PROPOSED PERMIT
National Bathing Products
I.D. No.: 197090AAA
Application No.: 95120224
December 17, 1999

217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

National Bathing Products
Attn: Gregory S. Salach
5 Greenwood Avenue
Romeoville, Illinois 60441-1398

Application No.: 95120224
I.D. No.: 197090AAA
Applicant's Designation:
Date Received: December 14, 1995
Operation of: Manufacturing Plastic Plumbing Fixtures
Date Issued: May 10, 1999
Expiration Date[2]: May 10, 2004
Source Location: 5 Greenwood Avenue, Romeoville, Will County
Responsible Official: Gregory S. Salach

This permit is hereby granted to the above-designated Permittee to OPERATE a plastic plumbing fixtures plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: August 9, 1999
Revision Date Issued: TO BE DETERMINED
Purpose of Revision: Significant Modification

This significant modification changes the emission factors for polyester resin products fabrication at the request of the Permittee. The factors have increased and therefore the permitted VOM emissions in Section 5.5 have been increased and the allotment of ATUs in Section 6.8 has been increased. Other changes include a facility name change, addition of particulate filters to chop booths and addition of new module gelcoat booth No. 2 to the permit.

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

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

DES:DWH:jar

cc: Illinois EPA, FOS, Region 1
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance it determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary

Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

National Fiber Glass Products
5 Greenwood Avenue
Romeoville, Illinois 60441
630/257-3300

I.D. No.: 197090AAA
Standard Industrial Classification: 3088, Plastics: Plumbing Fixtures

1.2 Owner/Parent Company

G.K.L. Corporation
5 Greenwood Avenue
Romeoville, Illinois 60441

1.3 Operator

National Fiber Glass Products
5 Greenwood Avenue
Romeoville, Illinois 60441

Gregory S. Salach
630/257-3300

1.4 General Source Description

National Fiber Glass Products is located at 5 Greenwood Avenue, Romeoville in Will County. The source conducts operation for the production of plastic plumbing fixtures. The plant manufactures bath/shower modules, whirlpool baths, related accessories and tooling from unsaturated polyester resin and glass fiber reinforcements by the contact molding method. The fundamental process is the conversion of liquid resins and glass fiber into durable goods.

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 Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
cm	Centimeter
HAP	Hazardous Air Pollutant
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
lb	pound
Mg	Megagram
mmBtu	Million British thermal units
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psi	Pounds per square inch
RMP	Risk Management Plan
SCAQMD	South coast air quality management district
SO_2	Sulfur Dioxide
T	Tons
T1	Title I – identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

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:

Mold Preparation Using Ethyl Acetate
Equipment Cleanup Using Acetone
Glue Station
Finishing Stations
Whirlpool Finishing
Water Coating
Torit Dust Booths

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

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

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	Description	Date Constructed	Emission Control Equipment
Module Gelcoat Booth (XGC) No. 1	Gelcoat Application	November, 1973	Module Gelcoat Filter (MGF)
Module Primary Chop Booth #1 (XPC1)	Resin and Fiberglass Lamination	November, 1973	Particulate Filter
Module Primary Chop Booth #2 (XPC2)	Resin and Fiberglass Lamination	November, 1973	Particulate Filter
Module Secondary Chop Booth (XSC)	Resin and Fiberglass Lamination	November, 1973	Particulate Filter
Mixer Tank #1 (MT-1)	Blending Resin and Fillers	November, 1973	None
Mixer Tank #2 (MT-2)	Blending Resin and Fillers	November, 1973	None
Mixing Tank #3 (MT-3)	Blending Resin and Fillers	November, 1973	None
Mixing Tank #4 (MT-4)	Blending Resin and Fillers	November, 1973	None
Accessory Gelcoat Booth (XGCA)	Gelcoat Application	November, 1973	Accessory Gelcoat Filter (AGF)
Accessory Chop Booth (XCHA)	Resin and Fiberglass Lamination	November, 1973	Accessory Chop Filter (ACF)
Tooling Gelcoat Booth (XGCT)	Gelcoat Application	November, 1973	None
Tooling Chop Booth (XCHT)	Resin and Fiberglass Lamination	November, 1973	Tooling Chop Filter (TCF)
Module Gelcoat Booth No. 2 (CGC2)	Gelcoat Application	June, 1998	Particulate Filter
Module Line Gelcoat Cure Area 1 (XGCC1)	Gelcoat Drying/Curing	November, 1973	None
Module Line Gelcoat Cure Area 2 (XGCC2)	Gelcoat Drying/Curing	June, 1998	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
Module Line Primary Chop Booth Cure Area 1 (XPCC1)	Resin Drying/Curing	November, 1973	None
Module Line Primary Chop Booth Cure Area 2 (XPCC2)	Resin Drying/Curing	November, 1973	None
Module Line Secondary Chop Booth Cure Area (XSCC)	Resin Drying/Curing	November, 1973	None
Accessories Line Gelcoat Booth Cure Are (XGCAC)	Resin Drying/Curing	November, 1973	None
Accessories Line Chop Booth Cure Area (XPCAC)	Resin Drying/Curing	November, 1973	None
Tooling Line Chop Booth Cure Area (XPCTC)	Resin Drying/Curing	November, 1973	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 Applicable Regulations

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

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

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

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

b. i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

iii. All normal traffic pattern roads and parking facilities located at this source shall be

paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

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

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

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 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)	288.94
Sulfur Dioxide (SO_2)	---
Particulate Matter (PM)	0.61
Nitrogen Oxides (NO_x)	8.55
HAP, not included in VOM or PM	---
TOTAL	298.10

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, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

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. Once the ERMS begins, 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 permits. 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 shall 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). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to “emissions excursion compensation,” as described in Condition 6.4.

i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for

such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

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

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover

the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

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

i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and

ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This

report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source’s baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 351 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 39.78 tons.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emission Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and

iii. An emission unit for which a LAER demonstration has been approved by the Agency on or after November 15, 1990.

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

None

b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such

emission unit continues to use such BAT [35 IAC 205.405(b)].

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1

Group 1 Module Gelcoat Booths – For Gelcoat Application
Control Module Gelcoat Filters

Group 2 Module Primary and Secondary Chop Booths – Resin and Fiberglass Lamination

Group 3 Mixer Tanks – Blending Resin and Fillers

Group 4 Accessory Gelcoat Booth – Gelcoat Application
Control Accessory Gelcoat Filter

Group 5 Accessory Chop Booth – Resin and Fiberglass Lamination
Control Accessory Chop Filter

Group 6 Tooling Chop Booth – Resin and Fiberglass Lamination

7.1.1 Description

National Fiber Glass Products conducts operation for the production of plastic plumbing fixtures. The plant manufactures bath/shower modules, whirlpool baths, related accessories and tooling from unsaturated polyester resin and glass fiber reinforcements by the contact molding method. The fundamental process is the conversion of liquid resins and glass fiber into durable goods.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Module Gelcoat Booth (XGC)	Gelcoat Application	Module Gelcoat Filter (MGF)
Module Primary Chop Booth #1 (XPCL)	Resin and Fiberglass Lamination	Particulate Filter
Module Primary Chop Booth #2 (XPC2)	Resin and Fiberglass Lamination	Particulate Filter
Module Secondary Chop Booth (XSC)	Resin and Fiberglass Lamination	Particulate Filter
Mixer Tank #1 (MT-1)	Blending Resin and Fillers	None

Emission Unit	Description	Emission Control Equipment
Mixer Tank #2 (MT-2)	Blending Resin and Fillers	None
Mixing Tank #3 (MT-3)	Blending Resin and Fillers	None
Mixing Tank #4 (MT-4)	Blending Resin and Fillers	None
Accessory Gelcoat Booth (XGCA)	Gelcoat Application	Accessory Gelcoat Filter (AGF)
Accessory Chop Booth (XCHA)	Resin and Fiberglass Lamination	Accessory Chop Filter (ACF)
Tooling Gelcoat Booth (XGCT)	Gelcoat Application	None
Tooling Chop Booth (XCHT)	Resin and Fiberglass Lamination	Tooling Chop Filter (TCF)
Module Gelcoat Booth No. 2 (CGC2)	Gelcoat Application	Particulate Filter
Module Line Gelcoat Cure Area 1 (XGCC1)	Gelcoat Drying/Curing	None
Module Line Gelcoat Cure Area 2 (XGCC2)	Gelcoat Drying/Curing	None
Module Line Primary Chop Booth Cure Area 1 (XPCC1)	Resin Drying/Curing	None
Module Line Primary Chop Booth Cure Area 2 (XPCC2)	Resin Drying/Curing	None
Module Line Secondary Chop Booth Cure Area (XSCC)	Resin Drying/Curing	None
Accessories Line Gelcoat Booth Cure Are (XGCAC)	Resin Drying/Curing	None

Emission Unit	Description	Emission Control Equipment
Accessories Line Chop Booth Cure Area (XPCAC)	Resin Drying/Curing	None
Tooling Line Chop Booth Cure Area (XPCTC)	Resin Drying/Curing	None

7.1.3 Applicability Provisions and Applicable Regulations

a. i. An “affected gelcoat booth” for the purpose of these unit-specific conditions, is any gelcoat booth used for gelcoat application.

ii. An “affected gelcoat cure area” for the purposes of these unit-specific conditions is any area used to dry/cure gelcoat following its application in a gelcoat application booth.

b. i. An “affected chop booth” for the purpose of these unit-specific conditions, is any chop booth used for resin and fiber glass lamination.

ii. An “affected chop cure area” for the purposes of these unit-specific conditions is any area used to dry/cure resin following its application in a resin application booth.

c. An “affected mixer” for the purpose of these unit-specific conditions, is any mixer used for blending resin and fillers.

d. Each affected gelcoat booth, chop booth, cure area and mixer is subject to the emission limits identified in Condition 5.2.2.

e. Each affected gelcoat booth, chop booth, cure area and mixer at the source are subject to 35 IAC 212.321(a), which requires 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 presses shall not exceed the following emission rates specified in the following equation

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

Where:

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

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

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

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

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

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour [35 IAC 212.321].

f. Each affected gelcoat booth, chop booth, cure area and mixer at the source are subject to 35 IAC 218 Subpart G which provides that:

i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.1.3 (f)(ii) (see also 35 IAC 218.302) and the following exception: If no odor nuisance exists the limitation shall apply to photochemically reactive material as defined in 35 IAC 211.4690 [35 IAC 218.301].

ii. Emissions of organic material in excess of those permitted by Condition 7.1.3 (f)(i) (see also 35 IAC 218.301) are allowed if such emissions are controlled by one of the following methods[35 IAC 218.302(b)].

A. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane(molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; or,

B. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere; or,

C. Any other air pollution control equipment approved by the Agency and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the

uncontrolled organic material that would be otherwise emitted to the atmosphere.

g. Each affected gelcoat booth, chop booth, cure area and mixer at the source used for polyester resin product manufacturing process shall comply with the control requirements of 35 IAC 218 Subpart CC which provides that:

i. Every owner or operator of a polyester resin manufacturing process shall comply with any of the following requirements [35 IAC 218.666 (a)(1)]:

1. Use polyester resin material with a monomer content as follows:

A. For polyester resin materials used for products requiring corrosion resistant or fire retardant materials, a monomer content of no more than 48% by weight as applied;

B. For polyester resin materials for products requiring a tensile strength of 10,000 psi or more, including tooling resins, a monomer content of no more than 48% by weight as applied;

C. For clear gel coat, a monomer content of no more than 50% by weight as applied;

D. For other pigmented gel coats, a monomer content of no more than 35% by weight as applied; or

E. For all other polyester resin materials, a monomer content of no more than 35% by weight as applied.

2. Use a closed-mold system or pultrusion system which will result in less than 4% weight loss of polyester resin materials.

3. Use vapor suppressed polyester resin approved by the Illinois EPA in the source's permit such that the weight loss from VOM emissions does not exceed 60 grams per square meter of exposed surface area during molding;

ii. For spraying operations, in addition to the requirements specified in Condition 7.1.3 (f)(i) above, use only high volume low pressure (HVLP), airless, air-assisted airless, or electrostatic spray equipment, except for touch-up and repair using a hand-held, air-atomized spray gun which has a container for polyester resin material as part of the gun [35 IAC 218.666 (a)(2)].

iii. Any owner or operator of a polyester resin products manufacturing process, shall use closed containers for all polyester resin materials, cleaning materials which contain VOM (including waste cleaning materials), and other materials that contain VOM (including waste resin materials) in such a manner as to effectively control VOM emissions to the atmosphere and in accordance with the practices described in a certification pursuant to 35 IAC 218.672(b)(2)(A) [35 IAC 218.666 (b)].

iv. Any owner or operator of a polyester resin products manufacturing process which formulates polyester resin material at the source, shall comply with the following operating requirements [35 IAC 218.266 (c)]:

1. A cover shall be in place on any tank, vat, or vessel with a capacity greater than 7.5 liters (2 gallons), including a container in which polyester resin materials are delivered to the source, while polyester resin materials are being formulated. The cover shall:

A. Completely cover the tank, vat, or vessel opening except for an opening

no larger than necessary to allow for safe clearance for a mixer shaft;

B. Extend at least 1.27 cm (0.5 inch) beyond the outer rim of the opening or be attached to the rim;

C. Remain closed except when adding or removing material or when sampling or inspection procedures require access; and

D. Be maintained in good condition such that, when in place, the cover maintains contact with the rim of the opening for at least 90% of the circumference of the rim.

2. Carry out emissions shall be minimized when a mixer used for formulation of polyester resin material is being removed from a tank, vat, or vessel before the mixer is completely removed from the tank, vat, or vessel.

v. Any owner or operator of polyester resin products manufacturing processes which as a group use more than 4 gallons per day of cleaning materials which contain more than 200 grams of VOM per liter (1.7 pounds per gallon) shall use a solvent recovery system for such materials. Solvent recovery may be done at the source or by using an off-site commercial solvent recovery service. The waste residue from the solvent recovery system located at the source shall not contain more than 20% VOM by weight [35 IAC 218.666 (d)].

7.1.4 Non-Applicability of Regulations of Concern

a. The affected gelcoat booths, chop booths, cure areas and mixers used for polyester resin product manufacturing are not subject to the requirements of 35 IAC 218 Subpart PP, Miscellaneous Fabricated Product Manufacturing Process, pursuant to 35 IAC

218.920 (b)(2) because these affected units are subject to the requirements of 35 IAC 218 Subpart CC.

7.1.5 Control Requirements

The Permittee shall comply with the control requirements for polyester resin product manufacturing process as provided in 35 IAC 218.666. These requirements are included in Condition 7.1.3 (g).

7.1.6 Emission Limitations

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

Emissions and operation of Module Gelcoat Booth No. 2 (CGC2) and Module Gelcoat Cure Area No. 2 shall not exceed the following limits:

Resin/Gelcoat Usage		Total VOM Content		VOM Emissions	
(T/mo)	(T/yr)	(T/mo)	(T/yr)	(T/mo)	(T/yr)
14	164	4.7	54.12	2.1	24.11

These limits are based on maximum resin and gelcoat usage an average emission factor of 294 lb VOM/ton and standard emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the affected gelcoat booth and cure area below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

7.1.7 Testing Requirements

Pursuant to 35 IAC 218.668 (b), when in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with Condition 7.1.3 (f), the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart CC shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.668 as follows:

a. The VOM content of fresh cleaning materials shall be determined from supplier data or by sampling and analysis using EPA reference Method 24, incorporated by reference in 35 IAC 218.112.

b. The VOM content of waste residue from the solvent recovery system shall be determined by sampling and analysis using EPA reference Method 24, incorporated by reference in 35 IAC 218.112.

c. The monomer content of polyester resin materials shall be determined as follows:

i. From supplier data and operating data;

ii. By sampling and analysis by the methods set forth in SCAQMD Method 312-91, incorporated by reference in 35 IAC 218.112; or

iii. By site-specific sampling and analysis methods approved by the Illinois EPA and USEPA in a federally enforceable permit.

d. The weight loss from polyester resin material in a closed-mold system or pultrusion system during molding shall be determined as follows:

i. From supplier data and operating data;

ii. By testing of VOM emissions by the methods set forth in 35 IAC 218.105; or

iii. By material balance as follows: separately weigh the polyester resin materials and the reinforcement materials before they are

introduced into the mold. Weigh the molded product after it has cooled so that it can be manually handled but no sooner than one hour after removal of the product from the mold. The percent weight loss shall be determined according to the following equation:

$$PWL = \frac{[1 - (C-B)] \times 100}{A}$$

Where:

PWL = Percent weight loss;

A = Weight of polyester resin materials;

B = Weight of reinforcement material;

C = Weight of cooled molded product after at least one hour elapsed time.

iv. By site-specific sampling and analysis methods approved by the Illinois EPA and USEPA in a federally enforceable permit.

e. The weight loss from a vapor suppressed polyester resin material square meter of exposed surface area shall be determined as follows:

i. From supplier data and operating data;

ii. By sampling and analysis by the methods set forth in SCAQMD Method 309-91, incorporated by reference in 35 IAC 218.112; or

iii. By site-specific sampling and analysis methods approved by the Illinois EPA and USEPA in a federally enforceable permit.

f. In the event of a difference between data obtained by sampling and analysis and other data, the data from sampling and analysis shall govern.

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected gelcoat booth, chop booth and mixer to demonstrate compliance with Conditions 5.5.1 and 7.1.3, pursuant to Section 39.5(7)(b) of the Act:

a. Pursuant to 35 IAC 218.672 (a)(2), the owner or operator shall collect and record the following information to maintain a complete record of all polyester resin materials which are used by such polyester resin product manufacturing process:

i. The name and identification of each polyester resin material used in the process;

ii. The particular operating requirement with which each polyester resin material will comply, the actual monomer content of the material (percent by weight) and other relevant data to show compliance with the operating requirement, including:

A. For each polyester resin material which is classified as a material used for products requiring corrosion resistant or fire retardant materials, a material used for products requiring tensile strength of 10,000 psi or more, or a clear gel coat, justification for such classification if the material is applied to comply with the monomer content limitation of 35 IAC 218.666 (a)(1)(A)(i), (ii), or (iii) respectively;

B. For each polyester resin material which is applied in a closed-mold or pultrusion system so as to comply with 35 IAC 218.666 (a)(10(B), the weight loss from the polyester resin material (percent by weight) during molding;

C. For each polyester resin material which is vapor suppressed so as to comply with 35

IAC 218.666 (a)(1)(C), the type and content (percent by weight) of catalyst in the material, the maximum process temperature for resin application, the maximum gel time and the weight loss (grams per square meter exposed surface) during molding; and

D. For each polyester resin material which is approved by the Illinois EPA and the USEPA in a federally enforceable permit or as a SIP revision so as to comply with 35 IAC 218.666 (a)(1)(D), information showing the VOM emission level which is achieved and the VOM emissions which would result from compliance with 35 IAC 218.666 (a)(1)(A), (B), or (C).

iii. A description of testing which was performed, in accordance with 35 IAC 218.668, to determine the monomer content of polyester resin materials and the information in 35 IAC 218.672 (a)(1)(C)(ii), (iii) and (iv) and (a)(1)(D), including data, calculations, and descriptions and results of the sampling and analysis that the owner or operator has relied upon to show compliance with 35 IAC 218.666 (a)(1).

iv. The processes and applications for which each polyester resin material may be used in compliance with applicable operating requirements, including:

A. For each polyester resin material which is classified as a material used for products requiring corrosion resistant or fire retardant material or a material used for products requiring tensile strength of 10,000 psi or more which is applied to comply with the monomer content limitations of 35 IAC 218.666 (a)(1)(A)(i) or (ii), respectively, the required products or circumstances for the materials use;

B. For each polyester resin material which is applied in a closed-mold or pultrusion system so as to comply with 35 IAC 218.666 (a)(1)(B), the required process temperature and minimum mold cycle time or maximum pultrusion speed;

C. For each polyester resin material which is vapor suppressed so as to comply with 35 IAC 218.666 (a)(1)(C), the required thickness of the manufactured product, the type and amount of catalyst in the resin, and the maximum process temperature and maximum gel time; and

D. For each polyester resin material which is approved by the Illinois EPA and the USEPA as a SIP revision so as to comply with 35 IAC 218.666 (a)(1)(D), the required process operating conditions or product specifications.

v. For each polyester resin material which is applied in a spraying operation, the type of spray equipment with which the material will be applied so as to comply with 35 IAC 218.666 (a)(2).

b. Pursuant to 35 IAC 218.672 (a)(3), the owner or operator shall collect and record all of the following information for each process:

i. The name, identification number and amount (pound/month) of each polyester resin material applied on each process; and

ii. The specific data identified pursuant to 35 IAC 218.672 (a)(2)(D) to confirm that the polyester resin material was applied in such a manner that it complied with the applicable operating requirement.

c. Pursuant to 35 IAC 218.672 (b)(2), the owner or operator shall collect and record all of the following information:

i. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any;

ii. Information on a daily basis confirming the proper use of a recovery system if one is required or is used, including operation of a recovery system at the source to produce a waste residue that is 20% or less VOM by weight and information identifying any observation of noncompliance; and

iii. Information on a daily basis on the use of cleaning materials which contain more than 200 grams of VOM per liter (1.7 pounds per gallon) if a recovery system is not required or is not used. This information shall include the name, identification number, amount used and VOM content of each such cleaning material.

d. Pursuant to 35 IAC 218.672 (c)(2), the owner or operator shall collect and record all of the following information:

i. The date, time, and duration of scheduled inspections to confirm the proper use and maintenance of covers on vats, vessels, and tanks and proper drainage of mixers and any instance of improper use, with description of actual practice and corrective action taken, if any;

ii. A maintenance log for covers on vats, vessels, and tanks, detailing all routine and non-routine maintenance performed and initial use of new covers, including dates of such activities.

e. The Permittee shall also keep records of the following at the source:

i. Record indicating monomer content (% by weight) in resin and gel coat, and vapor-suppressed and non vapor-suppressed resin or gel coat;

ii. Record indicating VOM and HAP content of any solvent used in the plant;

iii. Usage of resin, gel coat, and solvent (lb/year);

iv. Maximum process weight rate (lb/hr); and

v. The monthly and annual VOM and HAP emissions from the affected gelcoat booths, chop booths and mixers, with supporting calculations.

vi. Daily operating hours.

7.1.10 Reporting Requirements

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

a. The owner or operator shall notify the Illinois EPA of any violation of the requirements of Condition 7.1.3 (f) (see also 35 IAC 218 Subpart CC), by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.672 (a)(4), (b)(3) and (c)(3)].

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

a. For the purpose of estimating VOM emissions from the module gelcoat booth, accessory gelcoat booth, tooling gelcoat booth, module primary and secondary chop booths, accessory chop booth, tooling chop booth and cure areas, the following air emission factors should be used:

	Emission Rate of Pounds of VOM Emitted per Ton of Resin or Gelcoat Processed									
VOM Content in Resin/Gelcoat, %	< 33	33	34	35	36	37	38	39	40	41
Gelcoat Application	0.445 x % VOM[a] x 2000	294	315	336	356	377	398	418	439	460

	Emission Rate of Pounds of VOM Emitted per Ton of Resin or Gelcoat Processed									
VOM Content in Resin/Gelcoat, %	42	43	44	45	46	47	48	49	50	< 50
Gelcoat Application	481	501	522	543	564	584	605	626	646	0.73 x ((1.03646 x % VOM[a]) - 0.195) x 2000

[a] A decimal percent VOM should be used in the equation. For example, use the input value 0.3 for a resin with 30% VOM content by weight.

For gelcoat application 55% of the VOM emission is emitted in the spray booth and 45% in the curing area.

For the chop booths 85% of the VOM emission is emitted in the spray booth and 15% in the curing area.

These are emission factors for uncontrolled polyester resin product fabrication processes, referred to as the United Emission Factors (UEFs) published by the Composite Fabricators Association (CFA).

b. For purposes of determining compliance with 7.1.3(f)(8 lb/hr limit) each gel coat booth, chop booth and cure area is a separate emission unit. Also, since hourly usage may be difficult to determine, monthly usage divided by hours of operation may be used to determine hourly emission rate.

c. For the purpose of estimating particulate matter

emissions from the module gelcoat booth and accessory gelcoat booth at the source, the following engineering estimates should be used:

The maximum overspray is 10% of the non-volatile material

Overspray = (Usage – VOM Emissions) x 10%

100% of the overspray is assumed as uncontrolled particulate matter emissions.

Capture Efficiency of Control Equipment = 86%

Control Efficiency = 95%

Overall Control Efficiency = 82%

Example calculation:

Usage = 1440 lb/hr

VOM Emissions = 220.5 lb/hr

Overspray = (1440 – 220.5) x 10/100 = 121.95

Particulate Matter Emissions = 121.95 (1-0.82) = 21.95 lb/hr.

d. For the purpose of estimating particulate matter emissions from the module primary and secondary chop booths the following emission factor should be used:

0.00164 lb/lb of resin applied.

This factor is obtained from the stack test data collected on a similar chop booth.

For the accessory and tooling chop booths the overall control efficiency of the chop filters is applied, i.e., (0.00164 lb/lb of resin applied) x (1-0.82)

e. The VOM emissions from the mixers shall be calculated based on the following engineering estimates:

(Total Volume of Resin and Filler Throughput) x (Vapor Density of Styrene).

f. Compliance provisions addressing particulate matter limitations for the affected mixers are not set by this permit as compliance is assumed to be achieved by the normal work-practices and maintenance activities inherent in operation of the affected mixers.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after January 25, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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 [Section 39.5(12)(a) of the Act]. 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 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]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

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

8.6.3 Test Reports

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

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company’s representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency (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 South First Avenue
Maywood, Illinois 60153

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

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

   i. At reasonable times, for the purposes of assuring permit compliance; or

   ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; 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

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of

the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the

emission limitations, standards, or regulations in this permit.

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application.

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Summary of Equipment

TABLE 1-1

Unit Number	Date Installed	Emission Unit(S)	Description
1	November, 1973	Module Gelcoat Booth (XGC)	Gelcoat Application Booth Controlled by a Gelcoat Filter
2	November, 1973	Module Primary Chop Booth #1 (XPC1)	Chop Booth for Resin and Fiber Glass Lamination
3	November, 1973	Module Primary Chop Booth #2 (XPC2)	Chop Booth for Resin and Fiber Glass Lamination
4	November, 1973	Module Secondary Chop Booth (XSC)	Chop Booth for Resin and Fiber Glass Lamination
5	November, 1973	Mixing Tank #1 (MT-1)	Mixer for Blending Resin and Fillers
6	November, 1973	Mixing Tank #2 (MT-2)	Mixer for Blending Resin and Fillers
7	November, 1973	Mixing Tank #3 (MT-3)	Mixer for Blending Resin and Fillers
8	November, 1973	Mixing Tank #4 (MT-4)	Mixer for Blending Resin and Fillers
9	November, 1973	Accessory Gelcoat Booth (XGCA)	Gelcoat Booth for Gelcoat Application Controlled by a Filter
10	November, 1973	Accessory Chop Booth (XCHA)	Chop Booth for Resin and Fiber Glass Lamination Controlled by a Filter
11	November, 1973	Tooling Gelcoat Booth (XGCT)	Gelcoat Booth for Gelcoat Application
12	November, 1973	Tooling Chop Booth (XCHT)	Chop Booth for Resin and Fiber Glass Lamination Controlled by a Filter
13	June, 1998	Module Line Gelcoat Booth 2 (CGC2)	Gelcoat Application

Unit Number	Date Installed	Emission Unit(S)	Description
14	November, 1973	Module Line Gelcoat Cure Area 1 (XGCC1)	Gelcoat Drying/Curing
15	June, 1998	Module Line Gelcoat Cure Area 2 (XGCC2)	Gelcoat Drying/Curing
16	November, 1973	Module Line Primary Chop Booth Area 1 (XPCC1)	Resin Drying/Curing
17	November, 1973	Module Line Primary Chop Booth Area 2 (XPCC2)	Resin Drying/Curing
18	November, 1973	Module Line Secondary Chop Booth Cure Area (XSCC)	Resin Drying/Curing
19	November, 1973	Accessories Line Gelcoat Booth Cure Area (XGCAC)	Resin Drying/Curing
20	November, 1973	Accessories Line Chop Booth Cure Area (XPCAC)	Resin Drying/Curing
21	November, 1973	Tooling Line Chop Booth Cure Area (XPCTC)	Resin Drying/Curing

10.2 Attachment 2 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

DWH:jar

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

National Bathing Products is located at 5 Greenwood Avenue, Romeoville in Will County. The source conducts operation for the production of plastic plumbing fixtures. The plant manufactures bath/shower modules, whirlpool baths, related accessories and tooling from unsaturated polyester resin and glass fiber reinforcements by the contact molding method. The fundamental process is the conversion of liquid resins and glass fiber into durable goods.

A CAAPP permit has been issued for this source previously. This significant modification changes the emission factors for polyester resin products fabrication at the request of the Permittee. The factors have increased and therefore the permitted VOM emissions have been increased and the allotment of ATUs in Section 6.8 has been increased. Other changes include a facility name change, addition of particulate filters to chop booths and addition of new module gelcoat Booth No.2 to the permit.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Module Gelcoat Booth (XGC) No. 1	Gelcoat Application	November, 1973	Module Gelcoat Filter (MGF)
Module Primary Chop Booth #1 (XPC1)	Resin and Fiberglass Lamination	November, 1973	Particulate Filter
Module Primary Chop Booth #2 (XPC2)	Resin and Fiberglass Lamination	November, 1973	Particulate Filter
Module Secondary Chop Booth (XSC)	Resin and Fiberglass Lamination	November, 1973	Particulate Filter
Mixer Tank #1 (MT-1)	Blending Resin and Fillers	November, 1973	None
Mixer Tank #2 (MT-2)	Blending Resin and Fillers	November, 1973	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
Mixing Tank #3 (MT-3)	Blending Resin and Fillers	November, 1973	None
Mixing Tank #4 (MT-4)	Blending Resin and Fillers	November, 1973	None
Accessory Gelcoat Booth (XGCA)	Gelcoat Application	November, 1973	Accessory Gelcoat Filter (AGF)
Accessory Chop Booth (XCHA)	Resin and Fiberglass Lamination	November, 1973	Accessory Chop Filter (ACF)
Tooling Gelcoat Booth (XGCT)	Gelcoat Application	November, 1973	None
Tooling Chop Booth (XCHT)	Resin and Fiberglass Lamination	November, 1973	Tooling Chop Filter (TCF)
Module Gelcoat Booth No. 2 (CGC2)	Gelcoat Application	June, 1998	Particulate Filter
Module Line Gelcoat Cure Area 1 (XGCC1)	Gelcoat Drying/Curing	November, 1973	None
Module Line Gelcoat Cure Area 2 (XGCC2)	Gelcoat Drying/Curing	June, 1998	None
Module Line Primary Chop Booth Cure Area 1 (XPCC1)	Resin Drying/Curing	November, 1973	None
Module Line Primary Chop Booth Cure Area 2 (XPCC2)	Resin Drying/Curing	November, 1973	None
Module Line Secondary Chop Booth Cure Area (XSCC)	Resin Drying/Curing	November, 1973	None
Accessories Line Gelcoat Booth Cure Are (XGCAC)	Resin Drying/Curing	November, 1973	None
Accessories Line Chop Booth Cure Area (XPCAC)	Resin Drying/Curing	November, 1973	None
Tooling Line Chop Booth Cure Area (XPCTC)	Resin Drying/Curing	November, 1973	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	288.94
Sulfur Dioxide (SO_2)	---
Particulate Matter (PM)	0.61
Nitrogen Oxides (NO_x)	8.55
HAP, not included in VOM or PM	---
TOTAL	298.10

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board’s emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA’s determination of the source’s baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source’s permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

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