established timeframe in the CAAPP permit (e.g. a NESHAP or NSPS deviation report). Where the underlying applicable requirement fails to explicitly set forth the timeframe for reporting deviations, the Illinois EPA generally uses a timeframe of 30 days to define prompt reporting of deviations.

This approach to prompt reporting of deviations as discussed herein is consistent with the requirements of Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act as well as 40 CFR Part 70 and the CAA. The reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant attention. The timing for these event-specific notifications is necessary and appropriate as it gives the source enough time to conduct a thorough investigation into the causes of an

event, collecting any necessary data, and developing preventive measures, to reduce the likelihood of similar events, all of which must be addressed in the notification for the deviation, while at the same time affording regulatory authority and the public timely and relevant information. The approach also affords the Illinois EPA and USEPA an opportunity to direct investigation and follow-up activities, and to make compliance and enforcement decisions in a timely fashion.

The Draft CAAPP Permit for this source would require prompt reporting as required by the Illinois Environmental Protection Act in the fashion described in this subsection. In addition, pursuant to Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act, this Draft CAAPP Permit would also require the source to provide a summary of all deviations with the Semi-Annual Monitoring Report. These reports must be certified by a responsible official, and are generally found in the reporting sections for each emission unit group.

Semi-Annual Monitoring Reports

Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act mandates that each CAAPP Permit require a report relative to monitoring obligations as set forth in the permit. Depending upon the monitoring obligation at issue, the semi-annual monitoring report may also constitute a deviation report as previously discussed. This monitoring at issue includes instrumental and non-instrumental emissions monitoring, emissions analyses, and emissions testing established by state or federal laws or regulations or as established in the CAAPP Permit. This monitoring also includes recordkeeping. Each deviation from each monitoring requirement must be identified in the relevant semi-annual report. These reports provide a timely opportunity to assess for compliance patterns of concern. The semi-annual reports shall be submitted regardless of any deviation events. Reporting periods for semi-annual monitoring reports are January 1 through June 30 and July 1 through December 31 of each calendar year. Each semi-annual report is due within 30 days after the close of reporting period. The reports shall be certified by a responsible official. The Draft CAAPP Permit for this source would require such reports at Condition 3.5(b).

Annual Compliance Certifications

Section 39.5(7)(p)(v) of the Illinois Environmental Protection Act mandates that each CAAPP Permit require a source to submit a certification of its compliance status with each term and condition of its CAAPP Permit. The reports afford a broad assessment of a CAAPP sources compliance status. The CAAPP requires that this report be submitted, regardless of compliance status, on an annual basis. Each CAAPP Permit requires this annual certification be submitted by May 1 of the year immediately following the calendar year reporting period. The report shall be certified by a responsible official. The Draft CAAPP Permit for this source would require such a report at Condition 2.6(a).

Prompt reporting of deviations is critical in order to have timely notice of deviations and the opportunity to respond, if necessary. The effectiveness of the permit depends upon, among other important elements, timely and accurate reporting. The Illinois EPA, USEPA, and the public rely on timely and accurate reports submitted by the source to measure compliance and to direct investigation and follow-up activities. Prompt reporting is evidence of the source's good faith in disclosing deviations and describing the steps taken to return to compliance and prevent similar incidents.

Any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in this Draft CAAPP Permit is a deviation subject to prompt reporting. Additionally, any failure to comply with any permit term or condition is a deviation of that permit term or condition and must be reported to the Illinois EPA as a permit deviation. The deviation may or may not be a violation of an emission limitation or standard. A permit deviation can exist even though other indicators of compliance suggest that no emissions violation or exceedance has occurred. Reporting permit deviations does not necessarily result in enforcement action. The Illinois EPA has the discretion to take enforcement action for permit deviations that may or may not constitute a deviation from an emission limitation or standard or the like, as necessary and appropriate.

As a result, the Illinois EPA's approach to prompt reporting of deviations as discussed herein is consistent with the requirements of Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act as well as 40 CFR Part 70 and the CAA. This reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant individual attention.

3.10 Incorporation by Reference Discussion

Based on guidance found in White Paper 2 and past petition responses by the Administrator, it is recognized that Title V permit authorities may, within their discretion, incorporate plans by reference. As recognized in the *White Paper 2*, permit authorities can effectively streamline the contents of a Title V permit, avoiding the inevitable clutter of restated text and preventing unnecessary delays where, as here, permit issuance is subject to a decision deadline.⁴ However, it is also recognized that the benefits of incorporation of plans must be carefully balanced by a permit authority with its duty to issue permits in a way that is "clear and meaningful" to the Permittee and the public.⁵

The criteria that are mentioned in USEPA Administrator Petition Responses stress the importance of identifying, *with specificity*, the object of the incorporation.⁶ The Illinois EPA agrees that such emphasis is generally consistent with USEPA's pronouncements in previous guidance.

For each condition incorporating a plan, the Illinois EPA is also briefly describing the general manner in which the plan applies to the source. Identifying the nature of the source activity, the regulatory requirements or the nature of the equipment associated with the plan is a recommendation of the *White Paper 2*.⁷ The Illinois EPA has stopped short of enumerating the actual contents of a plan, as restating them in the permit would plainly defeat the purpose of incorporating the document by reference and be contrary to USEPA guidance on the subject.⁸

Plans may need to be revised from time to time, as occasionally required by circumstance or by underlying rule or permit requirement. Except where expressly precluded by the relevant rules, this Draft CAAPP Permit allows the Permittee to make future changes to a plan without undergoing formal permit revision procedures. This approach will allow flexibility to make required changes to a plan without separately applying for a revised permit and, similarly, will lessen the impacts that could result for the Illinois EPA if every change to a plan's contents required a permitting transaction.⁹ Changes to the incorporated plans during the permit term are automatically incorporated

into the Draft CAAPP Permit unless the Illinois EPA expresses a written objection.

The Draft CAAPP Permit incorporates by reference the following plans: Fugitive Particulate Matter Operating Program.¹⁰ These plans do not contain the type of information that is integral to assuring compliance with applicable requirements, including emissions limitations, compliance certification, testing monitoring, reporting or recordkeeping requirements, and is indistinguishable from other types of plans (such as operating and maintenance plans and SSM plans)¹¹ that USEPA has historically concluded need not be incorporated into Title V permits.¹²

3.11 Periodic Monitoring General Discussions

Pursuant to Section 504(c) of the Clean Air Act, a Title V permit must set forth monitoring requirements, commonly referred to as "Periodic Monitoring," to assure compliance with the terms and conditions of the permit. A general discussion of Periodic Monitoring is provided below. The Periodic Monitoring that is proposed for specific operations and emission units and at this source is discussed in Chapter III of this Statement of Basis. Chapter III provides a narrative discussion of and justification for the elements of Periodic Monitoring that would apply to the different emission units and types of emission units at the facility.

As a general matter, the required content of a CAAPP Permit with respect to such Periodic Monitoring is addressed in Section 39.5(7) of the Illinois Environmental Protection Act.¹³ Section 39.5(7)(b) of the Illinois Environmental Protection Act¹⁴ provides that in a CAAPP Permit:

The Agency shall include among such conditions applicable monitoring, reporting, record keeping and compliance certification requirements, as authorized by paragraphs d, e, and f of this subsection, that the Agency deems necessary to assure compliance with the Clean Air Act, the regulations promulgated thereunder, this Act, and applicable Board regulations. When monitoring, reporting, record keeping and compliance certification requirements are specified within the Clean Air Act, regulations promulgated thereunder, this Act, or applicable regulations, such requirements shall be included within the CAAPP Permit.

Section 39.5(7)(d)(ii) of the Illinois Environmental Protection Act further provides that a CAAPP Permit shall:

Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), require Periodic Monitoring sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit

...

Accordingly, the scope of the Periodic Monitoring that must be included in a CAAPP Permit is not restricted to monitoring requirements that were adopted through rulemaking or imposed through permitting. When applicable regulatory emission standards and control requirements or limits and control requirement in relevant Title 1 permits are not accompanied by compliance procedures, it is necessary for Monitoring for these standards, requirements or limits to be established in a CAAPP Permit.^{15, 16} Monitoring requirements must also be established when standards and control requirement are accompanied by

compliance procedures but those procedures are not adequate to assure compliance with the applicable standards or requirements.^{17, 18} For this purpose, the requirements for Periodic Monitoring in a CAAPP Permit may include requirements for emission testing, emissions monitoring, operational monitoring, non-instrumental monitoring, and recordkeeping for each emission unit or group of similar units at a facility, as required by rule or permit, as appropriate or as needed to assure compliance with the applicable substantive requirements. Various combinations of monitoring measures will be appropriate for different emission units depending on their circumstances, including the substantive emission standards, limitations and control requirements to which they are subject.

What constitutes sufficient Periodic Monitoring for particular emission units, including the timing or frequency associated with such Monitoring requirements, must be determined by the permitting authority based on its knowledge, experience and judgment.¹⁹ For example, as Periodic Monitoring must collect representative data, the timing of Monitoring requirements need not match the averaging time or compliance period of the associated substantive requirements, as set by the relevant regulations and permit provisions. The timing of the various requirements making up the Periodic Monitoring for an emission unit is something that must be considered when those Monitoring requirements are being established. For this purpose, Periodic Monitoring often consists of requirements that apply on a regular basis, such as routine recordkeeping for the operation of control devices or the implementation of the control practices for an emission unit. For certain units, this regular monitoring may entail "continuous" monitoring of emissions, opacity or key operating parameters of a process or its associated control equipment, with direct measurement and automatic recording of the selected parameter(s). As it is infeasible or impractical to require emissions monitoring for most emission units, instrumental monitoring is more commonly conducted for the operating parameters of an emission unit or its associated control equipment. Monitoring for operating parameter(s) serves to confirm proper operation of equipment, consistent with operation to comply with applicable emission standards and limits. In certain cases, an applicable rule may directly specify that a particular level of an operating parameter be maintained, consistent with the manner in which a unit was being operated during emission testing. Periodic Monitoring may also consist of requirements that apply on a periodic basis, such as inspections to verify the proper functioning of an emission unit and its associated controls.

The Periodic Monitoring for an emission unit may also include measures, such as emission testing, that would only be required once or only upon specific request by the Illinois EPA. These requirements would always be accompanied by Monitoring requirements would apply on a regular basis. When emission testing or other measure is only required upon request by the Illinois EPA, it is included as part of the Periodic Monitoring for an emission unit to facilitate a response by the Illinois EPA to circumstances that were not contemplated when Monitoring was being established, such as the handling of a new material or a new mode of operation. Such Monitoring would also serve to provide further verification of compliance, along with other potentially useful information. As emission testing provides a quantitative determination of compliance, it would also provide a determination of the margin of compliance with the applicable limit(s) and serve to confirm that the Monitoring required for an emission unit on a regular basis is reliable and appropriate. Such testing might also identify specific values of operating parameters of a unit or its associated control equipment that accompany compliance and can be relied upon as part of regular Monitoring.

There are a number of considerations or factors that are or may be relevant when evaluating the need to establish new monitoring requirements as part of the Periodic Monitoring for an emission unit. These factors include: (1) The nature of the emission unit or process and its emissions; (2) The variability in the operation and the emissions of the unit or process over time; (3) The use of add-on air pollution control equipment or other practices to control emissions and comply with the applicable substantive requirement(s); (4) The nature of that control equipment or those control practices and the potential for variability in their effectiveness; (5) The nature of the applicable substantive requirement(s) for which Periodic Monitoring is needed; (6) The nature of the compliance procedures that specifically accompany the applicable requirements; (7) The type of data that would already be available for the unit; (8) The effort needed to comply with the applicable requirements and the expected margin of compliance; (9) The likelihood of a violation of applicable requirements; (10) The nature of the Periodic Monitoring that may be readily implemented for the emission unit; (11) The extent to which such Periodic Monitoring would directly address the applicable requirements; (12) The nature of Periodic Monitoring commonly required for similar emission units at other facilities and in similar circumstances; (13) The interaction or relationship between the different measures in the Periodic Monitoring for an emission unit; and (14) The feasibility and reasonableness of requiring additional measures in the Periodic Monitoring for an emission unit in light of other relevant considerations.²⁰

CHAPTER IV - CHANGES FROM PREVIOUSLY ISSUED CAAPP PERMITS

4.1 Major Changes Summary

This renewal CAAPP draft is presented in a new format. The new format is the result of recommendations by the USEPA, comments made by sources, and interactions with the public.

	<i>Previous CAAPP Permit Layout</i>	<i>New CAAPP Permit Layout</i>
Section 1	Source Identification	Source Information
Section 2	List Of Abbreviations/Acronyms	General Permit Requirements
Section 3	Insignificant Activities	Source Requirements
Section 4	Significant Emission Units	Emission Unit Requirements
Section 5	Overall Source Conditions	Title I Requirements
Section 6	Emission Control Programs	Insignificant Activities
Section 7	Unit Specific Conditions	Other Requirements
Section 8	General Permit Conditions	State Only Requirements
Section 9	Standard Permit Conditions	---
Section 10	Attachments	Attachments

4.2 Specific Permit Condition Changes

General requirements related to asbestos demolition and renovation, not included in the previous Title V permit, were added to the source wide requirements in Section 3.

NO_x RACT requirements for the boiler were added to state only requirements in Section 8.

Endnotes

¹ The federal PSD program, 40 CFR 52.21, applies in Illinois. The Illinois EPA administers PSD permitting for major projects in Illinois pursuant to a delegation agreement with USEPA.

² Illinois has a state nonattainment NSR program, pursuant to state rules, Major Stationary Sources Construction and Modification ("MSSCM"), 35 IAC Part 203, which have been approved by USEPA as part of the State Implementation Plan for Illinois.

³ The incorporation, or carry-over, of terms or conditions from previous Title I permits into Title V permits typically does not occur on a wholesale basis. Recognizing that construction permits may frequently contain obsolete or extraneous terms and conditions, USEPA has emphasized that only "environmentally significant terms" from previous preconstruction permits must be carried over into Title V permits. See, White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995. Therefore, certain T1 terms and conditions have not been carried over from these SIP approved permits for reasons that are explained below.

⁴ Among other things, USEPA observed that the stream-lining benefits can consist of "reduced cost and administrative complexity, and continued compliance flexibility...". *White Paper 2*, page 41.

⁵ See, *In the Matter of Tesoro Refining and Marketing*, Petition No. IX-2004-6, Order Denying in Part and Granting in Part Petition for Objection to Permit, at page 8 (March 15, 2005); see also, *White Paper 2* at page 39 ("reference must be detailed enough that the manner in which any referenced materials applies to a facility is clear and is not reasonably subject to misinterpretation").

⁶ The Order provides that permit authorities must ensure the following: "(1) referenced documents be specifically identified; (2) descriptive information such as the title or number of the document and the date of the document be included so that there is no ambiguity as to which version of the document is being referenced; and (3) citations, cross references, and incorporations by reference are detailed enough that the manner in which any referenced material applies to a facility is clear and is not reasonably subject to misinterpretation." See, *Petition Response* at page 43, citing *White Paper 2* at page 37.

⁷ See, *White Paper 2* at page 39.

⁸ Nothing in USEPA guidance, including the *White Paper 2* or previous orders responding to public petitions, supports the notion that permit authorities incorporating a document by reference must also restate contents of a given plan in the body of the Title V permit. Such an interpretation contradicts USEPA recognition that permit authorities need not restate or recite an incorporated document so long as the document is sufficiently described. *White Paper 2* at page 39; see also, *In the matter of Consolidated Edison Co. of New York, Inc., 74th St. Station*, Petition No. II-2001-02, Order Granting in Part and Denying in Part Petition for Objection to Permit at page 16 (February 19, 2003).

⁹ This approach is consistent with USEPA guidance, which has previously embraced a similar approach to certain SSM plans. See, *Letter and Enclosures*, dated May 20, 1999, from John Seitz, Director of Office of Air Quality Planning and Standards, to Robert Hodanbosi and Charles Lagges, STAPPA/ALAPCO, pages 9-10 of Enclosure B.

¹⁰ Each incorporated plan addressed by this Section of the Statement of Basis is part of the source's permit file. As such, these plans are available to any person interested in viewing the contents of a given plan may do so at the public repository during the comment period or, alternatively, may request a copy of the same from the Illinois EPA under the Freedom of Information Act. See also 71 FR 20447.

¹¹ See, *Letter and Enclosures*, dated May 20, 1999, from John Seitz, Director of Office

of Air Quality Planning and Standards, to Robert Hodanbosi and Charles Lagges, STAPPA/ALAPCO, page 9 of Enclosure B.

¹² In the most recent final rulemaking for 40 CFR 63, Subpart A - General Provisions, the US EPA dealt with the need for SSM Plans to be available, the level of detail in an SSM necessary for purposes including permitting and whether a SSM Plan is tantamount to a compliance schedule necessary for incorporation into a Title V permit. USEPA concluded that SSM Plans need not be mandatorily available for public access but rather must be made available upon request by the permitting authority. In addition, these plans do not contain enforceable requirements necessary to demonstrate compliance with the general duty clause at 63.6(e)(1)(i) and are therefore not applicable requirements. Lastly, SSM Plans are not of the same ilk as a compliance schedule required in 502(b)(8) or 503(c) of the CAA or 40 CFR 70.5(c)(8) as the criteria for such documents are clearly distinguishable for each. See, FR Vol. 71, No. 76/Thursday, April 20, 2006 (pg. 20447 and 20449 - 20451); FR Vol. 70, No. 145/Friday, July 29, 2005 (pg. 43993 - 43994); FR Vol. 67, No. 236/Monday December 9, 2002 (pg. 72880). Therefore, the Illinois EPA has concluded that these plans are not required to be incorporated by reference or any of the content of such plans need be incorporated into the CAAPP permit.

¹³ The provisions of the Act for Periodic Monitoring in CAAPP permits reflect parallel requirements in the federal guidelines for State Operating Permit Programs, 40 CFR 70.6(a)(3)(i)(A), (a)(3)(i)(B), and (c)(1).

¹⁴ Section 39.5(7)(p)(i) of the Act also provides that a CAAPP permit shall contain "Compliance certification, testing, monitoring, reporting and record keeping requirements sufficient to assure compliance with the terms and conditions of the permit."

¹⁵ The classic example of regulatory standards for which Periodic Monitoring requirements must be established in a CAAPP permit are state emission standards that pre-date the 1990 Clean Air Act Amendments that were adopted without any associated compliance procedures. Periodic Monitoring must also be established in a CAAPP permit when standards and limits are accompanied by compliance procedures but those procedures are determined to be inadequate to assure compliance with the applicable standards or limits.

¹⁶ Another example of emission standards for which requirements must be established as part of Periodic Monitoring is certain NSPS standards that require initial performance testing but do not require periodic testing or other measures to address compliance with the applicable limits on a continuing basis.

¹⁷ The need to establish Monitoring requirements as part of Periodic Monitoring when existing compliance procedures are determined to be inadequate, as well as when they are absent, was confirmed by the federal appeals court in *Sierra Club v. Environmental Protection Agency*, 536 F.3d 673, 383 U.S. App. D.C. 109.

¹⁸ The need to establish Monitoring requirements as part of Periodic Monitoring is also confirmed in USEPA's Petition Response. USEPA explains that "...if there is periodic monitoring in the applicable requirements, but that monitoring is not sufficient to assure compliance with permit terms and conditions, permitting authorities must supplement monitoring to assure such compliance." Petition Response, page 6.

¹⁹ The test for the adequacy of "Periodic Monitoring" is a context-specific determination, particularly whether the provisions in a Title V permit reasonably address compliance with relevant substantive permit conditions. 40 CFR 70.6(c)(1); see also 40 CFR 70.6(a)(3)(i)(B); see also, *In the Matter of CITGO Refinery and Chemicals Company L.P.*, Petition VI-2007-01 (May 28, 2009); see also, *In the Matter of Waste Management of LA. L.L.C. Woodside Sanitary Landfill & Recycling Center, Walker, Livingston Parish, Louisiana*, Petition VI-2009-01 (May 27, 2010); see also, *In the Matter of Wisconsin Public Service Corporation's JP Pulliam Power Plant*, Petition V-2009-01 (June 28, 2010).

²⁰ A number of these factors are specifically listed by USEPA in its Petition Response. USEPA also observes that the specific factors that it identifies in its Petition Response with respect to Periodic Monitoring provide "...the permitting authority with a starting point for its analysis of the adequacy of the monitoring; the permitting authority also may consider other site-specific factors." Petition Response, page 7.