BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	R11-23
REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) FOR VOLATILE ORGANIC MATERIAL EMISSIONS FROM GROUP II AND GROUP IV CONSUMER & COMMERCIAL PRODUCTS: PROPOSED AMENDMENTS TO 35 ILL. ADM. CODE 211, 218, and 219	)	(Rulemaking-Air)

NOTICE

To: John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the POST-HEARING COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: Dana Vetterhoffer
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: May 16, 2011

1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

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POST-HEARING COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

The ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA" or "Agency"), by its attorney, hereby submits its post-hearing comments in the above rulemaking proceeding.

PII and SGIA Comments

On April 15, 2011, the Printing Industry of Illinois/Indiana Association and the Specialty Graphic Imaging Association ("PII/SGIA") submitted comments to the Board, suggesting several revisions to the Agency's proposal. On April 25, 2011, the Illinois EPA filed a Motion to Amend Rulemaking Proposal ("Motion to Amend"), which addressed two of PII/SGIA's comments regarding testing requirements for lithographic printers that employ add-on control devices, set forth in Section 218/219.409(a). (In the Motion to Amend, the Illinois EPA opposed PII/SGIA's request that Section 218/219.409(a) be amended to eliminate testing requirements for printing lines that have previously conducted testing, as the USEPA requires the testing language contained in the Motion to Amend. The Illinois EPA also opposed PII/SGIA's request to increase the amount of time sources are given to perform testing. The Illinois EPA explained that 90 days has been the standard for many years, and PII/SGIA provided no compelling reason to double the time frame to 180 days. Further, it is unclear whether this change would be

acceptable to the USEPA.) The Illinois EPA's responses to PII/SGIA's remaining comments are set forth below.

First, PII/SGIA requests that cleaning of substrates prior to screen printing be added to the list of exemptions in Section 218/219.187(a)(2)(A). The Illinois EPA submitted PII/SGIA's proposed revision to the USEPA. USEPA indicated that there is not currently a sufficient basis for the exemption, and requested additional information in order to further evaluate the proposed amendment. The Illinois EPA communicated this request to PII/SGIA, and understands that PII/SGIA is in the process of responding. To date, however, the Illinois EPA has not received a response. Unless and until PII/SGIA submits the requested information and the USEPA approves the amendment, the Illinois EPA opposes adding the exemption.

Next, PII/SGIA requests that the exemption set forth in Section 218/219.187(a)(2)(C)(xiv) regarding cleaning of metering rollers, dampening rollers, and printing plates be removed to avoid confusion. The Illinois EPA indicated at hearing that it would likely agree, but since that time, the Agency was contacted by another industry group that may oppose such a change. The Illinois EPA needs to work with the other group and USEPA to determine the proper course of action, and thus does not have a specific response to this issue at the present time.

PII/SGIA requests that Section 218/219.187(a)(2)(C) be amended to exclude cleaning operations listed in such subsection from recordkeeping obligations. The USEPA has advised, however, that exempting such cleaning operations from the recordkeeping requirements in subsection (e) is not acceptable. USEPA further advised that sources with cleaning operations subject to subsections (a)(2)(C)(v) and (a)(2)(C)(xiii) must comply with the additional recordkeeping/reporting requirements set forth in Section 218/219.187(e)(7) of the Illinois

EPA's proposal. Given the USEPA's position, the Illinois EPA strongly opposes PII/SGIA's proposed changes, as the USEPA could once again disapprove this rule if such changes are made.

PII/SGIA requests that Section 218/219.187(e) be revised to include a fifty percent retention factor for cleaning solvents that have a vapor pressure of 10 mm Hg or less and that are kept in closed containers. The Illinois EPA does not object to this revision, but recommends that it be included in a different subsection, as set forth below. The USEPA has advised that the revision is acceptable, provided that the language clarifies that sources must demonstrate that the vapor pressure falls below the specified threshold. The Illinois EPA therefore recommends the following amendments:

Section 218.187 Other Industrial Solvent Cleaning Operations

e) Recordkeeping and Reporting Requirements

1) The owner or operator of a source exempt from the limitations of this Section because of the criteria in Section 218.187(a)(1) of this Subpart shall comply with the following:

A) By January 1, 2012, or upon initial start-up of the source, whichever is later, submit a certification to the Agency that includes:

i) A declaration that the source is exempt from the requirements of this Section because of the criteria in Section 218.187(a)(1);

ii) Calculations that demonstrate that combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in subsection (a)(2) of this Section, never equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment. An emission adjustment factor of 0.50 shall be used in calculating emissions from used shop towels if the VOM composite vapor pressure of each associated cleaning solution is demonstrated to be less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in

closed containers. For cleaning solutions with VOM composite vapor pressures of equal to or greater than 10 mmHg measured at 20°C (68°F) and for shop towels that are not kept in closed containers, no emission adjustment factor shall be used;

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A) By January 1, 2012, or upon initial start-up of the source, whichever is later, submit a certification to the Agency that includes:

i) A declaration that the source is exempt from the requirements of this Section because of the criteria in Section 219.187(a)(1);

ii) Calculations that demonstrate that combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in subsection (a)(2) of this Section, never equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment. An emission adjustment factor of 0.50 shall be used in calculating emissions from used shop towels if the VOM composite vapor pressure of each associated cleaning solution is demonstrated to be less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in closed containers. For cleaning solutions with VOM composite vapor pressures of equal to or greater than 10 mmHg measured at 20°C (68°F) and for shop towels that are not kept in closed containers, no emission adjustment factor shall be used;

Finally, PII/SGIA requests that Section 218/219.411(b)(1)(F) be amended to remove certain recordkeeping requirements contained in the Illinois EPA's proposal. Specifically, PII/SGIA recommends deleting the requirement that sources' material use records include the name, identification number, and VOM content of each cleaning solvent and fountain solution

additive used per calendar month. The USEPA, however, has indicated that these records are required in order to determine whether the material use thresholds are exceeded. (See USEPA's letter to the Agency, dated March 7, 2011, and submitted to the Board on April 14, 2011, as an Exhibit to the Testimony of David Bloomberg and Testimony of Yoginder Mahajan.) As the USEPA mandated these recordkeeping requirements, the Illinois EPA opposes PII/SGIA's proposed deletion.

Emission Adjustment Factor for Lithographic Printers

The addition of an emission adjustment factor for cleaning materials in Section 218/219.187 is based upon a similar provision in the existing rule for lithographic printing operations. To remain consistent with the language recommended by the Illinois EPA above for industrial cleaning solvents, and in compliance with a recommendation by the USEPA, the Illinois EPA proposes amending Section 218/219.411(b)(1) and (2) to specify that lithographic printing sources wishing to utilize the emission adjustment factor for cleaning materials must demonstrate that the vapor pressure falls below the specified threshold:

Section 218.411 Recordkeeping and Reporting for Lithographic Printing

b) Exempt Units on and after August 1, 2010

1) Lithographic Printing Lines Exempt pursuant to Section 218.405(c)(2)
.....

B) Calculations that demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source do not equal or exceed 6.8 kg/day (15 lbs/day), before the use of capture systems and control devices, as follows:

i) To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the

lithographic printing lines) and divide this amount by the number of days during that calendar month that lithographic printing lines at the source were in operation;

ii) To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the test methods and procedures set forth in Section 218.409(c) of this Subpart shall be used;

iii) To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an impervious substrate. For impervious substrates such as metal or plastic, no emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines; and

iv) To determine VOM emissions from cleaning solutions used on lithographic printing lines at the source, an emission adjustment factor of 0.50 shall be used in calculating emissions from used shop towels if the VOM composite vapor pressure of each associated cleaning solution is demonstrated to be less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in closed containers. For cleaning solutions with VOM composite vapor pressures of equal to or greater than 10 mmHg measured at 20°C (68°F) and for shop towels that are not kept in closed containers, no emission adjustment factor is used;

.....

2) Heatset web offset lithographic printing lines exempt pursuant to Section 218.405(c)(1) but not exempt pursuant to Section 218.405(c)(2).

.....

B) Calculations that demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 45.5 kg/day (100 lbs/day) before the use of capture systems and control devices, as follows (the following methodology shall also be used

to calculate whether a source exceeds 45.5 kg/day (100 lbs/day) for purposes of determining eligibility for the exclusions set forth in Section 218.415(c)(3), in accordance with Sections 218.411(g)(2)(A)(i):

i) To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that lithographic printing lines at the source were in operation;

ii) To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the test methods and procedures set forth in Section 218.409(c) of this Subpart shall be used;

iii) To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an impervious substrate. For impervious substrates such as metal or plastic, no emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines;

iv) To determine VOM emissions from cleaning solvents used on lithographic printing lines at the source, an emission adjustment factor of 0.50 shall be used in calculating emissions from cleaning solution in shop towels if the VOM composite vapor pressure of such cleaning solution is demonstrated to be less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in closed containers. For cleaning solutions with VOM composite vapor pressures of equal to or greater than 10 mmHg measured at 20°C (68°F) and for

shop towels that are not kept in closed containers, no emission adjustment factor is used;

Section 219.411 Recordkeeping and Reporting for Lithographic Printing

b) Exempt Units on and after August 1, 2010

1) Lithographic Printing Lines Exempt pursuant to Section 219.405(c)(2) .....

B) Calculations that demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source do not equal or exceed 6.8 kg/day (15 lbs/day), before the use of capture systems and control devices, as follows:

i) To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that lithographic printing lines at the source were in operation;

ii) To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the test methods and procedures set forth in Section 219.409(c) of this Subpart shall be used;

iii) To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an impervious substrate. For impervious substrates such as metal or plastic, no emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines; and

iv) To determine VOM emissions from cleaning solutions used on lithographic printing lines at the source, an emission adjustment factor of 0.50 shall be used in calculating

emissions from used shop towels if the VOM composite vapor pressure of each associated cleaning solution is demonstrated to be less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in closed containers. For cleaning solutions with VOM composite vapor pressures of equal to or greater than 10 mmHg measured at 20°C (68°F) and for shop towels that are not kept in closed containers, no emission adjustment factor is used;

.....

2) Heatset web offset lithographic printing lines exempt pursuant to Section 219.405(c)(1) but not exempt pursuant to Section 219.405(c)(2).

.....

B) Calculations that demonstrate that combined emissions of VOM from all lithographic printing lines (including inks, fountain solutions, and solvents used for cleanup operations associated with the lithographic printing lines) at the source never exceed 45.5 kg/day (100 lbs/day) before the use of capture systems and control devices, as follows (the following methodology shall also be used to calculate whether a source exceeds 45.5 kg/day (100 lbs/day) for purposes of determining eligibility for the exclusions set forth in Section 219.405(c)(3), in accordance with Section 219.411(g)(2)(A)(i)):

i) To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from all lithographic printing lines at the source (including solvents used for cleanup operations associated with the lithographic printing lines) and divide this amount by the number of days during that calendar month that lithographic printing lines at the source were in operation;

ii) To determine the VOM content of the inks, fountain solution additives and cleaning solvents, the test methods and procedures set forth in Section 219.409(c) of this Subpart shall be used;

iii) To determine VOM emissions from inks used on lithographic printing lines at the source, an ink emission adjustment factor of 0.05 shall be used in calculating emissions from all non-heatset inks except when using an impervious substrate, and a factor of 0.80 shall be used in calculating emissions from all heatset inks to account for VOM retention in the substrate except when using an

impervious substrate. For impervious substrates such as metal or plastic, no emission adjustment factor is used. The VOM content of the ink, as used, shall be multiplied by this factor to determine the amount of VOM emissions from the use of ink on the printing lines;

iv) To determine VOM emissions from cleaning solvents used on lithographic printing lines at the source, an emission adjustment factor of 0.50 shall be used in calculating emissions from cleaning solution in shop towels if the VOM composite vapor pressure of such cleaning solution is demonstrated to be less than 10 mmHg measured at 20°C (68°F) and the shop towels are kept in closed containers. For cleaning solutions with VOM composite vapor pressures of equal to or greater than 10 mmHg measured at 20°C (68°F) and for shop towels that are not kept in closed containers, no emission adjustment factor is used;

Pleasure Craft Surface Coatings

On May 6, 2011, the American Coatings Association ("ACA") prefiled testimony with the Board, requesting revisions to certain definitions applicable to pleasure craft surface coatings, higher VOM limits for certain subcategories of pleasure craft coatings, and a "small container exemption." The Illinois EPA submitted the ACA's testimony to the USEPA.

The USEPA advised that inclusion of a small container exemption in Section 218/219.208, as set forth below, is acceptable. Likewise, USEPA indicated that the ACA's proposed revision to the definition of "extreme high gloss coating," which was proposed by the Agency in its Motion to Amend, is acceptable as well. USEPA advised that the ACA's proposed revision to the definition of "pretreatment wash primer" might be acceptable, but the USEPA needs more information regarding how the revision will impact VOM emissions. The Illinois EPA intends to work with the ACA and USEPA regarding this issue.

Finally, the USEPA indicated that the VOM limitations for pleasure craft surface coatings can be amended as set forth below, provided that the existing emissions averaging

alternative for such coatings is eliminated. The averaging alternative was intended to satisfy the pleasure craft coating industry's need for higher emission limitations. If higher limits are instead implemented, there is no further need for an averaging option. The regulation may therefore contain either higher VOM limits or emissions averaging, but not both. Based on subsequent discussions with the ACA, in which the ACA expressed a preference for higher VOM limitations, the Illinois EPA proposes eliminating the emissions averaging alternative and amending certain limits, as follows:

Part 218:

Section 218.204 Emission Limitations

q) Miscellaneous Metal Parts and Products Coatings and Plastic Parts and Products Coatings On and After May 1, 2012.

.....

5) Pleasure Craft Surface Coatings

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	Extreme high gloss coating – topcoat	0.60~~0.49~~ (5.0)~~(4.1)~~	1.88~~1.10~~ (15.6)~~(9.2)~~
B)	High gloss coating – topcoat	0.42 (3.5)	0.80 (6.7)
C)	Pretreatment wash primer	0.78 (6.5)	6.67 (55.6)
D)	Finish primer/surfacer	~~0.42~~ ~~(3.5)~~	~~0.80~~ ~~(6.7)~~
	Prior to January 1, 2014:	0.60 (5.0)	1.88 (15.6)
	On and after January 1, 2014:	0.42 (3.5)	0.80 (6.7)
E)	High build primer/surfacer	0.34 (2.8)	0.55 (4.6)

F)	Aluminum substrate antifoulant coating	0.56 (4.7)	1.53 (12.8)
G)	Other substrate antifoulant coating	0.400.33 (3.3)(2.8)	0.730.53 (5.8)(4.4)
H)	Antifouling Sealer/Tie Coat	0.42 (3.5)	0.80 (6.7)
IH)	All other pleasure craft surface coatings for metal or plastic	0.42 (3.5)	0.80 (6.7)

Section 218.207 Alternative Emission Limitations

a) Any owner or operator of a coating line subject to Section 218.204 of this Subpart, except coating lines subject to Section 218.204(q)(6), may comply with this Section, rather than with Section 218.204 of this Subpart, if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with subsections (c), (d), (e), (f), (g), (h), (i), (j), (k), (l), (m), or (n) of this Section (depending upon the source category) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in Section 218.105 of this Part and the recordkeeping and reporting requirements specified in Section 218.211(e) of this Subpart; and the control device is equipped with the applicable monitoring equipment specified in Section 218.105(d) of this Part and the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use. A capture system and control device, which does not demonstrate compliance with subsection (c), (d), (e), (f), (g), (h), (i), (j), (k), (l), (m), or (n) of this Section may be used as an alternative to compliance with Section 218.204 of this Subpart only if the alternative is approved by the Agency and approved by the USEPA as a SIP revision. ~~The owner or operator of a pleasure craft surface coating operation subject to Section 218.204(q)(5)(A) through (G) of this Subpart may also comply with subsection (o) of this Section, rather than with Section 218.204 of this Subpart.~~

.....

~~o) Emissions Averaging Alternative for Pleasure Craft Surface Coating Operations. The owner or operator of a source with coating operations subject to the requirements of Section 218.204(q)(5)(A) through (G) may elect to include such operations in the emissions averaging alternative. Coating operations utilizing this alternative shall comply with a source-specific VOM emission limit on a 12-~~

month rolling average basis, calculated at the end of each calendar month. Subject coating operations that do not utilize the emissions averaging alternative, and coating operations subject to Section 218.204(q)(5)(H), shall comply with the requirements in Section 218.204(q)(5) or 218.205, or subsection (n) of this Section, as applicable, as well as with all other applicable requirements in this Subpart.

1) The total actual VOM emissions determined by Equation 2 shall be equal to or less than the total allowable VOM emissions determined by Equation 1. The owner or operator of a source subject to this subsection (o) shall use Equation 1 to determine the total allowable source-specific VOM mass emission limit for pleasure craft coatings included in the emissions average:

Equation 1:

$$VOM_{Allowable} = \sum_{i=A}^{G} LIM_i V_i$$

where:

$VOM_{Allowable}$ = Total allowable mass of VOM that can be emitted from the pleasure craft coating operations included in the average, expressed in kilograms per 12-month period.

LIM_i = The applicable VOM content limit for a specified pleasure craft coating category from Section 218.204(q)(5)(A) through (G), expressed in kilograms per liter.

V_i = Volume of specified pleasure craft coating category from Section 218.204(q)(5)(A) through (G) used in the past 12 months, excluding water and any compounds that are exempt, expressed in liters.

i = Subscript denoting a specific pleasure craft coating category from Section 218.204(q)(5)(A) through (G).

2) At the end of the first 12-month averaging period, and at the end of each subsequent month, the owner or operator of a source subject to this subsection (o) shall use Equation 2 to calculate the total actual VOM emissions from the pleasure craft coating operations included in the emissions average.

Equation 2:

$$VOM_{Actual} = \sum_{i=A}^{G} VOM_i V_i$$

where:

VOM_{Actual} = VOM emissions calculated using the VOM content for all coatings from Section 218.204(q)(5)(A) through (G) that are included in the average and the volume of those coatings used, expressed in kilograms.

VOM_i = Weighted average of actual VOM content for a specified pleasure craft coating category from Section 218.204(q)(5)(A) through (G), expressed in kilograms per liter.

V_i = Total volume of specified pleasure craft coating category from Section 218.204(q)(5)(A) through (G) used in the past 12 months, excluding water and any compounds that are exempt, expressed in liters.

i = Subscript denoting a specific pleasure craft coating category from Section 218.204(q)(5)(A) through (G).

3) For purposes of Equation 2, the owner or operator of a source subject to this subsection (o) shall use Equation 3 to calculate the weighted average VOM content for each coating included in the emissions average for the previous 12 months.

Equation 3:

$$VOM_i = \frac{\sum_{j=1}^{n} VOM_j V_j}{\sum_{j=1}^{n} V_j}$$

where:

VOM_i = Weighted average of actual VOM content for a specified pleasure craft coating category from Section 218.204(q)(5)(A) through (G), expressed in kilograms per liter.

~~VOM_j = VOM content of each pleasure craft coating used over the previous 12 months within a specific pleasure craft coating category, i.~~

~~V_j = Volume of each pleasure craft coating used in the previous 12 months, excluding water and any compounds that are exempt, within a specific pleasure craft coating category, i.~~

~~i = Subscript denoting a specific pleasure craft coating category from Section 218.204(q)(5)(A) through (G).~~

~~j = Subscript denoting a specific pleasure craft coating within a specified coating category, i.~~

~~n = Number of coatings applied within a specific coating category, i.~~

Section 218.208 Exemptions from Emission Limitations

a) Exemptions for all coating categories except wood furniture coating. The limitations of this Subpart shall not apply to coating lines within a source, that otherwise would be subject to the same subsection of Section 218.204 (because they belong to the same coating category, e.g., can coating), provided that combined actual emissions of VOM from all lines at the source subject to that subsection never exceed 6.8 kg/day (15 lbs/day) before the application of capture systems and control devices. (For example, can coating lines within a source would not be subject to the limitations of Section 218.204(b) of this Subpart if the combined actual emissions of VOM from the can coating lines never exceed 6.8 kg/day (15 lbs/day) before the application of capture systems and control devices.) Prior to May 1, 2012, volatile organic material emissions from heavy off-highway vehicle products coating lines must be combined with VOM emissions from miscellaneous metal parts and products coating lines to determine applicability. On and after May 1, 2012, VOM emissions from heavy off-highway vehicle products coating lines shall be combined with VOM emissions from miscellaneous metal parts and products coating lines and plastic parts and products coating lines to determine applicability. Any owner or operator of a coating source shall comply with the applicable coating analysis test methods and procedures specified in Section 218.105(a) of this Part and the recordkeeping and reporting requirements specified in Section 218.211(a) of this Subpart if total VOM emissions from the subject coating lines are always less than or equal to 6.8 kg/day (15 lbs/day) before the application of capture systems and control devices and, therefore, are not subject to the limitations of Section 218.204 of this Subpart. Once a category of coating lines at a source is subject to the limitations in Section 218.204 of this Subpart the coating lines are always subject to the limitations in Section 218.204 of this Subpart.

b) Applicability for wood furniture coating

1) The limitations of this Subpart shall apply to a source's wood furniture coating lines if the source contains process emission units, not regulated by Subparts B, E, F (excluding Section 218.204(l) of this Subpart), H (excluding Section 218.405 of this Part), Q, R, S, T (excluding Section 218.486 of this Part), V, X, Y, or BB of this Part, which as a group both:

   A) Have a maximum theoretical emissions of 91 Mg (100 tons) or more per calendar year of VOM if no air pollution control equipment were used; and

   B) Are not limited to less than 91 Mg (100 tons) of VOM per calendar year if no air pollution control equipment were used, through production or capacity limitations contained in a federally enforceable permit or SIP revision.

2) The limitations of this Subpart shall apply to a source's wood furniture coating lines, on and after March 15, 1996, if the source contains process emission units, which as a group, have a potential to emit 22.7 Mg (25 tons) or more of VOM per calendar year and have not limited emissions to less than 22.7 Mg (25 tons) of VOM per calendar year through production or capacity limitations contained in a federally enforceable operating permit or SIP revision, and that:

   A) Are not regulated by Subparts B, E, F (excluding Section 218.204(l) of this Subpart), H, Q, R, S, T (excluding Section 218.486 of this Part), V, X, Y, Z or BB of this Part; and

   B) Are not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.

3) If a source ceases to fulfill the criteria of subsection (b)(1) or (b)(2) of this Section, the limitations of Section 218.204(l) of this Subpart shall continue to apply to any wood furniture coating line which was ever subject to the limitations of Section 218.204(l) of this Subpart.

4) For the purposes of subsection (b) of this Section, an emission unit shall be considered to be regulated by a Subpart if it is subject to the limitations of that Subpart. An emission unit is not considered regulated by a Subpart if it is not subject to the limits of that Subpart, e.g., the emission unit is covered by an exemption in the Subpart or the applicability criteria of the Subpart are not met.

5) Any owner or operator of a wood furniture coating line to which the limitations of this Subpart are not applicable due to the criteria in subsection (b) of this Section shall, upon request by the Agency or the USEPA, submit records to the Agency and the USEPA within 30 calendar days from the date of the request that document that the coating line is exempt from the limitations of this Subpart.

c) On and after March 15, 1996, the limitations of this Subpart shall not apply to touch-up and repair coatings used by a coating source described by Section 218.204(b), (d), (f), (g), ~~and~~ (i), and (q)(5) of this Subpart; provided that the source-wide volume of such coatings used does not exceed 0.95 1 (1 quart) per eight-hour period or exceed 209 1/yr (55 gal/yr) for any rolling 12 month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with subsection (e) of this Section.

d) Prior to May 1, 2012, the limitations of this Subpart shall not apply to touch-up and repair coatings used by a coating source described by Section 218.204(j), (n), and (o) of this Subpart, provided that the source-wide volume of the coatings used does not exceed 0.95 l (1 quart) per eight-hour period or exceed 209 l/yr (55 gal/yr) for any rolling 12 month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with subsection (e) of this Section.

e) On and after March 15, 1996, the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of Section 218.204(b), (d), (f), (g), (i), (j), (n), ~~and~~ (o), and (q)(5) of this Subpart because of the provisions of subsection 218.208(c) or (d) of this section shall:

1) Collect and record the name, identification number, and volume used of each touch-up and repair coating, as applied on each coating line, per eight-hour period and per month;

2) Perform calculations on a daily basis, and maintain at the source records of such calculations, of the combined volume of touch-up and repair coatings used source-wide for each eight-hour period;

3) Perform calculations on a monthly basis, and maintain at the source records of such calculations, of the combined volume of touch-up and repair coatings used source-wide for the month and the rolling 12 month period;

4) Prepare and maintain at the source an annual summary of the information required to be compiled pursuant to subsections (e)(1) and (e)(2) of this Section on or before January 31 of the following year;

5) Maintain at the source for a minimum period of three years all records required to be kept under this subsection (e) and make such records available to the Agency upon request;

6) Notify the Agency in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 l (1 quart) per eight-hour period or exceeds 209 l/yr (55 gal/yr) for any rolling 12 month period within 30 days after any such exceedance. Such notification shall include a copy of any records of such exceedance; and

7) "Touch-up and repair coatings" means, for purposes of 35 Ill. Adm. Code 218.208, any coating used to cover minor scratches and nicks that occur during manufacturing and assembly processes.

Section 218.211 Recordkeeping and Reporting

.....

c) Any owner or operator of a coating line subject to the limitations of Section 218.204 of this Subpart other than Section 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) of this Subpart and complying by means of Section 218.204 of this Subpart shall comply with the following:

.....

3) On and after a date consistent with Section 218.106 of this Part, the owner or operator of a subject coating line shall notify the Agency in the following instances:

A) Any record showing violation of Section 218.204 of this Subpart shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation.

B) At least 30 calendar days before changing the method of compliance from Section 218.204 of this Subpart to Section 218.205 or Section 218.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (d)(1) or~~,~~ (e)(1)~~, or (i)(1)~~ of this Section, as applicable. Upon changing the method of compliance from Section 218.204 of this Subpart to Section 218.205 of this Subpart or Section 218.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (d) or~~,~~ (e)~~, or (i)~~ of this Section, as applicable.

d) Any owner or operator of a coating line subject to the limitations of Section 218.204 of this Subpart and complying by means of Section 218.205 of this Subpart shall comply with the following:

.....

3) On and after a date consistent with Section 218.106 of this Part, the owner or operator of a subject coating line shall notify the Agency in the following instances:

A) Any record showing violation of Section 218.205 of this Subpart shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation.

B) At least 30 calendar days before changing the method of compliance with this Subpart from Section 218.205 of this Subpart to Section 218.204 or Section 218.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (c)(1) or~~,~~ (e)(1)~~, or (i)(1)~~ of this Section, as applicable. Upon changing the method of compliance with this Subpart from Section 218.205 to Section 218.204 or Section 218.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (c) or~~,~~ (e)~~, or (i)~~ of this Section, as applicable.

.....

~~j) Each owner or operator of a pleasure craft surface coating operation subject to the limitations in Section 218.204(q)(5)(A) through (G) of this Subpart and complying by means of Section 218.207(o) of this Subpart shall comply with the following:~~

~~1) By a date consistent with Section 218.106 of this Part, or upon initial start-up of a new pleasure craft surface coating operation, whichever is later, or upon changing the method of compliance for an existing subject coating operation from Section 218.204, 218.205, or 218.207(n) of this Subpart to Section 218.207(o) of this Subpart, the owner or operator of a subject coating operation shall perform all tests and calculations necessary to demonstrate that the subject coating line will be in compliance with Section 218.207(o) on and after a date consistent with Section 218.106 of this Part, or on and after the initial start-up date.~~

~~2) On and after a date consistent with Section 218.106 of this Part, or on and after the initial start-up date, whichever is later, the owner or operator of a subject pleasure craft coating operation shall:~~

~~A) Collect and record the following information each month:~~

~~i) The amount of each pleasure craft surface coating used in each subject coating operation;~~

~~ii) The VOM content and coating category of each pleasure craft surface coating used in each subject coating operation;~~

~~iii) Total monthly VOM emissions for all subject pleasure craft surface coating operations;~~

~~B) At the end of the first 12-month averaging period, and at the end of each subsequent month, collect and record the following information:~~

~~i) The VOM mass emission limit for all subject pleasure craft surface coating operations for the applicable 12-month averaging period, with supporting calculations;~~

~~ii) The total actual emissions of VOM from all subject pleasure craft surface coating operations for the applicable 12-month averaging period;~~

~~C) Notify the Agency in writing of any violation of the requirements of Section 218.207(o) within 30 days following the occurrence of the violation and provide records documenting the violation upon request by the Agency;~~

~~D) Notify the Agency in writing at least 30 calendar days before changing the method of compliance with this Subpart from Section 218.207(o) to Section 218.204, 218.205, or 218.207(n). Upon changing the method of compliance, the owner or operator shall comply with all requirements set forth in subsection (c), (d), or (e) of this Section, as applicable;~~

~~E) Maintain at the source all records required by this subsection (j) for a minimum of three years from the date the document was created, and provide such records to the Agency upon request.~~

Part 219:

Section 219.204 Emission Limitations

q) Miscellaneous Metal Parts and Products Coatings and Plastic Parts and Products Coatings On and After May 1, 2012.

.....

5) Pleasure Craft Surface Coatings

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	Extreme high gloss coating – topcoat	0.60~~0.49~~ (5.0)~~(4.1)~~	1.88~~1.10~~ (15.6)~~(9.2)~~
B)	High gloss coating – topcoat	0.42 (3.5)	0.80 (6.7)
C)	Pretreatment wash primer	0.78 (6.5)	6.67 (55.6)
D)	Finish primer/surfacer	~~0.42~~ ~~(3.5)~~	~~0.80~~ ~~(6.7)~~
	Prior to January 1, 2014:	0.60 (5.0)	1.88 (15.6)
	On and after January 1, 2014:	0.42 (3.5)	0.80 (6.7)
E)	High build primer/surfacer	0.34 (2.8)	0.55 (4.6)
F)	Aluminum substrate antifoulant coating	0.56 (4.7)	1.53 (12.8)
G)	Other substrate antifoulant coating	0.40~~0.33~~ (3.3)~~(2.8)~~	0.73~~0.53~~ (5.8)~~(4.4)~~
H)	Antifouling Sealer/Tie Coat	0.42 (3.5)	0.80 (6.7)
~~H~~I)	All other pleasure craft surface coatings for metal or plastic	0.42 (3.5)	0.80 (6.7)

Section 219.207 Alternative Emission Limitations

a) Any owner or operator of a coating line subject to Section 219.204 of this Subpart, except coating lines subject to Section 219.204(q)(6), may comply with this Section, rather than with Section 219.204 of this Subpart, if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with subsection (c), (d), (e), (f), (g), (h), (i), (j), (k), (l), or (m) of this Section (depending upon the source category) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in Section 219.105 of this Part

and the recordkeeping and reporting requirements specified in Section 219.211(e) of this Subpart; and the control device is equipped with the applicable monitoring equipment specified in Section 219.105(d) of this Part and the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use. A capture system and control device, which does not demonstrate compliance with subsection (c), (d), (e), (f), (g), (h), (i), (j), (k), (l), or (m) of this Section may be used as an alternative to compliance with Section 219.204 of this Subpart only if the alternative is approved by the Agency and approved by the USEPA as a SIP revision. ~~The owner or operator of a pleasure craft surface coating operation subject to Section 219.204(q)(5)(A) through (G) of this Subpart may also comply with subsection (n) of this Section, rather than with Section 219.204 of this Subpart.~~

.....

~~n) Emissions Averaging Alternative for Pleasure Craft Surface Coating Operations. The owner or operator of a source with coating operations subject to the requirements of Section 219.204(q)(5)(A) through (G) may elect to include such operations in the emissions averaging alternative. Coating operations utilizing this alternative shall comply with a source-specific VOM emission limit on a 12-month rolling average basis, calculated at the end of each calendar month. Subject coating operations that do not utilize the emissions averaging alternative and coating operations subject to Section 219.204(q)(5)(H), shall comply with the requirements in Section 219.204(q)(5) or 219.205, or subsection (m) of this Section, as applicable, as well as with all other applicable requirements in this Subpart.~~

~~1) The total actual VOM emissions determined by Equation 2 shall be equal to or less than the total allowable VOM emissions determined by Equation 1. The owner or operator of a source subject to this subsection (n) shall use Equation 1 to determine the total allowable source-specific VOM mass emission limit for pleasure craft coatings included in this emissions average:~~

~~Equation 1:~~

$$VOM_{Allowable} = \sum_{i=A}^{G} LIM_i V_i$$

~~where:~~

~~$VOM_{Allowable}$~~ = ~~Total allowable mass of VOM that can be emitted from the pleasure craft coating operations included in the average, expressed in kilograms per 12-month period.~~

~~LIM_i~~ = ~~The applicable VOM content limit for a specified pleasure craft coating category from Section 219.204(q)(5)(A) through (G), expressed in kilograms per liter.~~

~~V_i~~ = ~~Volume of specified pleasure craft coating category from Section 219.204(q)(5)(A) through (G) used in the past 12 months, excluding water and any compounds that are exempt, expressed in liters.~~

~~i~~ = ~~Subscript denoting a specific pleasure craft coating category from Section 219.204(q)(5)(A) through (G).~~

~~2) At the end of the first 12 month averaging period, and at the end of each subsequent month, the owner or operator of a source subject to this subsection (n) shall use Equation 2 to calculate the total actual VOM emissions from the pleasure craft coating operations included in the emissions average.~~

~~Equation 2:~~

$$VOM_{Actual} = \sum_{i=A}^{G} VOM_i V_i$$

~~where:~~

~~VOM_{Actual}~~ = ~~VOM emissions calculated using the VOM content for all coatings from Section 219.204(q)(5)(A) through (G) that are included in the average and the volume of those coatings used, expressed in kilograms.~~

~~VOM_i~~ = ~~Weighted average of actual VOM content for a specified pleasure craft coating category from Section 219.204(q)(5)(A) through (G), expressed in kilograms per liter.~~

~~V_i~~ = ~~Total volume of specified pleasure craft coating category from Section 219.204(q)(5)(A) through (G) used in the past 12 months, excluding water and any compounds that are exempt, expressed in liters.~~

~~i~~ = ~~Subscript denoting a specific pleasure craft coating category from Section 219.204(q)(5)(A) through (G).~~

3) For purposes of Equation 2, the owner or operator of a source subject to this subsection (n) shall use Equation 3 to calculate the weighted average VOM content for each coating included in the emissions average for the previous 12 months.

Equation 3:

$$VOM_i = \frac{\sum_{j=1}^{n} VOM_j V_j}{\sum_{j=1}^{n} V_j}$$

where:

VOM_i	=	Weighted average of actual VOM content for a specified pleasure craft coating category from Section 219.204(q)(5)(A) through (G), expressed in kilograms per liter.
VOM_j	=	VOM content of each pleasure craft coating used over the previous 12 months within a specific pleasure craft coating category, i.
V_i	=	Volume of each pleasure craft coating used in the previous 12 months, excluding water and any compounds that are exempt, within a specific pleasure craft coating category, i.
i	=	Subscript denoting a specific pleasure craft coating category from Section 219.204(q)(5)(A) through (G).
j	=	Subscript denoting a specific pleasure craft coating within a specified coating category, i.
n	=	Number of coatings applied within a specific coating category, i.

Section 219.208 Exemptions From Emission Limitations

a) Exemptions for all coating categories except wood furniture coating. The limitations of this Subpart shall not apply to coating lines within a source, that otherwise would be subject to the same subsection of Section 219.204 (because they belong to the same coating category, e.g., can coating), provided that

combined actual emissions of VOM from all lines at the source subject to that subsection never exceed 6.8 kg/day (15 lbs/day) before the application of capture systems and control devices. (For example, can coating lines within a source would not be subject to the limitations of Section 219.204(b) of this Subpart if the combined actual emissions of VOM from the can coating lines never exceed 6.8 kg/day (15 lbs/day) before the application of capture systems and control devices.) Prior to May 2012, volatile organic material emissions from heavy off-highway vehicle products coating lines must be combined with VOM emissions from miscellaneous metal parts and products coating lines to determine applicability. On and after May 1, 2012, VOM emissions from heavy off-highway vehicle products coating lines shall be combined with VOM emissions from miscellaneous metal parts and products coating lines and plastic parts and products coating lines to determine applicability. Any owner or operator of a coating source shall comply with the applicable coating analysis test methods and procedures specified in Section 219.105(a) of this Part and the recordkeeping and reporting requirements specified in Section 219.211(a) of this Subpart if total VOM emissions from the subject coating lines are always less than or equal to 6.8 kg/day (15 lbs/day) before the application of capture systems and control devices and, therefore, are not subject to the limitations of Section 219.204 of this Subpart. Once a category of coating lines at a source is subject to the limitations in Section 219.204 of this Part the coating lines are always subject to the limitations in Section 219.204 of this Subpart.

b) Applicability for wood furniture coating

1) The limitations of this Subpart shall apply to a source's wood furniture coating lines if the source contains process emission units, not regulated by Subparts B, E, F (excluding Section 219.204(l) of this Subpart), H (excluding Section 219.405 of this Part), Q, R, S, T (excluding Section 219.486 of this Part), V, X, Y, Z or BB of this Part, which as a group both:

A) Have a maximum theoretical emissions of 91 Mg (100 tons) or more per calendar year of VOM if no air pollution control equipment were used, and

B) Are not limited to less than 91 Mg (100 tons) of VOM per calendar year if no air pollution control equipment were used, through production or capacity limitations contained in a federally enforceable permit or SIP revision.

2) The limitations of this Subpart shall apply to a source's wood furniture coating lines, on and after March 15, 1996, if the source contains process emission units, which as a group, have a potential to emit 22.7 Mg (25 tons) or more of VOM per calendar year and have not limited emissions to less than 22.7 Mg (25 tons) of VOM per calendar year through production or capacity limitations contained in a federally enforceable operating

permit or SIP revision, and that:

A) Are not regulated by Subparts B, E, F (excluding Section 219.204(l) of this Subpart), H, Q, R, S, T (excluding Section 219.486 of this Part), V, X, Y, Z or BB of this Part; and

B) Are not included in any of the following categories: synthetic organic chemical manufacturing industry (SOCMI) distillation, SOCMI reactors, plastic parts coating (business machines), plastic parts coating (other), offset lithography, industrial wastewater, autobody refinishing, SOCMI batch processing, volatile organic liquid storage tanks and clean-up solvents operations.

3) If a source ceases to fulfill the criteria of subsection (b)(1) or (b)(2) of this Section, the limitations of Section 219.204(l) of this Subpart shall continue to apply to any wood furniture coating line which was ever subject to the limitations of Section 219.204(l) of this Subpart.

4) For the purposes of subsection (b) of this Section, an emission unit shall be considered to be regulated by a Subpart if it is subject to the limitations of that Subpart. An emission unit is not considered regulated by a Subpart if it is not subject to the limits of that Subpart, e.g., the emission unit is covered by an exemption in the Subpart or the applicability criteria of the Subpart are not met.

5) Any owner or operator of a wood furniture coating line to which the limitations of this Subpart are not applicable due to the criteria in subsection (b) of this Section shall, upon request by the Agency or the USEPA, submit records to the Agency and the USEPA within 30 calendar days from the date of the request that document that the coating line is exempt from the limitations of this Subpart.

c) On and after March 15, 1996, the limitations of this Subpart shall not apply to touch-up and repair coatings used by a coating source described by Section 219.204(b), (d), (f), (g), ~~and~~ (i), and (q)(5) of this Subpart; provided that the source-wide volume of such coatings used does not exceed 0.95 l (1 quart) per eight-hour period or exceed 209 l/yr (55 gal/yr) for any rolling 12 month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with subsection (d) of this Section.

d) Prior to May 1, 2012, the limitations of this Subpart shall not apply to touch-up and repair coatings used by a coating source described by Section 219.204(j), (m), and (n) of this Subpart, provided that the source-wide volume of the coatings used does not exceed 0.95 l (1 quart) per eight-hour period or exceed 209 l/yr (55 gal/yr) for any rolling twelve month period. Recordkeeping and reporting for touch-up and repair coatings shall be consistent with subsection (e) of this

Section.

e) On and after March 15, 1996, the owner or operator of a coating line or a group of coating lines using touch-up and repair coatings that are exempted from the limitations of Section 219.204(b), (d), (f), (g), (i), (j), (m), ~~and~~ (n), and (q)(5) of this Subpart because of the provisions of subsection (c) or (d) of this Section shall:

1) Collect and record the name, identification number, and volume used of each touch-up and repair coating, as applied on each coating line, per eight-hour period and per month;

2) Perform calculations on a daily basis, and maintain at the source records of such calculations of the combined volume of touch-up and repair coatings used source-wide for each eight-hour period;

3) Perform calculations on a monthly basis, and maintain at the source records of such calculations of the combined volume of touch-up and repair coatings used source-wide for the month and the rolling 12 month period;

4) Prepare and maintain at the source an annual summary of the information required to be compiled pursuant to subsections (e)(1) and (e)(2) of this Section on or before January 31 of the following year;

5) Maintain at the source for a minimum period of three years all records required to be kept under this subsection (e) and make such records available to the Agency upon request;

6) Notify the Agency in writing if the use of touch-up and repair coatings at the source ever exceeds a volume of 0.95 1 (1 quart) per eight-hour period or exceeds 209 1/yr (55 gal/yr) for any rolling 12 month period within 30 days after any such exceedance. Such notification shall include a copy of any records of such exceedance; and

7) "Touch-up and repair coatings" means, for purposes of 35 Ill. Adm. Code 219.208, any coating used to cover minor scratches and nicks that occur during manufacturing and assembly processes.

Section 219.211 Recordkeeping and Reporting

.....

c) Any owner or operator of a coating line subject to the limitations of Section 219.204 of this Subpart other than Section 219.204(a)(1)(B), (a)(1)(C), (a)(2)(B),

(a)(2)(C), or (a)(2)(D) of this Subpart and complying by means of Section 219.204 of this Subpart shall comply with the following:

.....

3) On and after a date consistent with Section 219.106 of this Part, the owner or operator of a subject coating line shall notify the Agency in the following instances:

A) Any record showing violation of Section 219.204 of this Subpart shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation.

B) At least 30 calendar days before changing the method of compliance from Section 219.204 to Section 219.205 or Section 219.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (d)(1) or, (e)(1), ~~or (i)(1),~~ as applicable. Upon changing the method of compliance from Section 219.204 to Section 219.205 or Section 219.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (d) or, (e)~~, or (i)~~ of this Section, as applicable.

d) Any owner or operator of a coating line subject to the limitations of Section 219.204 of this Subpart and complying by means of Section 219.205 of this Subpart shall comply with the following:

.....

3) On and after a date consistent with Section 219.106 of this Part, the owner or operator of a subject coating line shall notify the Agency in the following instances:

A) Any record showing violation of Section 219.205 of this Subpart shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation.

B) At least 30 calendar days before changing the method of compliance with this Subpart from Section 219.205 to Section 219.204 or Section 219.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (c)(1) or, (e)(1)~~, or (i)(1)~~ of this Section, as applicable. Upon changing the method of compliance with this Subpart from Section 219.205 to Section 219.204 or Section 219.207 of this Subpart, the owner or operator shall comply with all requirements of subsection (c) or, (e)~~, or (i)~~ of this Section, as applicable.

.....

j) Each owner or operator of a pleasure craft surface coating operation subject to the limitations in Section 219.204(q)(5)(A) through (G) of this Subpart and complying by means of Section 219.207(n) of this Subpart shall comply with the following:

1) By a date consistent with Section 219.106 of this Part, or upon initial start-up of a new pleasure craft surface coating operation, whichever is later, or upon changing the method of compliance for an existing subject coating operation from Section 219.204, 219.205, or 219.207(k) of this Subpart to Section 219.207(n) of this Subpart, the owner or operator of a subject coating operation shall perform all tests and calculations necessary to demonstrate that the subject coating line will be in compliance with Section 219.207(n) on and after a date consistent with Section 219.106 of this Part, or on and after the initial start-up date.

2) On and after a date consistent with Section 219.106 of this Part, or on and after the initial start-up date, whichever is later, the owner or operator of a subject pleasure craft coating operation shall:

A) Collect and record the following information each month:

i) The amount of each pleasure craft surface coating used in each subject coating operation;

ii) The VOM content and coating category of each pleasure craft surface coating used in each subject coating operation;

iii) Total monthly VOM emissions for all subject pleasure craft surface coating operations;

B) At the end of the first 12-month averaging period, and at the end of each subsequent month, collect and record the following information:

i) The VOM mass emission limit for all subject pleasure craft surface coating operations for the applicable 12-month averaging period, with supporting calculations;

ii) The total actual emissions of VOM from all subject pleasure craft surface coating operations for the applicable 12-month averaging period;

C) Notify the Agency in writing of any violation of the requirements of Section 219.207(n) within 30 days following the occurrence of

~~the violation and provide records documenting the violation upon request by the Agency;~~

~~D) Notify the Agency in writing at least 30 calendar days before changing the method of compliance with this Subpart from Section 219.207(n) to Section 219.204, 219.205, or 219.207(m). Upon changing the method of compliance, the owner or operator shall comply with all requirements set forth in subsection (c), (d), or (e) of this Section, as applicable.~~

~~E) Maintain at the source all records required by this subsection (j) for a minimum of three years from the date the document was created, and provide such records to the Agency upon request.~~

Corrected Equation for Fiberglass Boat Manufacturing Materials

The Illinois EPA recently noticed that a plus sign ("+") is missing between the third and fourth terms of Equation 3 in Section 218.891(c). The Illinois EPA therefore recommends the following amendment:

Section 218.891 Emission Limitations and Control Requirements

c) Emissions Averaging Alternative. The owner or operator of a source subject to the requirements of this Subpart may elect to include some or all of the subject resin and gel coat operations at the source in the emissions averaging alternative. Resin and gel coat operations utilizing the emissions averaging alternative shall comply with a source-specific monomer VOM mass emission limit on a 12-month rolling average basis, calculated at the end of each calendar month. All subject resin and gel coat operations that do not utilize the emissions averaging alternative shall comply with the requirements in subsection (b) or (d) of this Section, as well as with all other applicable requirements in this Section.

.....

2) At the end of the first 12-month averaging period, and at the end of each subsequent month, the owner or operator of a source subject to this subsection (c) shall use Equation 3 to calculate the monomer VOM emissions from the resin and gel coat operations included in the emissions average. The monomer VOM emissions calculated using Equation 3 shall not exceed the monomer VOM limit calculated using Equation 2.

Equation 3:

~~Monomer VOM Emissions~~ = ~~$\frac{(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})}{(PV_{TR})(M_{TR})+(PV_{TG})(M_{TG})}$~~

$$\underline{\text{Monomer VOM Emissions}} = \frac{(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})+}{(PV_{TR})(M_{TR})+(PV_{TG})(M_{TG})}$$

where:

Monomer VOM Emissions	=	Monomer VOM emissions calculated using the monomer VOM emission equations for each operation included in the average, expressed in kilograms;
PV_R	=	Weighted-average monomer VOM emission rate for production resin used in the past 12 months, expressed in kg/Mg, calculated in accordance with Equation 4 in subsection (c)(3);
M_R	=	Mass of production resin used in the past 12 months, expressed in Mg;
PV_{PG}	=	Weighted-average monomer VOM emission rate for pigmented gel coat used in the past 12 months, expressed in kg/Mg, calculated pursuant to Equation 4;
M_{PG}	=	Mass of pigmented gel coat used in the past 12 months, expressed in Mg;
PV_{CG}	=	Weighted-average monomer VOM emission rate for clear gel coat used in the past 12 months, expressed in kg/Mg, calculated pursuant to Equation 4;
M_{CG}	=	Mass of clear gel coat used in the past 12 months, expressed in Mg;
PV_{TR}	=	Weighted-average monomer VOM emission rate for tooling resin used in the past 12 months, expressed in kg/Mg, calculated pursuant to Equation 4;
M_{TR}	=	Mass of tooling resin used in the past 12 months, expressed in Mg;
PV_{TG}	=	Weighted-average monomer VOM emission rate for tooling gel coat used in the past 12 months, expressed in

kg/Mg, calculated pursuant to Equation 4;

M_{TG} = Mass of tooling gel coat used in the past 12 months, expressed in Mg.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: _____
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: May 16, 2011

1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	R11-23
REASONABLY AVAILABLE CONTROL	)	(Rulemaking-Air)
TECHNOLOGY (RACT) FOR VOLATILE	)	
ORGANIC MATERIAL EMISSIONS FROM	)	
GROUP II AND GROUP IV CONSUMER &	)	
COMMERCIAL PRODUCTS: PROPOSED	)	
AMENDMENTS TO 35 ILL. ADM. CODE 211,	)	
218, and 219	)	

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state that I have served electronically the attached POST-HEARING COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY upon the following person:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

and electronically to the following persons:

SEE ATTACHED SERVICE LIST.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: Dana Vetterhoffer
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: May 16, 2011

1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

Service List R11-23

Timothy J. Fox
Hearing Officer
Illinois Pollution Control Board
100 W. Randolph St., Suite 11-500
Chicago, IL 6060 I
foxt@ipcb.state.il.us

Virginia Yang
Deputy Legal Counsel
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702-1271
virginia.yang@illinois.gov

Matthew Dunn, Chief
Division of Environmental Enforcement
Office of the Attorney General
100 West Randolph St., Suite 1200
Chicago, IL 60601
mdunn@atg.state.il.us

Alec M. Davis
General Counsel
Illinois Environmental Regulatory Group
215 E. Adams St.
Springfield, IL 62701
adavis@ierg.org

James Sell
American Coatings Association
1500 Rhode Island Avenue, NW
Washington, DC 20005
jsell@paint.org

Katherine D. Hodge
Monica T. Rios
Hodge Dwyer & Driver
3150 Roland Ave.
P.O. Box 5776
Springfield, IL 62705-5776
khodge@hddattorneys.com
mrios@hddattorneys.com