

217/782-2113

"REVISED"  
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Hendrickson Spring  
Attn: Thomas Mull  
2433-41 West 48th Street  
Chicago, Illinois 60632

Application No.: 96030105                      I.D. No.: 031600CFY  
Source Location: 2433-41 West 48th Street, Cook County  
Operation of: Steel Spring Manufacturing  
Date Received: March 7, 1996  
Date Issued: December 9, 1998              Expiration Date: December 9, 2003  
Responsible Official: Thomas Mull, Sr. Health and Safety Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a steel spring manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: May 24, 2001  
Revision Date Issued: September 12, 2001  
Purpose of Revision: Administrative Amendment

This administrative amendment incorporates the construction and/or modification permitted in construction permits 00060105 and 99110069. Because the changes in the permit were only administrative, no formal public notice was issued.

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

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

DES:AB:jar

cc: Illinois EPA, FOS, Region 1  
USEPA

<sup>1</sup> 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.

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Hendrickson Spring  
2433-41 West 48th Street  
Chicago, Illinois 60632  
773/376-1200

I.D. No.: 031600CFY

Standard Industrial Classification: 3714, Motor Vehicle Parts  
and Accessories

1.2 Owner/Parent Company

The Boler Company  
500 Park Boulevard  
Itasca, Illinois 60143

1.3 Operator

Hendrickson Spring  
2433-41 West 48th Street  
Chicago, Illinois 60632

Contact Person: Chester Gniadecki  
773/376-1200

1.4 General Source Description of Source

Hendrickson Spring located at 2433-41 West 48th Street in Chicago manufactures truck and trailer leaf springs. The spring manufacturing process is characterized by the following primary activities: forging, heat treatment, coating and assembly.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
°F	degrees Fahrenheit
ft	feet
ft <sup>3</sup>	cubic foot
g	grams
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
HP	Horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
lb	pound
LEL	Lower Explosive Limit
m	meter
mmBtu	Million Btus
mg	milligrams
mo	month
MW	Megawatts
NSPS	New Source Performance Standards
NO <sub>x</sub>	Nitrogen Oxides
PIMW	Potentially Infectious Medical Wastes
PM	Particulate Matter
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
T	Tons
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
Wt.	weight
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

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

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

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 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: Boiler and heaters with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas.

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

#### 3.2 Addition of Insignificant Activities

- 3.2.1 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).

- 3.2.2 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.

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Coating Lines	Three Dip Coating Tanks with Oven	None
Group 2	Heat Treat Lines	Lines #5 and #7	None
Group 3	Furnaces	One Hot Clip Furnace (EP-2)	None
Group 4	Center Heater	Produces Heat for Forge Furnaces	None
Group 5	Shot Blasting Stations	Three Stations #1, 2, 3	Two Baghouses

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 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 emissions of including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. Emissions of smoke or other particulate matter from any emission unit shall not exceed 30% opacity, except that opacity of greater than 30% but less than 60% shall be allowed for periods aggregating 8 minutes in any 60 minutes period provided that such more opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any such emission unit owned or operated by the Permittee and provided further that such more opaque emissions permitted from each such emission unit shall be limited to 3 times per 24 hour period pursuant to 35 IAC 212.123(a) and (b).
- c. No person shall cause or allow the emissions of sulfur dioxide into the atmosphere from any process emission unit in excess of 2,000 ppm [35 IAC 214.301].

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with

the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3 Non-Applicability of Regulations of Concern

None

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)	74.1
Sulfur Dioxide (SO <sub>2</sub> )	0.6
Particulate Matter (PM)	120.6
Nitrogen Oxides (NO <sub>x</sub> )	41.66
HAP, not included in VOM or PM	----
TOTAL	236.96

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

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, or Section 502(b) (10) of the CAA.

## 5.6 General Recordkeeping Requirements

### 5.6.1 Emission records

The Permittee shall keep and maintain records of total emissions on a calendar year basis for the equipment covered by unit-specific conditions (Section 7) to demonstrate compliance with Condition 5.5.1.

### 5.6.2 Retention and Availability of Records

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

## 5.7 General Reporting Requirements

### 5.7.1 Annual Emissions Report

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

- 5.7.2 The Permittee shall promptly notify the Illinois EPA if the emissions exceed the limits in Condition 5.5.1 and appropriate unit-specific conditions of Section 7

## 5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

## 5.9 General Compliance Procedures

### 5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements, and Compliance Procedures in Section 7 (Unit-Specific Conditions) of this permit.

## 6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

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

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

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

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

This section becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

### 6.2 Applicability

Emissions of VOM from the source for the seasonal allotment period of May 1 through September 30 of each year shall not exceed 26.17 tons, not including VOM from insignificant units and activities, as identified in Section 3 of this permit. This

limitation is established at the request of the source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 IAC 205.205(b) by agreeing to an 18% reduction from the Illinois EPA's determination that the source's baseline emissions were 31.91 tons.

### 6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine of compliance with the above limitation:
  - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate to determine VOM emissions during the seasonal allotment period;
  - ii. Records of the VOM emissions in tons during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
  - iii. Total VOM emissions from the source, not including VOM emissions from insignificant units and activities, in tons during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the annual emissions report by October 31 of each year, reporting emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 26.17 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC 205.200, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Coating Lines

7.1.1 Description

Coating operation consists of three dip coating tanks with oven for painting automotive springs. Both water-based and solvent coatings being applied during coating operations.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Coating Lines	Three Dip Coating Tanks: EP-37, EP-62 and EP-63 with Oven Date of Construction: EP-37: 1995 EP-62/63: 2000	None

7.1.3 Applicability Provisions and Applicable Regulations

a. The "affected coating line" for the purpose of these unit specific conditions is dip coating tank which is used to apply an extreme performance coating to automotive springs.

b. Each affected coating line at the source is subject to limitations of 35 IAC 218.204 (j)(2)(B) for extreme performance baked coating, which provides that:

i. No owner or operator of an affected coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for the coating as applied to Miscellaneous Metal Parts and Products. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

<u>kg/l</u>	<u>lb/gal</u>
0.40	3.3

ii. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites.

c. The affected coating line at the source is subject to 35 IAC 212.321(1), which provides that:

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

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

Where:

P = Process weight rate;

E = Allowable emission rate; and,

A. For process weight rates up to 408 Mg/hr (450 T/hr):

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

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

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

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. The affected coating line is not subject to 35 IAC Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes affected coating line from this requirement because of applicability of 35 IAC 218.204.

- b. The affected coating line is not subject 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.
- c. The affected coating line is not subject 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.

7.1.5 Operational and Production Limits and Work Practices

The affected coating line bake oven shall only be operated with natural gas as the fuel.

7.1.6 Emission Limitations

In addition to Condition 5.2.2, the source wide emission limitations in Condition 5.5.1 and limitation in Condition 7.1.3, the affected coating lines are subject to the following:

Total combined emissions and operation of all coating lines (EP-37, EP-62, EP-63) shall not exceed the following limits:

a. VOM Emissions

<u>Material</u>	Maximum Usage		VOM	VOM Emissions	
	<u>(gal/mo)</u>	<u>(gal/yr)</u>	<u>Content (lb/gal)</u>	<u>(T/mo)</u>	<u>(T/yr)</u>
Water-Based Coating	5,448	54,472	1.4	3.8	38.1

The above limitations were established in Permits 00060105 and 99110069, pursuant to 35 IAC Part 203. 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 35 IAC Part 203 [T1].

b. NO<sub>x</sub> Emissions

i. Bake Oven (EP-59):

<u>Item of Equipment</u>	Natural Gas Usage		NO <sub>x</sub> Emissions	
	<u>(ft<sup>3</sup>/yr)</u>	<u>(ft<sup>3</sup>/yr)</u>	<u>(T/mo)</u>	<u>(T/yr)</u>
Bake Oven	10 <sup>6</sup> x 4	10 <sup>6</sup> x 38.5	0.2	1.93

These limits originate from construction permit #96040117 and based on the maximum operating rates (firing rate 4.4 mmBtu/hr), standard emission factors given by AP-42 and year round operations. Compliance with annual limits shall be determined from a running total of 12 months of data.

#### 7.1.7 Testing Requirements

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

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

- a. The VOM content in units of lb/gal or wt. % of representative coatings "as applied" on the affected coating lines shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a); and
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9 directly reflect the application of such material and separately account for any additions of solvent.

#### 7.1.8 Monitoring Requirements

None

#### 7.1.9 Recordkeeping Requirements

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

- a. The name and identification number of each coating as applied on the affected coating line;
- b. The weight of VOM and HAP per volume and the volume of each coating (minus water and any compounds which

are specifically exempted from the definition of VOM) as applied on the affected coating lines;

- c. The VOM and HAP content of each coating applied, % by wt.
- d. Density of each coating applied, lb/gal.
- e. The usage of each coating, clean-up solvent and any VOM containing materials, in units of gallons/month and gallons/year;
- f. Total VOM and HAPs emissions in tons/month and tons/year from each dip coating tank and paint spray booth and based on the compliance procedures from Condition 7.1.12;
- g. Records of the testing of VOM and HAP content of each coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and
  - iv. Person performing analysis.

#### 7.1.10 Reporting Requirements

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

- a. Pursuant to 35 IAC 218.211(c)(3)(A), the Permittee shall notify the Illinois EPA of any record showing violation of Condition 7.1.3(b) within 30 days of such an occurrence; and
- b. Emissions of VOM from affected coating lines in excess of the limits specified in Condition 5.5.1 and Condition 7.1.6 based on the 12 months rolling period.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating lines 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:

Usage of coatings, thinners, or cleaning solvents at this source with various VOM contents provided that the materials are tested in accordance with Condition 7.1.7, the source wide emission limitations in Condition 5.5.1 and limitations in Condition 7.1.6 are not exceeded and the affected coating lines remain in compliance with Condition 7.1.3(b).

#### 7.1.12 Compliance Procedures

- a. Compliance of the affected coating lines with the source wide emission limitations in Condition 5.5.1 and limitations for the coating lines in Condition 7.1.6 shall be based on the recordkeeping requirements in Condition 7.1.9 and the following equation:
  - i. Emissions from Coating Operation (E1) = Actual Coating Usage (gal) x Coating Density (lb/gal) x VOM Content of the Coating (wt. %);
  - ii. Emissions from Cleanup Operation (E2) = (Actual Clean-up Solvent Usage (gal) x Solvent Density (lb/gal) x VOM Content of the Clean-up Solvent (wt. %));
  - iii. Total VOM emissions = E1 + E2
- b. Emissions of HAPs shall be calculated based on the following equation:  
  
Actual Coating/Clean-Up solvent Usage (gal) x Coating/Clean-Up Solvent Density (lb/gal) x HAP Content (wt. %).
- c. Compliance of the affected coating lines with VOM emission limitations in Condition 7.1.3(b) shall be based on the recordkeeping requirements in Condition 7.1.9 and by the use of either testing as required in Condition 7.1.7 or by use of the formula listed below:

$$\text{VOM Coating Content} = V \times D / [1 - W \times D],$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \sum (w_i/d_i),$$

Where:

$w_i$  = Percent exempt compound  $i$  in the coating,

$d_i$  = Overall density of exempt compound  $i$ , lb/gal

and the summation **S** is applied over water and all exempt compounds  $i$  in the coating.

7.2 Group 2: Heat Treat Lines #5, 7

7.2.1 Description

Following the forging operation, the steel is moved to one of the existing heat treat lines where it passes through a high temperature furnace, cambering press, quench oil bath, tempering furnace and hot water wash.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 2	Heat Treat Lines #5, 7	Each Heat Treat Line comprises the following units: High Heat Furnace; Tempering Furnace; Quench Oil Tank  Date of Construction: Line #5-1973  Line #7-1973	Filter (Quench Oil Tank)  Filter (Quench Oil Tank)

7.2.3 Applicability Provisions and Applicable Regulations

- a. Each "affected heat treat line" for the purpose of these unit specific conditions includes high heat furnace, tempering furnace and quench oil tank which are used for achieving a specific grade of hardness of final product.
- b. Each affected heat treat line at the source is subject to 35 IAC 212.321(1), which provides that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
  - ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected rustproofing station shall not exceed the allowable emission rates specified in the following equation:

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

Where:

P = Process weight rate;

E = Allowable emission rate; and,

- A. For process weight rates up to 408 Mg/hr (450 T/hr):

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

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

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

#### 7.2.4 Non-Applicability of Regulations of Concern

The affected heat treat lines are not regulated by 35 IAC 216.141 and 212.184, because this system is a process emission unit but not fuel combustion or incinerator unit.

#### 7.2.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected heat treat lines.

#### 7.2.6 Emission Limitations

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

##### Line #5

<u>Item of Equipment</u>	<u>Natural Gas Usage</u>		<u>NO<sub>x</sub> Emissions</u>	
	<u>(ft<sup>3</sup>/mo)</u>	<u>(ft<sup>3</sup>/yr)</u>	<u>(T/mo)</u>	<u>(T/yr)</u>
High Heat Treat Furnace (EP-45)	10 <sup>6</sup> x 14	10 <sup>6</sup> x 141	0.7	7.05

These limits originate from construction permit #96040117 and based on the maximum operating rates (firing rate 5.8

mmBtu/hr for high heat furnace), standard emission factors given by AP-42 and year round operations. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

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

- a. Total natural gas usage for all heat treat lines, in units therms/mo or scf/mo and therms/yr or scf/yr;
- b. Emissions of NO<sub>x</sub> (T/mo and T/yr) from heat treat lines #5 and 7 based on the 12 month rolling period and compliance procedure in Condition 7.2.12.

7.2.10 Reporting Requirements

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

Total emissions of NO<sub>x</sub> from affected heat treat line 5 in excess of the limits specified in Condition 7.2.6 based on the 12 months rolling period.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance of the affected heat treat lines with the source wide emission limitations in Condition 5.5.1 and Condition 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and the following equation:

To determine compliance with Condition 5.5.1 and Condition 7.2.6, emissions from the heat treat lines burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	Natural Gas Emission Factors <u>(lb/10<sup>6</sup> ft<sup>3</sup>)</u>
PM	7.6
NO <sub>x</sub>	100
SO <sub>2</sub>	0.6
VOM	5.5

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

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

7.3 Group 3: Furnaces

7.3.1 Description

Natural gas-fired forge furnace EP-2 is used for softening the steel before machining operations.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 3	Furnaces	One Hot Clip Furnace (EP-2)  Firing Rate, mmBtu/hr: EP-2: 8.8  Construction Dates: EP-2: 1995	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected furnace" for the purpose of these unit specific conditions is a natural gas-fired forge furnace for softening the steel prior to machining operations.
- b. Each affected furnace is subject to 35 IAC 212.321(b)(1), which provides that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
  - ii. The emissions of particulate matter into the atmosphere in any one hour period from the affected furnace shall not exceed the allowable emission rates specified in the following equation:

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

Where:

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

- A. For process weight rates up to 408 Mg/hr (450 T/hr):

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

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

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

7.3.4 Non-Applicability of Regulations of Concern

Each affected furnace is not regulated by 35 IAC 216.141 and 212.184, because this system is a process emission unit but not fuel combustion or incinerator unit.

7.3.5 Operational and Production Limits and Work Practices

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

7.3.6 Emission Limitations

Emissions and operation of the affected furnaces shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Natural Gas Usage</u>		<u>NO<sub>x</sub> Emissions</u>	
	<u>(ft<sup>3</sup>/mo)</u>	<u>(ft<sup>3</sup>/yr)</u>	<u>(T/mo)</u>	<u>(T/yr)</u>
Hot Clip Furnace	10 <sup>6</sup> x 7.7	10 <sup>6</sup> x 77	0.38	3.8

These limits originate from construction permits #95050214 and #95040129 and based on the maximum operating rates, standard emission factors given by AP-42 and year round operations. Compliance with annual limits shall be determined from a running total of 12 months of data.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

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

- a. Natural gas usage for hot clip furnace (EP-2), in units therms/mo or scf/mo and therms/yr or scf/yr;
- b. Emissions of NO<sub>x</sub> (T/mo and T/yr) from parabolic hot clip furnace (EP-2 ) based on the 12 month rolling period and compliance procedure in Condition 7.3.12.

7.3.10 Reporting Requirements

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

Emissions of NO<sub>x</sub> from affected furnace in excess of the limits specified in Condition 7.3.6 based on the 12 months rolling period.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance of the affected furnaces with the source wide emission limitations in Condition 5.5.1 and Condition 7.3.6 shall be based on the recordkeeping requirements in Condition 7.3.9 and the following equation:

To determine compliance with Condition 7.3.6, emissions from the affected furnace burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Natural Gas Emission Factors (lb/10<sup>6</sup> ft<sup>3</sup>)</u>
PM	7.6
NO <sub>x</sub>	100
SO <sub>2</sub>	0.6
VOM	5.5

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

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

7.4 Group 4: Central Heater

7.4.1 Description

Natural gas-fired center heater located at the source is used to produce heat for forge furnaces.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 4	Center Heater (EP-1)	Natural Gas-Fired Heater.  Maximum Heating Capacity: 4.8 mmBtu/hr	None

7.4.3 Applicability Provisions and Applicable Regulations

An "affected center heater" for the purpose of these unit specific conditions is a natural gas-fired heater producing heat for forge furnaces.

7.4.4 Non-Applicability of Regulations of Concern

- a. Affected center heater located at the source is not subject to 35 IAC 217.141, Emissions Of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of the heater is less than 73.2 MW (250 mmBtu/hr).
- b. Affected central heater located at the source is not subject to 35 IAC 216.121, Fuel Combustion Emission Sources, because the actual heat input from heater is less than 2.9 MW (10 mmBtu/hr).
- c. Pursuant to 35 IAC 218.303, any fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

7.4.5 Operational and Production Limits and Work Practices

Affected heater shall only be operated with natural gas as the fuel.

7.4.6 Emission Limitations

None

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

Total natural gas usage (therms or scf /month and therms or scf/year).

7.4.10 Reporting Requirements

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

None

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance with the emission limits shall be demonstrated based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

To determine compliance with Condition 5.5.1, emissions from the heater burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	Natural Gas
	<u>Emission Factors</u> <u>(lb/10<sup>6</sup> ft<sup>3</sup>)</u>
PM	7.6
NO <sub>x</sub>	100
SO <sub>2</sub>	0.6
VOM	5.5

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

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

7.5 Group 5: Shot Blasting Stations

7.5.1 Description

Shot blasting stations used for removal of scale and rust debris from the surface of a spring prior to the painting operation.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 5	Shot Blasting Stations	Three Shot Blasting Stations #1 - #3, Designation EP-32-EP-34.  Date of Construction: #1, 2, 3: 1973	Baghouse (Unit #1) Baghouse (Units #2 and #3)

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected shot blasting station " for the purpose of these unit specific conditions is a shot blasting operation that includes a shot blaster which is controlled by either baghouse or filter and is used for removal of scale and rust debris from the surface of a spring prior to the painting operation.
- b. Each affected shot blasting station at the source is subject to 35 IAC 212.301, Fugitive Particulate Matter, which provides that no person shall cause or allow the emission of fugitive particulate matter from any process, including material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

7.5.4 Non-Applicability of Regulations of Concern

Each affected shot blasting station is not subject to 35 IAC 212.321 and 212.322, Particulate Matter Emissions from New or Existing Process Emission Sources, pursuant to 35 IAC 212.681, Grinding, Woodworking, Sandblasting and Shotblasting.

7.5.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the baghouse and dust collector, including periodic inspection (checking the pressure drop on a regular basis in order to ensure proper operation and the need for replacement), routine maintenance and prompt repair of defects.

7.5.6 Emission Limitations

None

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

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

- a. Records addressing use of good operating practices for the baghouse and dust collector:
  - i. Records for periodic inspection of the air control equipment with date, individual performing the inspection, and nature of inspection; and
  - ii. Records of prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- b. The annual PM emissions from the affected shot blasting stations based on the typical emission rate, with supporting calculations.

7.5.10 Reporting Requirements

None

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.5.12 Compliance Procedures

- a. Compliance with the emission limits is assured and achieved by the proper operation and maintenance of the control equipment as required by this section and the work-practices inherent in operation of an affected shot blasting stations.
- b. To determine compliance with Condition 5.5.1, emissions from the affected shot blasting operations shall be calculated based on the following:

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

\* As specified by manufacturer or vendor of control unit.

## 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 as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after June 6, 1998 unless the permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or

operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

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

#### 8.5 Testing Procedures

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

#### 8.6 Reporting Requirements

##### 8.6.1 Monitoring Reports

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

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

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

#### 8.6.2 Test Notifications

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

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

#### 8.6.3 Test Reports

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

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

- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

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

- i. Illinois EPA - Air Compliance Section

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

- ii. Illinois EPA - Air Regional Field Office

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

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

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

- iv. USEPA - Air Branch

United States EPA (AR - 18J)  
Air & Radiation Branch (Illinois - Indiana)  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

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

## 9.0 Standard Permit Conditions

### 9.1 Effect of Permit

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

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

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

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

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

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

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

#### 9.2.2 Duty to Maintain Equipment

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

#### 9.2.3 Duty to Cease Operation

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

#### 9.2.4 Disposal Operations

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

#### 9.2.5 Duty to Pay Fees

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

### 9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

#### 9.4 Obligation to Comply With Other Requirements

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

#### 9.5 Liability

##### 9.5.1 Title

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

##### 9.5.2 Liability of Permittee

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

##### 9.5.3 Structural Stability

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

##### 9.5.4 Illinois EPA Liability

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

#### 9.5.5 Property Rights

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

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

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

#### 9.6.2 Records of Changes in Operation

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

#### 9.6.3 Retention of Records

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

### 9.7 Annual Emissions Report

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

### 9.8 Requirements for Compliance Certification

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

- a. The certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. The

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

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

#### 9.9 Certification

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

#### 9.10 Defenses to Enforcement Action

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

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

##### 9.10.2 Emergency Provision

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

emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in the permit.

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

#### 9.11 Permanent Shutdown

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

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

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

##### 9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that the permit contains a material mistake or inaccurate statement

when establishing the emission standards or limitations, or other terms or conditions of the permit; and

- d. The Illinois EPA or USEPA determines that the permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

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

#### 9.12.4 Duty to Provide Information

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

#### 9.13 Severability Clause

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

#### 9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

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

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

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

AB:jar