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SEP 10 2001

STATE OF ILLINOIS
Pollution Control Board

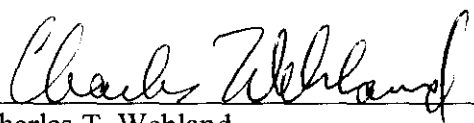
**BEFORE THE ILLINOIS POLLUTION
CONTROL BOARD**

Bridgestone/Firestone Off-Road Tire Company,)	
)	PCB <u>02-31</u>
Petitioner,)	(Permit Appeal - Air)
)	
v.)	
)	
Illinois Environmental Protection Agency,)	
)	
Respondent.)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have today filed with the office of the Clerk of the Pollution Control Board the Petition for Administrative Review and Stay of Effectiveness of Bridgestone/Firestone Off-Road Tire Company and the Notice of Appearance of Charles T. Wehland and Eacata Gregory, copies of which are hereby served upon you.

Date: September 7, 2001



Charles T. Wehland
JONES, DAY, REAVIS & POGUE
77 West Wacker
Chicago, Illinois 60601
(312) 782-3939

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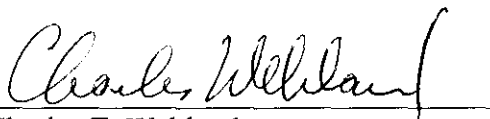
**Illinois Environmental
Protection Agency,**

Respondent.

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) **PCB 02-31**
) **(Permit Appeal - Air)**
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NOTICE OF APPEARANCE

Charles T. Wehland and Eacata Gregory, of JONES, DAY, REAVIS & POGUE, hereby enter an appearance in this proceeding on behalf of Bridgestone/Firestone Off-Road Tire Company.



Charles T. Wehland
One of the Attorneys for
Bridgestone/Firestone
Off-Road Tire Company
JONES, DAY, REAVIS & POGUE
77 West Wacker
Chicago, Illinois 60601
(312) 782-3939

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Pollution Control Board

Bridgestone/Firestone)	
Off-Road Tire Company,)	PCB <u>09-31</u>
)	(Permit Appeal - Air)
Petitioner,)	
)	
v.)	
)	
Illinois Environmental)	
Protection Agency,)	
)	
Respondent.)	

**PETITION FOR ADMINISTRATIVE REVIEW
AND STAY OF EFFECTIVENESS**

Pursuant to 415 ILCS 5/40.2 and 35 Illinois Administrative Code 105.300, Bridgestone/Firestone Off-Road Tire Company ("BFS") hereby files this petition for administrative review and request for stay of effectiveness for the Title V Permit 95120125 issued August 6, 2001. BFS is an off-road rubber tire manufacturer located at Veterans Parkway and Fort Jesse Road, Bloomington, Illinois, and is the applicant of the above-referenced permit. In the interest of obtaining a factual and legal permit, BFS submits this petition and stay request to address the unreasonable grouping requirements imposed on the facility's tire assembly machines ("TAMs").

The Bloomington facility contains 36 TAMs, which are used to prepare green tires for further curing and finishing operations. Permit Condition 7.3.6 Emission Limitations separates the TAMs into separate groups, each with different emission limits. This is in spite of the fact that the Illinois Environmental Protection Agency ("IEPA") had previously stated that it would

impose a single group emission limit for all of the TAMs. IEPA made this statement in issuing the construction permit for the newest TAMs at the facility. Moreover, the IEPA had rolled the emissions for all tire assembly operations and cement/solvent usage into a single operating permit with a single group emission limit prior to the issuance of the most recent construction permits.

BFS does not believe that separate group limits are necessary. Contrary to the Agency's assertion, there were no limitations placed on the 15 designated TAMs at construction pursuant to the PSD program to avoid its applicability. Instead, the net emissions increase from the modification of the TAMs was found to be insignificant. In fact, none of the contemporaneous VOM emission changes due to new and retired TAMs at the facility have, to date, been significant so as to qualify as a major modification.

All of the TAMs perform the same function and are subject to the same regulatory requirements. A single group emission limit is not only legally appropriate and consistent with EPA guidance, but also reflects and supports the reality of plant operations. Because the separate grouping requirement is based on the Agency's erroneous assumption, the IEPA acted arbitrarily in imposing this condition. BFS, therefore, requests that Section 7.3.6 be rewritten to provide an appropriate emission limit for all of the TAMs as a single group.

BFS also requests that this challenged condition be stayed pending resolution. The petition shows that BFS is likely to succeed on the merits. BFS would be harmed if it has to begin to implement requirements that are not legally supportable. Moreover, the challenged condition would necessitate redundant and unnecessary record keeping at each group of TAMs of production and cement usage -- record keeping that would be highly prone to oversight, human error, and unnecessary expense. In contrast, the IEPA and the public would not be

harmful in any way if a stay is granted because the applicable overall emission limits will not be affected.

For the reasons stated above, BFS requests that this Petition for Review be granted and the contested condition be stayed pending resolution.

Respectfully submitted,




Charles T. Wehland
Eacata Gregory
Jones, Day, Reavis & Pogue
77 W. Wacker Drive
Chicago, IL 60601
(312) 782-3939 (phone)
(312) 782-8585 (fax)

CERTIFICATE OF SERVICE

Charles T. Wehland, an attorney, hereby certifies that he served a copy of the attached Petition for Administrative Review and Stay of Effectiveness of Bridgestone/Firestone Off-Road Tire Company and the Notice of Appearance by Charles T. Wehland and Eacata Gregory upon the person(s) listed below via U.S. mail on September 7, 2001.

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 N. Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276



Charles T. Wehland
JONES, DAY, REAVIS & POGUE
77 West Wacker
Chicago, Illinois 60601
(312) 782-3939

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Bridgestone/Firestone Off-Road Tire Company
Attn: Bill Hawks
Veterans Parkway and Fort Jesse Road
Bloomington, Illinois 61702-0640

Application No.: 95120125 I.D. No.: 113823AAB
Applicant's Designation: Date Received: December 7, 1995
Operation of: Rubber Tires Manufacturing Plant
Date Issued: August 6, 2001 Expiration Date²: August 5, 2006
Source Location: Veterans Parkway and Fort Jesse Road, Bloomington, McLean
County
Responsible Official: Ron Brooks, Director of Manufacturing

This permit is hereby granted to the above-designated Permittee to OPERATE a Rubber Tires Manufacturing Plant, 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 Anatoly Belogorsky at 217/782-2113.

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

DES:AB:psj

cc: Illinois EPA, FOS, Region 3
USEPA

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

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NOT APPLICABLE TO THIS PERMIT	15
7.0 UNIT SPECIFIC CONDITIONS	16
7.1 Rubber Mills	
7.2 Calender Stations	
7.3 Green Tire Assembly Stations	
7.4 Green Tire Doping and Finishing Spray Booths	
7.5 Curing Presses	
7.6 Solvent Storage Tank	
7.7 Fuel Combustion Emission Units	
8.0 GENERAL PERMIT CONDITIONS	41
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	

PAGE

8.6	Reporting Requirements	
8.7	Obligation to Comply with Title I Requirements	
9.0	STANDARD PERMIT CONDITIONS	46
9.1	Effect of Permit	
9.2	General Obligations of Permittee	
9.3	Obligation to Allow Illinois EPA Surveillance	
9.4	Obligation to Comply with Other Requirements	
9.5	Liability	
9.6	Recordkeeping	
9.7	Annual Emissions Report	
9.8	Requirements for Compliance Certification	
9.9	Certification	
9.10	Defense to Enforcement Actions	
9.11	Permanent Shutdown	
9.12	Reopening and Reissuing Permit for Cause	
9.13	Severability Clause	
9.14	Permit Expiration and Renewal	
10.0	ATTACHMENTS	
10.1	Attachment 1 - Allowable Emissions of Particulate Matter	1-1
10.2	Attachment 2 - Example Certification by a Responsible Official	2-1
10.3	Attachment 3 - Guidance on Revising This Permit	3-1
10.4	Attachment 4 - Form 199-CAAPP, Application For Construction Permit (For CAAPP Sources Only)	4-1
10.5	Attachment 5 - Guidance on Renewing this Permit	5-1

1.0 SOURCE IDENTIFICATION

1.1 Source

Bridgestone/Firestone Off-Road Tire Company
Veterans Parkway and Fort Jesse Road
Bloomington, Illinois 61702-0640

309/452-4411

I.D. No.: 113823AAB

Standard Industrial Classification: 3011, Rubber Products

1.2 Owner/Parent Company

Bridgestone/Firestone Inc.
50 Century Blvd.
Nashville, Tennessee 37214

1.3 Operator

Bridgestone/Firestone Off-Road Tire Company
Veterans Parkway and Fort Jesse Road
Bloomington, Illinois 61702-0640

Contact Person's Name:

Bill Hawks

309/451-2318

1.4 General Source Description

Bridgestone/Firestone Off-Road Tire Company is located at Veterans Parkway and Fort Jesse Road in Bloomington and manufactures off-road rubber tires. The source operates the following significant emission units at this site: rubber mills, calender stations, green tire assembly and spray booth stations, curing presses, solvent storage tank, and fuel combustion emission units.

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
BAT	Best Available Technology
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
Cd	Cadmium
CEMS	Continuous Emission Monitoring System
cfm	Cubic foot per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
ft	Feet
G	Grams
gal	Gallons
gr	Grains
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
Hg	Mercury
HMIWI	Hospital/Medical/Infectious Waste Incinerator
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
L	liter
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mg	milligram
mmBtu	Million British thermal units
mmscf	Million standard cubic feet
mo	month
MW	Megawatts

NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
Pb	Lead
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
scf	Standard cubic feet
scm	Standard cubic meters
SO ₂	Sulfur Dioxide
T	Ton
TEQ	Toxic equivalency
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
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
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:

Finish Department tire inspection stations;
Wastewater treatment plant; and
Small rubber warm-up mills

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

None

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

- a. 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)].
- b. Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].
- c. Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].
- d. Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW

(150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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
Unit 1	Rubber Mills	N/A	None
Unit 2	Calender Stations	N/A	None
Unit 3	Green Tire Assembly Stations	N/A	None
Unit 4	Green Tire Doping & Finishing Spray Booths	N/A	Filters
Unit 5	Curing Presses	N/A	None
Unit 6	Solvent Storage Tank	1996	None
Unit 7	Fuel Combustion Emission Units	N/A	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

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.

5.3 Non-Applicability of Regulations of Concern

- a. This source is not subject to 35 IAC Part 215 Subpart S "Rubber and Miscellaneous Plastic Products" and 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry". These regulations apply for tires with a bead diameter of less than 19.7 inches. This non-applicability is based on the size of tires (from about 36 inches and more in diameter) manufactured at this location.
- b. This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source does not have a pollutant-specific emissions unit that uses an add-on control device to achieve compliance with an emission limitation or standard.

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)	930.4
Sulfur Dioxide (SO ₂)	0.4
Particulate Matter (PM)	12.5
Nitrogen Oxides (NO _x)	76.5
HAP, not included in VOM or PM	----
TOTAL	1,019.8

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

None

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 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified

by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance 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.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 1 Rubber Mills

7.1.1 Description

The purchased rubber is first milled, which is the process of working and blending the various rubber compounds between sets of metal rollers. Milling not only blends the rubber compounds but raises its temperature. Raising the temperature of the rubber makes it more pliable and able to withstand the mechanical stresses imposed by the manufacturing operations carried out at the facility. There are nine primary mills at this location. The rubber is passed from mill to mill to process and prepare the various compounds. Once the rubber is properly blended and prepared, overhead conveyors transfer it from the mills to the various manufacturing operations.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 1:	Nine Rubber Mills	None

7.1.3 Applicability Provisions and Applicable Regulations

a. An "affected rubber mill" is an emission unit which blends the various rubber compounds between sets of metal rollers prior to further transfer to various manufacturing operations.

b. An affected rubber mill is subject to 35 IAC 212.321(b)(1), 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 1) [35 IAC 212.321(a)].

c. 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 unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected rubber mills not being subject to 40 CFR Part 64, Compliance Assurance Monitoring(CAM), because the affected rubber mills do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.1.5 Operating Requirements and Work Practices

None

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, each affected rubber mill is subject to the following:

None

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected rubber mills to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total rubber throughput on the monthly and annual basis (T/mo and T/yr).
- b. Total emissions of VOM calculated based on the procedures established in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of affected rubber mills 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:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the

Illinois EPA's Compliance Section in Springfield, Illinois 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.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with the PM emission limits established by 35 IAC 212.121 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected rubber mills.
- b. To determine compliance with Conditions 5.5.1, VOM emissions from the affected rubber mills shall be calculated based on the emission factor equal to 0.000314 lb/VOM for each lb of rubber processed. This emission factor has been established in Table 4.12-5 of AP-42 and developed by the Rubber Manufacturing Association for rubber milling operations.

7.2 Unit 2 Calender Stations

7.2.1 Description

Calendering is the blending and shaping of rubber by pressing it between rotating metal cylinders. The calendars form the rubber into thin sheets of material. Fabrics or steel can be inserted between layers of calendered rubber to add strength to the product.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 2:	Three calender stations	None

7.2.3 Applicability Provisions and Applicable Regulations

a. An "affected calender station" is an emission unit which shapes rubber by pressing it between rotating metal cylinders.

b. Each affected calender station is subject to 35 IAC 212.321(b)(1), 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 1) [35 IAC 212.321(a)].

c. 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 unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected calender stations not being subject to 40 CFR Part 64, Compliance Assurance Monitoring(CAM), because the affected calender stations do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.2.5 Operating Requirements and Work Practices

None

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected calender station is subject to the following:

None

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for all affected calender stations to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total rubber throughput on the monthly and annual basis (T/mo and T/yr).
- b. Total emissions of VOM calculated based on the procedures established in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected calender stations 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:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois 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.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the PM emission limits established by 35 IAC 212.121 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected rubber mills.
- b. To determine compliance with Conditions 5.5.1, VOM emissions from the affected calender station shall be calculated based on the emission factor equal to 0.000186 lb/VOM for each lb of rubber processed. This emission factor has been established in Table 4.12-7 of AP-42 and developed by the Rubber Manufacturing Association for rubber calendaring operations.

7.3 Unit 3 Green Tire Assembly Stations

7.3.1 Description

All green tire assembly stations are grouped into the following categories: band-building, carcass building, and treading.

The inner liner is first wrapped around a metal cylinder the size of which is dependent upon the required bead diameter. After this, calendered belt material is wrapped around the inner bladder. The number of belts varies depending upon the required strength of the finished product. The beads are then inserted and the sidewalls are added. The final step is the addition of the tread material. Solvents are applied to the tire assemblies as needed to help the various rubber components adhere to one another.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 3:	36 assembly stations	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected assembly station" is an emission unit which prepares a green tire for further curing and finishing operations.
- b. Each affected assembly station is subject to 35 IAC 212.321(b)(1), 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 1) [35 IAC 212.321(a)].

- c. 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 unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected assembly stations not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected assembly stations do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.3.5 Operating Requirements and Work Practices

None

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected assembly stations are subject to the following:

- a. Operation and VOM emissions for the following affected assembly stations shall not exceed levels established in construction permits listed below:

Designation	Permit	Solvent Usage		VOM Emissions	
		(T/Mo)	(T/Yr)	(T/Mo)	(T/Yr)
7 Stations	94100027	3.12	25.00	3.12	25.00
2 Stations	95020123	3.12	25.00	3.12	25.00
1 Station (Giant Loader #994)	96060051	---	--	3.50	15.33
1 Station (46 TAM)	97010083	0.55	4.38	0.55	4.38
1 Station (ORB-25)	99010021	1.31	13.1	1.31	13.1
3 Stations	99100091	---	--	4.43	35.46

- b. The above limitations were established in the Permits mentioned above, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permits do not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- c. 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).

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected assembly stations to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Solvent usage (gal/mo and gal/yr).
- b. VOM content of each solvent applied (lb/gal).
- c. Density of solvent (lb/gal).
- d. Total emissions of HAPs calculated based on the procedures established in Condition 7.3.12.
- e. Total emissions of VOM for all affected assembly stations and VOM emissions for each individual station or group of stations, as established in condition 7.3.6(a), and calculated based on the procedures established in Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected assembly stations 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:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance with the PM emission limits established by 35 IAC 212.121 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected assembly stations.
- b. To determine compliance with Conditions 5.5.1 and 7.3.6(a), VOM emissions from the affected assembly stations shall be calculated based on the formula listed below:

$$\text{VOM (ton)} = \text{Gallons of Solvent Used (gal)} \times \text{VOM Content (lb/gal)} \times (1 \text{ ton}/2000 \text{ lb})$$

7.4 Unit 4 Green Tire Doping and Finishing Spray Booths

7.4.1 Description

Green tires from the assembly stations are transferred to the green tire storage area or to the green tire doping operations. In the doping operations the insides of the green tires are sprayed with a lubricating solution. This lubricating solution is a water based compound that keeps the tires from sticking to the bladders used to inflate them for curing. The outsides of the green tires are sprayed with a water based blemish paint that covers blemishes and areas of discoloration on the surfaces of the tires.

In the finishing department the repaired tires that pass the visual inspection process have the repaired areas ground and buffed to smooth the repair and make it blend in with the rest of the tire. These tires are then sprayed with a blemish paint and sent to the warehouse. This coating process covers any remaining areas of discoloration and provides uniform coloring to the facility's products. The solvents used in this booth consist of waste solvent collected from the individual manufacturing stations.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 4	Three doping spray booths (Green Tires Department)	Filters
	One finish spray booth (Finish Department)	Filter

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected spray booth" is an emission unit which sprays solvent and/or paint on the green or repaired tires.
- b. Each affected spray booth is subject to 35 IAC 212.321(b)(1), 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 1) [35 IAC 212.321(a)].

c. 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 unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.4.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected spray booths not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected spray booths do not have potential pre-control device emissions of PM/PM₁₀ that equals or exceeds major source threshold levels.

7.4.5 Operating Requirements and Work Practices

None

7.4.6 Emission Limitations

None

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected spray booths to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Paint usage (gal/mo and gal/yr).
- b. Solvent usage (gal/mo and gal/yr).
- c. VOM content of each solvent and paint applied (wt.%).
- d. Density of solvent and paint (lb/gal).
- e. Total emissions of VOM calculated based on the procedures established in Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected spray

booths 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:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois 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.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with the PM emission limit established by 35 IAC 212.121 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected spray booths.
- b. To determine compliance with Condition 5.5.1, VOM emissions from the affected spray booths shall be calculated based on the formula listed below:

VOM Emissions(ton) = Gallons of Solvent/Paint Used (gal) x Density (lb/gal) x VOM Content of Solvent/Paint (wt.%) x (1 ton/2000 lb)

7.5 Unit 5 Curing Presses

7.5.1 Description

The source currently uses two basic types of curing machines to cure the tires manufactured by this plant. The first type of machines used at the source is referred to as a "press" and is used to cure the facility's smaller tires. These presses are each capable of curing one tire at a time. The second and largest type of curing machines at the source is capable of curing the facility's present full range of tire sizes. These tires can range from less than three feet to greater than 12 feet in diameter. These machines are referred to as "pot heaters" and are each capable of curing several tires at once. For purposes of the CAAPP permit, "curing press" is referenced to all types of curing machines. On all curing presses the tires are cured with a combination of hot water and steam.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 5:	46 presses and pot heaters for curing tires	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected curing press" is an emission unit for curing either one or several tires at a time.
- b. Each affected curing press is subject to 35 IAC 212.321(b)(1), 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 1) [35 IAC 212.321(a)].

- c. 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 unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.5.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected curing presses not being subject to 40 CFR Part 64, Compliance Assurance Monitoring(CAM), because the affected curing presses do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.5.5 Operating Requirements and Work Practices

None

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected curing presses are subject to the following:

- a. Operation and VOM emissions for the following affected curing presses shall not exceed levels established in construction permits listed below:

Designation	Permit	VOM Emissions	
		(Lb/mo)	(T/yr)
29 Tire Curing Presses or Pot Heaters	96060051, 98100016, 98010008, 99060090	2,500	13.3

- b. The above limitations contain revisions to previously issued Permits mentioned above. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these aforementioned permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the constructions and/or modification addressed in these permits do not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hourly emission rates have been replaced by monthly emission limits. In addition, the emission rate has been modified to be consistent with the most recent emission factors for tire curing [T1R].

- c. 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).

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tire curing stations to demonstrate compliance with Condition 5.5.1 and Section 7 of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total amount of rubber processed for all affected presses and amounts of rubber processed for each individual press or group of presses, as established in condition 7.5.6(a).
- b. Total emissions of VOM for all affected presses and VOM emissions for each individual press or group of presses, as established in condition 7.5.6(a), and calculated based on the procedures established in Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of affected coating booth 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:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois 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.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance with the PM emission limits established by 35 IAC 212.121 is assured and achieved by the proper operation and maintenance, as required by this section and the work-practices inherent in operation of the affected curing presses.
- b. To determine compliance with Conditions 5.5.1 and 7.5.6(a), VOM emissions from the affected curing press and group of presses shall be calculated based on the emission factor equal to 0.000337 lb/VOM for each lb of rubber cured. This emission factor has been established in Table 4.12-11 of AP-42 and developed by the Rubber Manufacturing Association.

7.6 Unit 6: Solvent Storage Tank

7.6.1 Description

Solvents are stored at the 10,000 gallons storage tank.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 6	Storage Tank	Design capacity - 10,000 gallons	Submerged loading pipe

7.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected storage tank" for the purpose of these unit specific conditions is used for keeping solvents applied on different operations performed at this location.
- b. The affected storage tank is subject to 35 IAC 215.122(b) and shall be equipped with a submerged loading pipe if the vapor pressure of volatile organic liquid exceeds 2.5 psia.

7.6.4 Non-Applicability of Regulations of Concern

- a. The affected storage tank is exempted from applicability of 35 IAC 215.121 because the capacity of this tank is less than 40,000 gallons.
- b. The affected storage tank is exempted from applicability of 40 CFR 60, Subpart Kb based on the design capacity of affected storage tank less than 40 cubic meters (10,576 gal).
- c. This permit is issued based on the affected storage tank not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected storage tank do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.6.5 Operational and Production Limits and Work Practices

None

7.6.6 Emission Limitations

In addition to Condition 5.5.1, the affected storage tank is subject to the following:

- a. Operation and VOM emissions for the affected storage tank shall not exceed the following limits:

Solvent Throughput		VOM Emissions	
<u>(gal/mo)</u>	<u>(gal/yr)</u>	<u>(T/mo)</u>	<u>(T/yr)</u>
50,000	250,000	0.22	1.069

- b. These limits are based on the maximum design capacity of affected storage tank and the maximum vapor pressure of solvents stored equal to 2.25 psia.
- c. The above limitations contain revisions to previously issued Permit 96060051. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, monthly and annual solvent usage limits have been established without any increase of annual VOM emission level [T1R].

7.6.7 Testing Requirements

None

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

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

- a. Monthly and annual solvent throughput (gallons/month and gallons/year).
- b. Monthly and annual VOM emissions calculated based on the compliance procedure in Condition 7.6.12.

7.6.10 Reporting Requirements

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

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois 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.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

To determine compliance with Conditions 5.5.1 and 7.6.3, VOM emissions from the affected storage tank shall be calculated based in the current version of the TANK program.

7.7 Unit 7: Fuel Combustion Emission Units

7.7.1 Description

Natural gas and waste oil fired boilers are used to produce heat and steam at the source. Natural gas-fired heaters are used for comfort heating purposes.

7.7.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 7	<p>Steam Boilers</p> <p>Three natural gas-fired boilers with a capability of combusting waste oils.</p> <p>Two boilers are rated at 32.2 mmBtu/hr each and one is rated 35.0 mmBtu/hr</p> <p>Natural Gas-Fired Heaters</p> <p>Heaters are rated at 2.5 mmBtu/hr each (9 units) and 11.0 mmBtu/hr (1 unit)</p>	<p>None</p> <p>None</p>

7.7.3 Applicability Provisions and Applicable Regulations

- a. An "affected fuel combustion emission unit" for the purpose of these unit specific conditions is a natural gas-fired boiler with a capability of combusting waste oils and used for processing heat and steam for plant needs or natural gas-fired heaters used for comfort purposes.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected 50 percent excess air [35 IAC 216.121].
- c. The emissions of particulate matter into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion unit using liquid fuel exclusively [35 IAC 212.206].

7.7.4 Non-Applicability of Regulations of Concern

- a. Each affected boiler is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing

Fuel Combustion Emission Sources in Major Metropolitan Areas, because the actual heat input of each boiler is less than 73.2 MW (250 mmBtu/hr).

- b. Pursuant to 35 IAC 215.303, any fuel combustion emission unit is not subject to 35 IAC Part 215, Subpart G: Use of Organic Material.
- c. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9, 1989 and having a maximum heat input capacity of at least 10 mmBtu/hr. All affected boilers were constructed prior to June 9, 1989. Therefore, all boilers are qualified for exemption from these rules.
- d. This permit is issued based on the affected fuel combustion emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected fuel combustion emission units do not use an add-on control devices to achieve compliance with an emission limitation or standard.

7.7.5 Operational and Production Limits and Work Practices

- a. Each affected fuel combustion emission unit (except boilers) shall only be operated with natural gas as the fuel.
- b. Boilers are allowed the burning of used oil generated on site. The used oil is limited to the following constituents:
 - i. Hydraulic Oil
 - ii. Lubricating Oil
 - iii. Engine Oil
- c. The combustion of used oil may not be initiated during periods of start-up, malfunction, or breakdown. The loading of oil shall be discontinued until the malfunction or breakdown is corrected.
- d. The Permittee is prohibited from mixing hazardous wastes with the used oils. Used oils containing more than 1000 ppm of total halogens is presumed to be a hazardous waste, as per 35 IAC 726.140(c). The Permittee is prohibited from burning such used oils without the approval of the Illinois EPA.

7.7.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, all affected fuel combustion emission units (3 boilers and 10 heaters) are subject to the following:

a. Natural Gas Mode

- i. Total natural gas consumption shall not exceed 96 mmscf/month and 1,143 mmscf/year.
- ii. Total emissions shall not exceed the following limits:

<u>Pollutant</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
NO _x	4.8	57.15
CO	4.03	48.0
PM	0.36	4.34
VOM	0.26	3.14

b. Waste Oil Mode (Boilers only)

Total waste fuel oil usage shall not exceed 320 gal/month and 3,200 gal/year.

- c. These limits are based on the maximum operating rate and standard emission factors established in AP-42. 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).
- d. The above limitations contain revisions to previously issued Permit 73010510. Specifically, emissions of natural gas consumption have been lowered, as reflection of current standard emission factors, and production limitations have been established for waste oil consumption.

7.7.7 Testing Requirements

The Permittee shall analyze on an annual basis a representative sample of the waste oil to be burned, for flash point, BTU content, density, total halogens, arsenic, cadmium, lead, and sulfur. The quantities and analyses of the waste oil shall be reported to the Illinois EPA within 30 days following the year that the oil was burned.

7.7.8 Monitoring Requirements

None

7.7.9 Recordkeeping Requirements

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

- a. Total natural gas consumption (mmscf/month or therms/month and mmscf/yr or therms/yr) for all affected fuel combustion emission units.
- b. Total waste oil consumption (gal/month and gal/year).
- c. Annual emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.7.12.
- d. Test and analysis of the waste oil consumed.

7.7.10 Reporting Requirements

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

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois 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.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 and 7.7.6 of this permit shall be based on the recordkeeping requirements of Condition 7.7.9 and the emission factors and formulas listed below:

- a. Natural Gas Mode

Pollutant	Emission Factor (lb/10 ⁶ ft ³)
PM	7.6
NO _x	100.0
CO	84
VOM	5.5

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

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

b. Waste Oil Mode

Pollutant	Emission Factor (lb/10 ³ gal)
NO _x	19
SO ₂	4.9
CO	5

These are the emission factors provided by the Permittee.

Emissions (lb) = Waste oil consumed multiplied by the appropriate emission factor.

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 June 21, 2001 (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

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before

commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

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

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

<u>Monitoring Period</u>	<u>Report Due Date</u>
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
2009 Mall Street
Collinsville, Illinois 62234

- 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)(p)(ii) of the Act]:

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

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

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

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit 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 Allowable Emissions of Particulate Matter

Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

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

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

where:

P = process weight rate;
E = allowable emission rate; and,

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

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

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

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

- c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

MetricEnglish

<u>P</u> <u>Mg/hr</u>	<u>E</u> <u>kg/hr</u>	<u>P</u> <u>T/hr</u>	<u>E</u> <u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	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

10.2 Attachment 2 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information		
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source	
21. Attention name and/or title for written correspondence:		
22. Technical contact person for application:	23. Contact person's telephone number:	

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
_____ AUTHORIZED SIGNATURE	_____ TITLE OF SIGNATORY
_____ TYPED OR PRINTED NAME OF SIGNATORY	_____ / _____ / _____ DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.
3. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
4. Information addressing any outstanding transfer agreement pursuant to the ERMS.
5.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
 - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

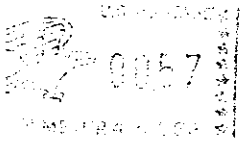
The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

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Clerk of the
Illinois Pollution Control Board
100 West Randolph Street
James R. Thompson Center - Suite 11-500
Chicago, IL 60601-3218

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JONES, DAY, REAVIS & POGUE
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 CHICAGO, IL 60601

CHECK DATE
 09/07/2001

CHECK NO. **1028189**

2-77
710

AMERICAN NATIONAL BANK
 AND TRUST COMPANY OF CHICAGO

OPERATING ACCOUNT
 CHECK AMOUNT

\$75.00*****

SEVENTY-FIVE AND 00/100 DOLLARS

PAY
 TO THE
 ORDER OF

ILLINOIS POLLUTION CONTROL
 BOARD

Ala Reno

VOID AFTER 180 DAYS

⑈ ⑆028189⑈ ⑆071000770⑆ 04085116⑈

Transaction Date 9/10/01

STATE OF ILLINOIS
 POLLUTION CONTROL BOARD
 JAMES R. THOMPSON CENTER
 100 W. RANDOLPH ST.
 SUITE 11-500

INVOICE
 027503

PURCHASER/FILER: CHICAGO, ILLINOIS 60601

Name Jones, Day, Reavis & Pogue
 Firm _____
 Address 77 W. Jackson
 City/State/Zip Chicago IL 60601-1692
 Phone _____

TRANSACTION TYPE		PAYMENT TYPE		
Opinion/Transcript Document Sale	Filing Fee	Cash	Check #	Billable
	✓		1028189	

Description	Unit Price	Unit	Amount
Filing Fee PCB 2-31			75 00
TOTAL			