BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

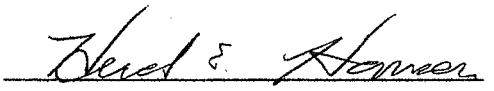
OASIS INDUSTRIES, INC.	)	
	)	
Petitioner,	)	PCB # 04-116
v.	)	(Permit Appeal - Air)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY	)	(90 day extension)
	)	
	)	
Respondent.	)	

NOTICE OF FILING

To:
Ms. Maureen Wozniak
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 N. Grand Ave.
P.O. 19276
Springfield, IL 62794-9276

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the original and nine copies of the PETITION FOR REVIEW OF CAAPP PERMIT, FILING FEE, and APPEARANCE OF HEIDI E. HANSON, a copy of which is hereby served upon you.

Respectfully submitted,



Heidi E. Hanson

Dated - April 2, 2004

Heidi E. Hanson
H. E. Hanson, Esq. P.C.
4721 Franklin Ave, Suite 1500
Western Springs, IL 60558-1720
(708) 784-0624
This filing is submitted on recycled paper.

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached **PETITION FOR REVIEW OF CAAPP PERMIT, FILING FEE, and APPEARANCE OF HEIDI E. HANSON,** by U. S. Mail return receipt requested before 4:30 April 2, 2004, upon the following persons:

Filing Fee, original and nine copies of Petition and Appearance to:

Clerk, Illinois Pollution Control Board
100 W. Randolph Street
State of Illinois Center
Suite 11-500
Chicago, Illinois 60601

one copy of Petition and Appearance to

Ms. Maureen Wozniak
Division of Legal Counsel
Illinois Environmental Protection Agency
1021 N. Grand Ave.
P.O. 19276
Springfield, IL 62794-9276

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	)	
Respondent.	)	

APPEARANCE OF HEIDI E. HANSON

I hereby file my appearance in this proceeding on behalf of Petitioner, Oasis Industries Inc.

Respectfully submitted.

Heidi E. Hanson
on behalf of Oasis Industries, Inc.

Dated: April 2, 2004

Heidi E. Hanson
H. E. Hanson, Esq. P.C.
4721 Franklin Ave, Suite 1500
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY	)	
	)	
Respondent.	)	

PETITION FOR REVIEW OF CAAPP PERMIT

NOW COMES the Petitioner, OASIS INDUSTRIES INC., by and through its attorney Heidi E. Hanson, H. E. Hanson Esq. P.C. and pursuant to Section 40.2 of the Illinois Environmental Protection Act (415 ILCS 5/40.2) and 35 Ill Adm. Code 105 Subpart C, and the Board's Order of January 22, 2004, petitions the Illinois Pollution Control Board for review of the November 26, 2003 Clean Air Act Permit Program ("CAAPP") permit #99090059 issued to Oasis Industries, Inc., and further petitions for a stay of certain conditions of that permit. In support thereof Petitioner states as follows:

Description of the CAAPP Source

Oasis Industries, Inc. ("Oasis") is located in an industrial park in Aurora, Illinois in Kane County. It manufactures bathtubs, whirlpools, tub shower units and shower basins.

Oasis applied for a CAAPP permit on December 4, 1995. A preliminary draft of the CAAPP permit was sent to Oasis on June 3, 1997 and was under review when, in July of 1997, it moved its entire operation from Batavia, also in Kane County, to its current location in Aurora. Oasis followed the Illinois Environmental Protection Agency's instructions regarding transfer of the CAAPP permit application and applying for a current construction and operating permit at the new facility. Oasis made numerous comments on the CAAPP application while it was pending.

The process that was moved involved thermoforming an acrylic sheet into a product, for example a bathtub, then using fiberglass as a reinforcing material, Benzoyl Peroxide (BPO) as a catalyst and styrene as a polymerizing agent. A state operating permit issued July 25, 1997 (# 97070058), allowed it to emit 15.7 tons per year ("tpy") of volatile organic material ("VOM") from two fiberglass resin spray lay-up booths and one gelcoat spray lay-up booth at its Aurora location. The CAAPP permit refers to these original booths as Line #1.

A second permit, #98020084, issued August 31, 1998, allowed Oasis to construct and operate four more booths and to emit an additional 8.8 tpy VOM. The second permit was for a new process which involved applying gelcoat to a mold then adding additional layers of gelcoat for strength. The CAAPP permit refers to the new booths as Line #2.

A detailed description of the process is given in Section 7.1, pages 18 and 19 of the attached CAAPP permit.

IEPA has proposed to issue a permit (# 02090027) for another spray booth. When that permit is granted, Oasis will be permitted to emit a total of 40.5 tons of VOM.

Request and Justification for Review

The "Date Received" listed on page 1 of the permit is incorrect. The IEPA received the permit application for this operation on December 4, 1995.

The "Responsible Official" (Mr. Dale Graham) listed on page 1 of the permit and in section 1.3, page 4, is incorrect. The IEPA was informed at a November 22, 2003 meeting that Mr. Dale Graham had left the company. The Responsible Official should be Mr. William Jahnke.

The reference in condition 3.2.2, page 8, to "266.110" should be to "212.321(c)" to clarify this requirement.

Condition 3.2.3, page 8, states that 35 IAC 218.301 " .. requires that organic material emissions not exceed 8.0 lbs per hour or do not qualify as photochemically reactive material..." This section misstates Board rule 35 IAC 218.301, in that the permit section, as drafted, could be read as requiring that Oasis' organic emissions not be photochemically reactive, whereas the Board rule only states that if emissions are not phototchemically reactive they may be exempted from the 8.0 lbs per hour limit, unless they constitute an odor nuisance. Rule 218.301 is correctly described in condition 7.1.3(b), page 19 of the CAAPP permit.

Condition 4.0, page 9, lists incorrect start up dates for emission units 1, 2 and 3. These emission units were constructed in Batavia in 1995 and moved to Aurora in 1997.

Condition 5.1.1, page 10, states that the source is a major source of VOM. This is incorrect as the permit itself restricts operations to less than 25 tpy of VOM. See condition 7.1.6.

Condition 5.2.5, page 11, incorrectly indicates that 40 CFR Part 63 Subpart WWWW was not yet final on the date of issuance of the permit. It should be revised to reflect the fact that 40 CFR Part 63 Subpart WWWW was adopted on April 21, 2003. 68 Fed. Reg. 19402, April 21, 2003.

Condition 5.2.7, page 12, should be deleted because it is not applicable to Oasis, and 40 CFR Part 64 should be listed under permit section 5.3 as a Non-Applicable Regulation. There are no emission units that are subject to 40 CFR Part 64, Compliance Assurance Monitoring ("CAM rule"). Oasis uses work practices and low VOM emitting materials to comply with applicable VOM limits. The only control equipment that it uses is for particulate control. None of Oasis' units have precontrol device emissions that equal or exceed major source thresholds for particulate matter, as a result the CAM rule is not applicable to Oasis. 40 CFR 64.2(a)(2) and (3). In addition, condition 5.2.7 also incorrectly states that the CAAPP permit was not deemed complete before April 20, 1998. Pursuant to 415 ILCS 5/39.5(5)(f) Oasis' CAAPP application was deemed complete prior to that date.

Condition 5.5.1, page 13, restricts particulate matter to 0.60 tpy. Oasis had requested a limit of 0.88 tpy and there was no justification for denying that request.

Condition 5.6.2(b), page 14, requires that monthly HAP emissions be calculated "as a fraction of VOM emissions according to vapor weight percentage". This calculation procedure reflects Roalt's law and it is not applicable for the type of emission sources at Oasis. Roalt's law assumes that the amount of VOM emitted is roughly proportional to the amount of VOC in liquid. It is appropriate for situations where the VOM is being used as a solvent. In Oasis' case the VOM is part of the chemical reaction because it is being used as a polymerizing agent and therefore Roalt's law (the procedure given in Condition 5.6.2) will yield inaccurate results. HAP emissions should be calculated as described in Condition 7.1.12 using the appropriate UEF and source specific emission factors.

Condition 5.9.1(a), page 15, also uses Roalt's law and is objected to for the reasons set forth in reference to Condition 5.6.2, above.

In condition 7.1.3(d), page 20, the word "which" should be added after "process emission unit" to reflect the language and intent of the rule from which it was derived, 35 IAC 212.321(a).

Condition 7.1.4 should include the provision on nonapplicability of New Source Review that was included in the December 2, 2002 draft permit as draft condition 7.1.4(a). The permit by its terms (condition 7.1.6) limits VOM to below major source levels, therefore New Source Review does not apply.

Condition 7.1.6, page 23, limits VOM emissions from Lines 1 and 2. The only part of this condition that Oasis asks the Board to review are the specific monthly and annual emission limitations for each line. Oasis does not object to the combined limits, although as noted it has a pending permit application for another booth which will increase total emissions from the plant to above 24.5 tpy. By limiting the two lines to the specific amounts, the IEPA is deciding what type of product can be produced. It is forcing Oasis to produce more acrylic bathtubs than gelcoat bathtubs. There is no environmental

justification for this and the individual line limitations are not necessary to comply with the Illinois Environmental Protection Act.

In condition 7.1.9(e)(i), page 28, "on" should be "or" in order to clarify this requirement.

Condition 7.1.12(a), page 31, sets out specific emission factors and then provides that the permittee may use other emission factors if they are approved by the IEPA. In September of 2003, Oasis provided the IEPA with a test report from the CARL laboratory at Purdue University for emissions tests done on Oasis' resin. Their tests determined that 8.545% of the VOM in the resin is emitted during application and curing (8.699% of the styrene is emitted and 5.771% of the vinyl toluene. The permit does not explain whether the emission factor developed as a result of the CARL report is deemed approved for purposes of determining compliance under the permit, therefore it is unclear how compliance with the resin emissions limits is to be determined.

Condition 7.1.12(c), page 31, requires that the monthly material usage be computed by the 15th day of each month. However, 7.1.10(a)(iv) does not require that an exceedence be reported until 30 days after the exceedence. There is no justification for requiring the computations to be done 15 days before the report date. Condition 7.1.12 should be changed to be consistent with 7.1.10(a)(iv) and to allow the full period of time (up to 30 days) to complete the computations.

Condition 7.1.13, page 32, seeks to limit the permit shield in section 8.1 stating that

> "the permittee is not shielded from possible enforcement actions initiated by either USEPA or the Illinois EPA involving the above named emissions units or activities. In addition, compliance with this permit does not serve as proof of compliance for those emissions units or activities."

The section does not specify what emissions units or activities are covered, leading to the possible implication that the condition covers all permitted units or activities and therefore there is no permit shield for any unit or activity. The permit shield limitation as drafted is too broad, arguably goes beyond the points at issue in the violation notice, fails to comply with 415 *ILCS 5/39.5(7)(j), and inappropriately prejudges the outcome of contested alleged violations.*

It should be noted that Oasis does not agree with the Illinois EPA that past New Source Review violations occurred, or that if they did occur they would have any implications for this permit. It is not appropriate to attempt to address such alleged violations through the drafting of a permit. Oasis should be granted a permit shield that covers all emission units and activities excepting only as provided in 415 ILCS 5/39.5(7)(j)(iv)(b) and further excepting that compliance with the CAAPP permit will not be deemed to be compliance with New Source Review and ERMs if, and to the extent of, any violations of those programs that predated the issuance of this permit in the event that

Board orders Oasis to provide offsets for such program as a remedy for the alleged violations.

Petitioner reserves the right to review the permit record and verify that all materials sent to the IEPA and which should appear in the record do in fact appear in the record, including but not limited to filed comments, notes of meetings and telephone conversations, and documents relating to the operation that was moved from Batavia.

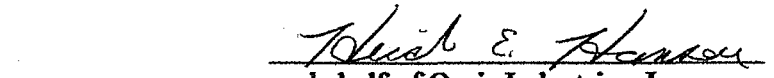
For the above referenced reasons, the contested CAAPP permit conditions are not necessary to accomplish the purposes of the Act or Board regulations, are arbitrary and unnecessary, are beyond the Agency's authority and/ or render certain permit sections ambiguous or internally inconsistent.

WHEREFORE, Petitioner requests that the Board remand this permit to the IEPA and order that it make the changes described above.

FURTHERMORE, pursuant to 35 IAC 105.304(b) Petitioner asks that the Board stay the effectiveness of permit conditions 3.2.3, 5.2.7, 5.6.2(b), 5.9.1(a) and 7.1.12(c) each of which impose requirements not found in previous permits and not supported by the Act or the Board's regulations. Such stay is necessary in order to avert irreparable harm to Petitioner. Such stay will not harm the public or the environment.

Respectfully submitted.

Dated: April 2, 2004



on behalf of Oasis Industries, Inc.

Heidi E. Hanson
H. E. Hanson, Esq. P.C.
4721 Franklin Ave, Suite 1500
Western Springs, IL 60558-1720
(708) 784-0624

217/782-2113

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

PERMITTEE

Oasis Industries, Inc.
Attn: Dale Graham, Vice President of Manufacturing
1600 Mountain Street
Aurora, Illinois 60505

Application No.: 99090059 I.D. No.: 089407AAL
Applicant's Designation: Date Received: September 22, 1999
Operation of: Polyester Resin Product Manufacturing
Date Issued: November 26, 2003 Expiration Date[2]: November 26, 2008
Source Location: 1600 Mountain Street, Aurora, Kane County
Responsible Official: Dale Graham, Vice President of Manufacturing

This permit is hereby granted to the above-designated Permittee to OPERATE a polyester resin product manufacturing facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:JS:psj

cc: Illinois EPA, FOS, Region 1

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

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

TABLE OF CONTENTS

1.0 SOURCE IDENTIFICATION

1.1 Source

Oasis Industries, Inc.
1600 Mountain Street
Aurora, Illinois 60505
630/898-3500

I.D. No.: 089407AAL
Standard Industrial Classification: 3088, Plastics Plumbing Fixtures

1.2 Owner/Parent Company

NAPCOR
1600 Mountain Street
Aurora, Illinois 60505

1.3 Operator

Oasis Industries, Inc.
1600 Mountain Street
Aurora, Illinois 60505

Dale Graham, Vice President of Manufacturing
630/898-3500

1.4 General Source Description

Oasis Industries, Inc. is located at 1600 Mountain Street in Aurora, Illinois. The source manufactures polyester resin plastic products, for example, fiberglass bathtubs. Polyester styrene resins and fiberglass reinforcements are the two major components of the products. The source uses spray booths to mold polyester resins and other raw materials into the desired product.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFA	Composite Fabricators Association
CFR	Code of Federal Regulations
cm	centimeter
Dept.	Department
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft	feet
ft^3	cubic foot
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kW	kilowatts
lb	pound
m	meter
Mg	megagram
min	minute
MMA	methyl methacrylate
mmBtu	Million British thermal units
mo	month
MW	megawatt
N/A	Not applicable
NESHAP	National Emission Standards for Hazardous Air Pollutants
NMMA	National Marine Manufacturers Association
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NVS	non-vapor suppressed
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

PVC	polyvinyl chloride
RMP	Risk Management Plan
SCAQMD	South Coast Air Quality Management District
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
UEF	United Emission Factors
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
VS	vapor suppressant
VSR	vapor suppressed resin
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:

Repair Booth (EV-4)
Bath Shield Spray Booth (EV-5)
Resin/Filler Mix Tank (EV-7)
Tubset Resin/Filler Five Gallon Mixer (EV-8)
Equipment Room Exhaust Fan (EV-9)
Resin Storage Vent Fan (EV-10)
Resin/Filler Mix Tank (EV-15)
Roof Vents

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:

Grinding Booth (EV-6)

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 Compliance with Applicable Requirements

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

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

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

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

3.3 Addition of Insignificant Activities

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

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

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
EV-1	Fiberglass Spray-Up Chop Station #1	1997	Filter
EV-2	Fiberglass Spray-Up Chop Station #2	1997	Filter
EV-3	Fiberglass Spray-Up Chop Station #3	1997	Filter
EV-11	Gelcoat Spray Booth	1998	Filter
EV-12	Skin Coat Spray Booth	1998	Filter
EV-13	Final Coat Fiberglass Spray-Up Booth #13	1998	Filter
EV-14	Final Coat Fiberglass Spray-Up Booth #14	1998	Filter

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

5.2.3 Ozone Depleting Substances

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

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

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

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

5.2.4 Risk Management Plan

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

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

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

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

c. This stationary source will be subject to 40 CFR Part 63, Subpart WWWW, Reinforced Plastic Composites Production, when such rule becomes final and effective. The Permittee shall comply with the applicable requirements of such regulation by the date(s) specified in such regulation and shall certify compliance with the applicable requirements of such regulation as part of the annual compliance certification required by 40 CFR Part 70 or 71

beginning in the year that compliance is required under a final and effective rule.

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. As a result of this application either not having been submitted or deemed complete by April 20, 1998, the source is required to comply with the requirements of 40 CFR Part 64 for large pollutant-specific emissions units in the initial application and CAAPP permit. The source must submit a CAM plan for all other affected pollutant-specific emissions units upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or

modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

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)	24.50
Sulfur Dioxide (SO_2)	---
Particulate Matter (PM)	0.60
Nitrogen Oxides (NO_x)	---
HAP, not included in VOM or PM	---
Total	25.10

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 VOM and HAP Emissions

The Permittee shall maintain records of the following items for the source to quantify annual VOM and HAP emissions, so as to demonstrate compliance with the annual emission limits in Condition 5.5:

a. Aggregate monthly VOM emissions from emission units included in Section 7 of this permit; and

b. Aggregate monthly HAP emissions from emission units included in Section 7 of this permit, calculated as a fraction of VOM emissions according to vapor weight percent.

5.6.3 Records for Operating Scenarios

N/A

5.6.4 Retention and Availability of Records

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

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source. This may be included in the annual emissions report required pursuant to Condition 9.7.

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.

a. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent of each HAP for each organic liquid times the VOM emissions contributed by that organic liquid is acceptable.

5.9.2 Compliance Plan/Schedule of Compliance

To achieve compliance with applicable limitations of this permit, the Permittee shall follow a schedule of compliance consistent with the compliance plan required by Section 39,5(5)(d) of the Act. Such compliance plan shall describe how each emission unit will comply with all applicable requirements. The schedule of compliance as required by Section 39.5(7)(p)(iii) of the Act is in Condition 7.1.13 of this permit.

6.0 EMISSIONS 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 reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. 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 in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable 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 transaction account to cover its actual VOM emissions during the preceding season. A transaction 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 transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction 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 emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 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" (ACMA) (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 permit is issued based on this source's status under the Emissions Reduction Market System (ERMS), 35 IAC Part 205, being resolved as part of an ongoing enforcement inquiry. (See also Condition 7.1.13)

6.3 Recordkeeping and Reporting

a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:

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 actual 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, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Polyester Resin Product Manufacturing

7.1.1 Description

Oasis Industries, Inc., manufactures plastic plumbing fixtures. The manufacturing process is comprised of fiberglass/resin spray lay-up booths with particulate matter filter systems, a gelcoat spray lay-up booth with particulate matter filter system, a grinding booth with a cartridge filter collection system, a curing oven, and associated cleanup operations.

The resin materials used in this industry are generally referred to as thermosetting resins. The thermosetting polyester resins used are complex polymers resulting from the cross-linking reaction of a liquid unsaturated resin with a vinyl type monomer, most commonly styrene or a styrene/methyl methacrylate (MMA) blend used for some gel coats.

Acrylic Process (Line 1)

A thermoform acrylic sheet is clamped into a holding frame and heated to 320-350 °F and then vacuum formed into the shape of a bathtub. After the sheet (shell) has cooled enough to retain its shape, the shell is placed onto a holding fixture and is ready for its coat of polyester resin.

The final layers of fiberglass/resin/filler are sprayed onto the acrylic shell and hand rolled down against the shell. After two-hour cure time for the final coat, the fiberglass re-enforced acrylic shell is removed from its holding fixture and a pre-made leveling base is bonded to the bottom of the tub. After a thirty minute cure time, the tub is moved into the grinding booth and the tub deck is ground to a finished deck height to accommodate standard installation methods as applied in new house construction.

The next work station is a buffing/polishing area where any scratches or defects that may have occurred at one of the previous work stations are fixed. At a drilling station, the proper whirlpool jet hole configuration is drilled through the side wall of the bathtub and hydro jets are installed on the tub. Then the pump and piping to the hydro jets are installed by cutting rigid PVC pipe to proper length and heating to bend into the shape necessary. The last step before crating the whirlpool bathtub for shipment is to water test each tub and final inspect the appearance of the finished product.

Miratec or Gel Coat Process (Line 2)

The Miratec or Gel coat process differs from the Acrylic process in how the outer shell is made. In the Miratec process a gel coat is sprayed onto a form. The gel coat is allowed to cure before the skin and final coats are sprayed on. The grinding and buffing/polishing process to finish the bath fixture is essentially the same as for the Acrylic process and uses the same work stations.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EV-1	Fiberglass Spray-Up Chop Station #1	Filter
EV-2	Fiberglass Spray-Up Chop Station #2	Filter
EV-3	Fiberglass Spray-Up Chop Station #3	Filter
EV-11	Gelcoat Spray Booth	Filter
EV-12	Skin Coat Spray Booth	Filter
EV-13	Final Coat Fiberglass Spray-Up Booth #13	Filter
EV-14	Final Coat Fiberglass Spray-Up Booth #14	Filter

7.1.3 Applicability Provisions and Applicable Regulations

a. The "affected polyester resin product manufacturing processes" for the purpose of these unit-specific conditions, are processes for manufacturing polyester resin plastic products, as described in Conditions 7.1.1 and 7.1.2. Emission Units EV-1, EV-2, and EV-3 constitute Line 1 and emission Units EV-11, EV-12, EV-13, and EV-14 constitute Line 2.

b. The affected polyester resin product manufacturing processes are subject to 35 IAC Section 218.301, which provides that 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 35 IAC 218.302 and with the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.

c. The affected polyester resin product manufacturing processes are subject to 35 IAC 218 Subpart CC: Polyester Resin Manufacturing Process. The requirements of 35 IAC 218 Subpart CC shall apply to a source's polyester resin products manufacturing process emission units and associated handling of materials, cleanup activity, and formulation activity [35 IAC 218.660(a)(2)].

d. The affected polyester resin product manufacturing processes are subject to 35 IAC 212.321, which provides that:

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 (See also Attachment 2) [35 IAC 212.321(a)].

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected polyester resin product manufacturing processes not being subject to 35 IAC 218.204, because the affected polyester resin product manufacturing processes does apply coating to a substrate included in this regulation.

b. This permit is issued based on the affected polyester resin product manufacturing processes not being subject to 35 IAC 218 Subpart PP: Miscellaneous Fabricated Product Manufacturing Process, because the requirements of 35 IAC Subpart PP shall not apply to a source's miscellaneous formulation manufacturing process emission units which are included within the category specified by 35 IAC 218 Subpart CC [35 IAC 218.920(b)(2)].

c. The affected polyester resin product manufacturing processes are not subject to 40 CFR 63, Subparts U and JJJ: National Emission Standards for Hazardous Air Pollutants: Group I and IV Polymers and Resins, because the manufacture of polyester products is not included in these regulations.

7.1.5 Operational And Production Limits And Work Practices

a. Every owner or operator of an affected polyester resin product manufacturing process shall comply with any of the following operating requirements below:

i. 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 [35 IAC 218.666(a)(1)(A)(i)];

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 [35 IAC 218.666(a)(1)(A)(ii)];

C. For clear gel coat, a monomer content of no more than 50% by weight as applied [35 IAC 218.666(a)(1)(A)(iii)];

D. For other pigmented gel coats, a monomer content of no more than 45% by weight as applied [35 IAC 218.666(a)(1)(A)(iv)]; or

E. For all other polyester resin materials, a monomer content of no more than 35% by weight as applied [35 IAC 218.666(a)(1)(A)(v)].

ii. Use any materials or processes that are demonstrated to the satisfaction of the Illinois EPA to achieve VOM emission levels equivalent to any of the above. This alternative must be approved by the Illinois EPA and the USEPA in a federally enforceable permit or as a SIP revision [35 IAC 218.666(a)(1)(D)].

b. For spraying operations, in addition to the requirements specified in Condition 7.1.5(a), 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)].

c. Any owner or operator of an affected polyester resin product 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 the certification pursuant to 35 IAC 218.672(b)(2)(A) [35 IAC 218.666(b)]:

d. Any owner or operator of an affected polyester resin product manufacturing process which formulates polyester resin material at the source shall comply with the following operating requirements:

i. 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 [35 IAC 218.666(c)(1)(A)];

B. Extend at least 1.27 cm (0.5 inch) beyond the outer rim of the opening or be attached to the rim [35 IAC 218.666(c)(1)(B)];

C. Remain closed except when adding or removing material or when sampling or inspection procedures require access [35 IAC 218.666(c)(1)(C)]; 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 [35 IAC 218.666(c)(1)(D)].

ii. 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 containing polyester resin material by allowing the material retained on the mixer blades to drain back into the tank, vat, or vessel before the mixer is completely removed from the tank, vat, or vessel [35 IAC 218.666(c)(2)].

e. Any owner or operator of affected polyester resin product 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 pound 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 a solvent recovery system located at the source shall not contain more than 20% VOM by weight [35 IAC 218.666(d)].

f. The Permittee shall operate, maintain, and replace the filters and bag house in a manner that assures compliance with the conditions of this section. An adequate inventory of spare filters shall be maintained.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected polyester resin product manufacturing processes are subject to the following:

a. Emissions from the affected polyester resin product manufacturing processes shall not exceed the following limits:

	VOM Emissions	
Emission Unit	(Ton/Mo)	(Ton/Yr)
Line 1	1.31	15.70
Line 2	0.74	8.80
Totals	2.05	24.50

These limits are based on emission factors, material usage, and resin VOM content information provided in the construction permit applications for each line.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1R].

The above limitations contain revisions to previously issued Permits 97070058 and 98020084. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of the aforementioned permits. Specifically, the separate emission limits for Line 2 activities were combined into a single emission limit, with no change in the total amount of the limitation. As part of this revision, the associated operating limitations in the aforementioned permits were not transferred into this CAAPP permit. (See also Condition 7.1.13) [T1R].

7.1.7 Testing Requirements

a. Testing Methods

i. The VOM content of fresh cleaning materials shall be determined from supplier data or by sampling and analysis using USEPA Reference Method 24 [35 IAC 218.668(a)(1)].

ii. The VOM content of waste residue from a solvent recovery system shall be determined by sampling and analysis using USEPA Reference Method 24 [35 IAC 218.668(a)(2)].

iii. The monomer content of polyester resin materials shall be determined:

A. From supplier data and operating data [35 IAC 218.668(a)(3)(A)];

B. By sampling and analysis by the methods set forth in SCAQMD Method 312-91 [35 IAC 218.668(a)(3)(B)]; or

C. By site-specific sampling and analysis methods approved by the Illinois EPA and USEPA in a federally enforceable permit [35 IAC 218.668(a)(3)(C)].

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

A. From supplier data and operating data [35 IAC 218.668(a)(5)(A)];

B. By sampling and analysis by the methods set forth in SCAQMD Method 309-91 [35 IAC 218.668(a)(5)(B)]; or

C. By site-specific sampling and analysis methods approved by the Illinois EPA and USEPA in a federally enforceable permit [35 IAC 218.668(a)(5)(C)].

v. In the event of a difference between data obtained by sampling and analysis and other data, the data from sampling and analysis shall govern [35 IAC 218.668(a)(6)].

b. When in the opinion of the Illinois EPA it is necessary to conduct sampling and analysis to demonstrate compliance with 35 IAC 218.668, the owner or operator of a polyester resin products manufacturing process subject to the requirements of 35 IAC 218 Subpart CC, shall at his own expense, conduct such sampling and analysis in accordance with the applicable test methods and procedures specified in 35 IAC 218.668(a) (see also Condition 7.1.7(a)). The Illinois EPA's decision to invoke this subsection may be based on such factors including, but not limited to, a change in operation of the polyester resin products manufacturing process, or a reasonable

belief that a previous test resulted in erroneous data [35 IAC 218.668(b)].

c. Nothing in Condition 7.1.7 shall limit the authority of USEPA pursuant to the Clean Air Act, as amended, to require sampling and analysis [35 IAC 218.688(c)].

7.1.8 Monitoring Requirements

a. The Permittee shall perform scheduled inspections to confirm the proper use of closed containers; covers on vats, vessels, and tanks; and proper drainage of mixers, as required by Conditions 7.1.5(c) and (d).

b. The Permittee shall visually inspect the filters and bag house to check for air flow drop on a regular basis in order to ensure proper operation of the filters and the need for replacement.

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 the affected polyester resin product manufacturing processes to demonstrate compliance with Conditions 5.5.1 and 7.1.5 through 7.1.7, pursuant to Section 39.5(7)(b) of the Act:

a. The owner or operator of an affected polyester resin product manufacturing process shall collect and record the following information to maintain a complete record of all polyester resin materials which are used by such polyester resin products manufacturing process:

i. The name and identification number of each polyester resin material used in the process [35 IAC 218.672(a)(2)(A)];

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 Condition 7.1.5(a)(i)(A),

(B), or (C), respectively [35 IAC 218.672(a)(2)(B)(i)];

B. 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 Condition 7.1.5(a)(ii), information showing the VOM emission level which is achieved and the VOM emissions which would result from compliance with Condition 7.1.5(a)(i) [35 IAC 218.672(a)(2)(B)(iv)].

iii. A description of the testing which was performed, in accordance with Condition 7.1.7, 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 Condition 7.1.5(a)(i) [35 IAC 218.672(a)(2)(C)].

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 limitation of Condition 7.1.5(a)(i)(A) or (B), respectively, the required products or circumstances for the materials' use [35 IAC 218.672(a)(2)(D)(i)];

B. For each polyester resin material which is approved by the Illinois EPA and approved by the USEPA as a SIP revision so as to comply with Condition 7.1.5(a)(ii), the required process operating conditions or product specifications [35 IAC 218.672(a)(2)(D)(iv)].

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 Condition 7.1.5(b) [35 IAC 218.672(a)(2)(E)].

b. The owner or operator of an affected polyester resin product manufacturing process shall collect and record all of the following information each day for each process and maintain the information at the source.

i. The name, identification number and amount of each polyester resin material applied on each process [35 IAC 218.672(a)(3)(A)]; and

ii. The specific data identified pursuant to Condition 7.1.9(a)(iv) to confirm that the polyester resin material was applied in such a manner that it complied with the applicable operating requirement [35 IAC 218.672(a)(3)(B)].

c. The owner or operator of an affected polyester resin product manufacturing process shall collect and record all the following information and maintain the information at the source:

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 [35 IAC 218.672(b)(2)(A)];

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 [35 IAC 218.672(b)(2)(B)]; 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 pound 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 [35 IAC 218.672(b)(2)(C)].

d. The owner or operator of an affected polyester resin product manufacturing process that formulates polyester resin material at the source shall collect

and record all the following information and maintain the information at the source:

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 [35 IAC 218.672(c)(2)(A)]; and

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 [35 IAC 218.672(c)(2)(B)].

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

i. Name or identification number and monomer content (e.g., percent by weight of styrene) of each polyester resin mixture and vapor-suppressed on nonvapor-suppressed resin or gel coat;

ii. VOM content (weight percent) of any solvent and VOM-containing material used in the plant;

iii. Usage of solvents, raw polyester styrene resin or other hybrid resins, and other VOM-containing materials (lb/month and lb/year);

iv. Maximum process weight rate of materials used in the process (lb/hr);

v. Amount of cleanup solvent sent off site for disposal, if credit for emissions reduction is counted (lb/month and lb/year);

vi. The operating schedule of the affected polyester resin product manufacturing processes;

vii. VOM emissions of the affected polyester resin product manufacturing processes (ton/month and ton/year); and

viii. Results of filter inspections and dates of replacements made.

7.1.10 Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected

polyester resin product manufacturing processes 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. The owner or operator of an affected polyester resin product manufacturing process shall notify the Illinois EPA:

i. Of any violation of the operating requirements of 35 IAC 218 Subpart CC by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.672(a)(4)(A)];

ii. Of a violation of the requirements of 35 IAC 218 Subpart CC with respect to handling practices and solvent recovery for cleaning materials by sending a copy of all such records to the Illinois EPA within 30 days following the calendar quarter in which such violation occurred [35 IAC 218.672(b)(3)(A)]; and

iii. Of a violation of the requirements of 35 IAC Subpart CC with respect to formulation of polyester resin material by sending a copy of all such records to the Illinois EPA within 30 days following the calendar quarter in which such violation occurred [35 IAC 218.672(c)(3)(A)].

iv. If there is an exceedance of the requirements of Condition 7.1.5 or 7.1.6 as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, IL, within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

b. The owner or operator of an affected polyester resin product manufacturing process shall notify the Illinois EPA:

i. At least 30 calendar days before changing the method of compliance with the 35 IAC 218 Subpart CC from one operating requirement among Condition 7.1.5(a)(i) to another

operating requirement, of compliance with all requirements of 35 IAC 218.672(a)(1). Upon changing the method of compliance from one operating requirement to another, the owner or operator shall comply with all applicable requirements [35 IAC 218.672(a)(4)(B)];

ii. Within 30 calendar days of changing the handling practices for polyester resin materials, cleaning materials and waste materials or changing source practice with respect to a solvent recovery system for cleaning materials, describing the change [35 IAC 218.672(b)(3)(B)]; and

iii. Within 30 calendar days of changing the handling practices for formulation of polyester resin materials, describing the change [35 IAC 218.672(c)(3)(B)].

c. At least 30 calendar days before changing the method of compliance for an affected polyester resin product manufacturing operation, including the applicable emission factors and calculation methods indicated in Condition 7.1.12, the Permittee shall certify to the Illinois EPA that the polyester resin plastic product manufacturing operation will be in compliance with the applicable limitation of Condition 7.1.6 consistent with the requirements of the compliance certification reports of Condition 9.8.

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 polyester resin product manufacturing process 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:

a. Usage of various resin, gel coat, or solvent materials without exceeding monomer content (% by weight), operational limits, and VOM emission limits in Conditions 5.5.1, 7.1.5, and 7.1.6 and provided that the materials are tested in accordance with the conditions of this section.

b. The Permittee is authorized to relocate emission units and parts of emission units to any location within the permitted source. Notwithstanding Condition 9.11, the Permittee may temporarily remove emission units or parts of emission units from the permitted source for purposes of maintenance, repair,

and testing without voiding the permit for the operation or activity.

7.1.12 Compliance Procedures

Compliance with the limitations of this Section shall be determined by the recordkeeping requirements in Condition 7.1.9 and the emission calculation methodology described below:

a. Emissions of VOM from monomer contained in resin and/or gel coat:

Monomer Emission (lb) = Material usage (ton) * Σ UEF (lb/ton)

Where:

Σ UEF = The sum of all Unified Emission Factors for all monomers present in the material.

The Unified Emission Factors (UEF), listed in Attachment 3, are from "Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (CFA, April 1999). Emissions shall be based on the actual monomer content and application method of the material. Monomer content includes the monomer content as supplied plus any extra monomer added by the operator, but before the addition of other additives such as powders and fillers. The Permittee may use other emission factors or data from source-specific testing if approved by the Illinois EPA.

b. Emissions from solvent usage (e.g., cleaning materials):

VOM Emissions (lb) = Solvent Usage (gal) * Solvent Density (lb/gal) - Solvent Sent Off Site for Disposal (lb)

c. Compliance with the annual usage and VOM limitations in Conditions 7.1.5 and 7.1.6 shall be determined as follows: Compute the weight of each material (e.g., raw resin or gelcoat) used each month by the 15th of the following month. By the 15th of each month, add the monthly material usage used for the 12 previous months to obtain the annual usage of each material. Annual emissions shall be determined as the sum of the products of monthly emission rates for each resin and gelcoat, as determined above, and the hours of operation over a consecutive 12 month period. For purposes of calculating emission, the Permittee may use the procedures above for any portion of the 12

month period that occurred prior to the issuance of this permit.

d. Compliance with the VOM emission limit in Condition 7.1.3(b) shall be determined by the maximum process weight rate (lb/hr) of VOM-containing materials and the emission determination methods of 7.1.12(a) and (b).

e. Compliance with the operational and control requirements Condition 7.1.3(c) and 7.1.5 shall be determined by the recordkeeping and reporting requirements in Conditions 7.1.9 and 7.1.10.

f. Compliance with the PM emission limits in Condition 7.1.3(d) is assured and achieved by the proper operation and maintenance of the filters and bag house as required by Conditions 7.1.5 and 7.1.8 and the work-practices inherent in the operation of an affected polyester resin product manufacturing process.

7.1.13 Compliance Plan/Schedule of Compliance

a. The Permittee was sent Violation Notice A-2002-00343 by the Illinois EPA for, among other things, allegedly failing to comply with the limits in Permits 97070058 and 98020084, and the applicable provisions of 35 IAC Part 203, Major Stationary Sources Construction and Modification, and 35 IAC Part 205, Emissions Reduction Market System (ERMS), for the affected polyester resin product manufacturing processes. As these applicable requirements are not included in this permit and cannot be included until the alleged violations are resolved, the permit shield in Condition 8.1 does not apply and the Permittee is not shielded from possible enforcement actions initiated by either USEPA or the Illinois EPA involving the above named emission units or activities. In addition, compliance with this permit does not serve as proof of compliance for these emission units or activities.

b. The Permittee shall comply with the following schedule of compliance to address compliance with the alleged violations of 35 IAC Parts 203:

Milestone	Timing

Milestone	Timing
Submit a proposal and schedule for achieving compliance with New Source Review	No later than any schedule established pursuant to resolution of the pending enforcement action pertaining to the alleged violations
Achieve full compliance with the requirements of New Source Review following issuance of the requisite permit(s)	No later than any schedule established pursuant to resolution of the pending enforcement action pertaining to the alleged violations

c. The Permittee shall continue to pursue its status as a participating source under the ERMS with an allocation of Allotment Trading Units (ATUs). The Permittee shall promptly supply any information requested by the Illinois EPA to support processing of its ERMS application filed on January 21, 2003, until and unless an appropriate request for revision to this permit is submitted that would result in the source no longer being subject to requirements to hold and retire ATUs for its seasonal VOM emissions, pursuant to 35 IAC Part 205.

d. Submittal of Progress Reports

A Progress Report shall be submitted every six months, beginning six months from the date of issuance of this permit and ending upon the achievement of compliance. The Progress Report shall contain at least the following:

i. The required timeframe for achieving the milestone or action, and actual dates when such milestone or action is achieved.

ii. An explanation of why any required timeframe was not met, and any preventive or corrective measures adopted.

e. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such outstanding issue (e.g., include a new compliance schedule, identify appropriate applicable requirements, establish new requirements).

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 December 11, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

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

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

ii. Illinois EPA - Air Regional Field Office

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

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

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

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

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

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

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

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

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

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

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

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

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

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

9.14 Permit Expiration and Renewal

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

10.2 Attachment 2 - Particulate Matter Emissions from Process Emission Units

10.2.1 Section 212.321 - Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972.

a. Except as further provided in 35 IAC Part 212, 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 which, 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 this Section.

b. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

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

Where:

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

i. Up to process weight rates of 408 Mg/hr (450 Ton/hr):

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

ii. For process weight rate greater than or equal to 408 Mg/hr (450 Ton/hr):

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

c. Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14,1972

Metric		English	
P Mg/hr	E kg/hr	P Ton/hr	E lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

Where:

P = Process weight rate in Mg/hr or Ton/hr, and
E = Allowable emission rate in kg/hr or lbs/hr.

10.3 Attachment 3 - Emissions from Polyester Resin Product Fabrication Processes

These tables are the United Emission Factors (UEF) from "Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (CFA, April 1999). If there are any updates to this document, the updated factors may be used.

Table 1 - Emission Rate in Pounds of Monomer Emitted per Ton of Resin or Gelcoat Processed

Styrene Content (%)[1]	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
Application Method																		
Manual[2,4]	83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180
Mechanical Atomized[3,5]	111	126	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354
Mechanical Atomized Controlled Spray[3,5]	86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273
Mechanical Non-Atomized[3,5]	71	74	77	80	83	86	89	93	96	99	102	105	108	111	115	118	121	124
Filament	122	127	133	138	144	149	155	160	166	171	177	182	188	193	199	204	210	215
Filament with VSR	79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	136	140
Gelcoat	294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646
Gelcoat Controlled Spray	215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472
MMA Content (%)[1]	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Application Method																		
Gelcoat	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	240	225	270

1 For styrene contents less than 33% or greater than 50% and for MMA contents greater than 18%, refer to Table 2.

2 For Vapor Suppressed Resin (VSR), multiply the UEF from the table above by (1 - (0.5 * specific VSR reduction factor)) to obtain the correct emission factor. The VSR reduction factor is based on testing of the specific resin/suppressant formulation.
3 For VSR, multiply the UEF from the table above by (1 - (0.45 * specific VSR reduction factor)) to obtain the correct emission factor. The VSR reduction factor is based on testing of the specific resin/suppressant formulation.

4 For processes using covered curing after roll-out, multiply the UEF from the table above by 0.8 to obtain the correct emission factor. For Processes using covered curing without roll-out, multiply the UEF from the table above by 0.5 to obtain the correct emission factor.

5 For processes using covered curing after roll-out, multiply the UEF from the table above by 0.85 to obtain the correct emission factor. For Processes using covered curing without roll-out, multiply the UEF from the table above by 0.55 to obtain the correct emission factor.

Table 2 - Emission Rate Equation Variables[1]

Application Method	Monomer	A_1	B_1	C_1	A_2	B_2	C_2
Manual	Styrene	1	0.126	0	1	0.286	0.0529
Mechanical Atomized	Styrene	1	0.169	0	1	0.714	0.18
Mechanical Atomized Controlled Spray	Styrene	1	0.13	0	0.77	0.714	0.18
Mechanical Non-Atomized	Styrene	1	0.107	0	1	0.157	0.0165
Filament Application	Styrene	1	0.184	0	1	0.2746	0.0298
Filament Application with VSR	Styrene	1	0.12	0	0.65	0.2746	0.0298
Gelcoat Application	Styrene	1	0.445	0	1	1.03646	0.195
Gelcoat Controlled Spray Application	Styrene	1	0.325	0	0.73	1.03646	0.195
Gelcoat Application	Methyl Methacrylate	1	0.75	0	1	0.75	0

[1] These variables and the equation below shall be used for monomer contents above or below the values included in Table 1. Variables A_1, B_1, and C_1 are used for monomer contents less than 33%. Variables A_2, B_2, and C_2 are used with monomer contents greater than or equal to 33%.

$$UEF = A * (B * \text{Monomer Content} - C) * 2000$$

Where Monomer Content is in weight percent (e.g., for a monomer content of 40%, use 0.40)