



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217/785-1705

CONSTRUCTION PERMIT - NESHAP SOURCE

PERMITTEE

Powertrain Rockford Inc.
Attn: Eric Holstein
1200 Windsor Road
Loves Park, Illinois, 61111

<u>Application No.:</u> 24030001	<u>I.D. No.:</u> 201803AAF
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 4, 2024
<u>Subject:</u> Motor Vehicle Parts and Accessories	
<u>Date Issued:</u> November 6, 2024	<u>Expiration Date:</u> See Condition 1.
<u>Location:</u> 1200 Windsor Road, Loves Park, Winnebago County	

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of:

Paint Line 1:

Automatic primer paint booth (E4) with fabric filter;
Automatic topcoat paint booth (E6) with fabric filter;
Manual primer touch up paint booth (E8) with fabric filter;
Manual topcoat touch up paint booth (E10) with fabric filter;
Manual spray can final touch up paint booth (E11) with fabric filter; and
Toluene wipe cleaning (E14);

Paint Line 2:

Automatic primer paint booth (E8A) with fabric filter;
Automatic topcoat paint booth (E18A) with fabric filter;
Manual topcoat touch up paint booth (E22A) with fabric filter;
Manual spray can final touch up paint booth (E23A) with fabric filter; and
Toluene wipe cleaning (E21A);

New Business Equipment:

Manual paint spray booth (E41) with fabric filter;
Manual paint spray booth (E43) with fabric filter;
Pyrolysis cleaning/natural gas-fired burning-off furnace (E45); and
Welding operations (E47)

as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on the emissions of Hazardous Air Pollutants (HAPs), as listed in Section 112(b) of the Clean Air Act, from Paint Line 1, Paint Line 2, and New Business Equipment being less than 10 tons per year of any single HAP and 25 tons per year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs As a result of the conditions in this permit,

2125 S. First Street, Champaign, IL 61820 (217) 278-5800

115 S. LaSalle Street, Suite 2203, Chicago, IL 60603

1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120

9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000

595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200

412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022

4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

the emissions of all HAPs from the above-listed equipment do not trigger the requirements of Section 112(g) of the Clean Air Act.

- b. This permit is issued based on the construction of Paint Line 1, Paint Line 2, and the New Business Equipment not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 204 (Prevention of Significant Deterioration (PSD)). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Volatile Organic Material (VOM) from the above-listed equipment below the levels that would trigger the applicability of these rules.
 - c. The Paint Line 1, Paint Line 2, and New Business Equipment is allowed to operate under this construction permit until the Illinois EPA takes final action on a new Federally Enforceable State Operating Permit (FESOP) application, provided that the Permittee submits a complete application for its new major source within (12) months after the initial startup of operation in accordance with Section 39.5(5) (x), 415 ILCS 5/39.5(5) (x).
 - d. The Paint Line 1, Paint Line 2, and the New Business Equipment shall not begin operation until construction, including construction of any air pollution control equipment, is complete and reasonable measures short of actual operation have been taken to verify proper operation.
- 2a. The Welding operations (E47) are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 Subparts A and XXXXXX: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 63.11514(a), you are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in 40 CFR 63.11514(1) through (9). Descriptions of these source categories are shown in Table 1 of 40 CFR Part 63 Subpart XXXXXX. "Primarily engaged" is defined in 40 CFR 63.11522, "What definitions apply to this subpart?"
- i. Fabricated Metal Products
- b. Pursuant to 40 CFR 63.11514(b), the provisions of 40 CFR Part 63 Subpart XXXXXX apply to each new and existing affected source listed and defined in 40 CFR 63.11514(b) (1) through (5) if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d) (4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts

greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.

- i. A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in 40 CFR 63.11522, "What definitions apply to 40 CFR Part 63 Subpart XXXXXX?", or have the potential to emit MFHAP.
- c. Pursuant to 40 CFR 63.11515(b), if you own or operate a new affected source, you must achieve compliance with the applicable provisions in 40 CFR Part 63 Subpart XXXXXX by July 23, 2008, or upon startup of your affected source, whichever is later.
- d. Pursuant to 40 CFR 63.11516(f), if you own or operate a new or existing welding affected source, you must comply with the requirements in 40 CFR 63.11516(f)(1) and (2) for each welding operation that uses materials that contain MFHAP, as defined in 40 CFR 63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in 40 CFR 63.11516(f)(3) through (8). The requirements in 63.11516(f)(1) through (8) do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.
 - i. You must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in 40 CFR 63.11519(c)(4), "Notification, recordkeeping, and reporting requirements."
 - ii. You must implement one or more of the management practices specified in 63.11516(f)(2)(i) through (v) to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
 - A. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
 - B. Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
 - C. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

- D. Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
 - E. Use a welding fume capture and control system, operated according to the manufacturer's specifications.
- iii. You must perform visual determinations of welding fugitive emissions as specified in 40 CFR 63.11517(b), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations. You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in 40 CFR 63.11519(c)(2), "Notification, recordkeeping, and reporting requirements."
- 3a. The paint line 1, paint line 2, and the new business equipment are subject to 35 Ill. Adm. Code Part 212 Subpart B (Visible Emissions). Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
- c. The source is subject to 35 Ill. Adm. Code Part 212 Subpart K (Fugitive Particulate Matter). Pursuant to 35 Ill. Adm. Code 212.301, 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 toward the zenith at a point beyond the property line of the source.
- d. The paint line 1, paint line 2, and the new business equipment are subject to 35 Ill. Adm. Code Part 212 Subpart L (Particulate Matter Emissions from Process Emission Units). Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).

- e. Pursuant to 35 Ill. Adm. Code 212.321(b), interpolated and extrapolated values of the data in 35 Ill. Adm. Code 212.321(c) shall be determined by using the equation:

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

where:

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

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

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

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

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

- f. Pursuant to 35 Ill. Adm. Code 212.321(c), Limits for Process Emission Units For Which Construction of Modification Commenced On or After April 14, 1972:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.20	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.	3.9	10.00	8.70
13.	4.8	15.00	10.80
18.	5.7	20.00	12.50
23.	6.5	25.00	14.00
27.	7.1	30.00	15.60
32.	7.7	35.00	17.00
36.	8.2	40.00	18.20
41.	8.8	45.00	19.20
45.	9.3	50.00	20.50

90.	13.4	100.00	29.50
140.	17.0	150.00	37.00

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lbs/hr
180.	19.4	200.00	43.00
230.	22.	250.00	48.50
270.	24.	300.00	53.00
320.	26.	350.00	58.00
360.	28.	400.00	62.00
408.	30.1	450.00	66.00
454.	30.4	500.00	67.00

where:

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

4. The Pyrolysis cleaning/natural gas-fired burning-off furnace (E45) is subject to 35 Ill. Adm. Code Part 214 Subpart K (Process Emission Sources). Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 5a. The paint booths (E4, E6, E8, E10, E11, E8A, E18A, E22A, E23A, E41, and E43) are subject to 35 Ill. Adm. Code Part 215 Subpart F (Coating Operations). Pursuant to 35 Ill. Adm. Code 215.204(k), No owner or operator of a coating line shall cause or allow the emission of volatile organic material to exceed the following limitations on coating materials, excluding water and any compounds which are specifically exempted from the definition of volatile organic material pursuant to this Part, delivered to the coating applicator:

Heavy Off-highway Vehicle Products	kg/l	lb/gal
ii. (In the remaining counties)		
Extreme performance prime coat	0.42	3.5
Extreme performance top coat-air dried	0.52	4.3
Final repair coat- air dried	0.58	4.8

- b. The Pyrolysis cleaning burn-off furnace (E45) and Welding operations (E47) are subject to 35 Ill. Adm. Code Part 215 Subpart K (Use of Organic Material). Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code Part 215 Subpart K shall apply only to photochemically reactive material.
6. This permit is issued based on the paint booths (E4, E6, E8, E10, E11, E8A, E18A, E22A, E23A, E41, and E43) at this source not being subject to the New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Body Surface Coating Operations, 40 CFR 60 Subpart MM. This

is because the source does not fit into the definition of Automobile and Light-duty Truck, as defined in 40 CFR 60.391.

- 7a. This permit is issued based on the source not being subject to the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart Mmmm because the source is not a major source of HAP emissions, i.e., the potential emissions of the source are less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
- b. This permit is issued based on the paint booths (E4, E6, E8, E10, E11, E8A, E18A, E22A, E23A, E41, and E43) at the source not being subject to the NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH, because the source does not perform spray application of coatings that contains compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment, pursuant to 40 CFR 63.11169(c).
- c. This permit is issued based on the paint booths (E4, E6, E8, E10, E11, E8A, E18A, E22A, E23A, E41, and E43) at the source not being subject to the NESHAP, 40 CFR 63 Subpart XXXXXX for Nine Metal Fabrication and Finishing Sources at Area Sources of HAP emissions. This is because the source is using paint coating material that does not contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, pursuant to 40 CFR 63.11514(b).
8. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of 35 Ill. Adm. Code 212.314 shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to 35 Ill. Adm. Code 212.314 is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
9. This permit is issued based on toluene wipe cleanings (E14, E21A, and E44) at this source not being subject to 35 Ill. Adm. Code Part 215

Subpart E (Solvent Cleaning). Pursuant to 35 Ill. Adm. Code Part 215.181, the requirements of 35 Ill. Adm. Code Part 215.182 through 215.184 shall not apply to sources whose emissions of volatile organic material do not exceed 6.8 kg (15 lbs) in any one day, nor 1.4 kg (3 lbs) in any one hour

- 10a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the paint booth filters associated with the paint booth such that the paint booth filters are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- 11a. Emission from and operation of Spray Booth #1, and Spray Booth #3, shall not exceed the following limits:

- i. Material usage and VOM emissions for Spray Booth #1, Spray Booth #3

<u>Material</u>	<u>Coating Usage</u>		<u>VOM Emissions</u>	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Spray Booth #1 Coating	725	7250	1.24	12.44
Spray Booth #3 Coating	725	7250	1.01	<u>10.11</u>
			Total:	22.55

- ii. HAP emissions from Spray Booth #1, Spray Booth #3, and Wipe.

<u>Material</u>	<u>Single HAP Emissions</u>		<u>Combined HAP Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Spray Booth #1 Coating	0.05	0.47	0.09	0.95
Spray Booth #3 Coating and Wipe	0.13	<u>1.30*</u>	0.31	<u>3.12</u>
	Total:	<u>1.30*</u>		<u>4.07</u>

* Single HAP - Methyl Isobutyl Ketone

iii. PM emissions from Spray Booth #1 and Spray Booth #3

<u>Material</u>	PM Emissions		PM ₁₀ Emissions	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Spray Booth #1 Coating	0.0014	0.01	0.0014	0.01
Spray Booth #3 Coating	0.0012	<u>0.01</u>	0.0012	<u>0.01</u>
Total:		0.02		0.02

The limits in Conditions 11(a)(i) through (iii) are based on a spray rate of 0.16 gal/min, 8,760 hours/year of operation, and density, solids content, VOM content and HAP content of the coating (as provided by the safety data sheet for the coating).

b. i. Material Usage and VOM emissions for Paint Line 1 and Paint Line 2

<u>Material</u>	Coating Usage		VOM Emissions	
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Paint Line 1 Primer	2,291	22,910	1.28	12.78
Paint Line 1 Topcoat	1,386	13,856	0.63	6.3
Paint Line 2 Primer	2,083	20,827	0.61	6.08
Paint Line 2 Topcoat	1,386	13,856	0.63	<u>6.30</u>
Total:				31.46

ii. Material Usage and VOM emissions for Cleaning Solvent

<u>Material</u>	Coating Usage		VOM Emissions	
	<u>(Lb/Mo)</u>	<u>(Lb/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Paint Line 1 Cleaning Solvent	529	5,291	0.26	2.65
Paint Line 2 Cleaning Solvent	529	5,291	0.26	<u>2.65</u>
Total:				5.30

iii. HAP emissions from Paint Line 1, Paint Line 2, and Cleaning Solvent

<u>Material</u>	Single HAP Emissions		Combined HAP Emissions	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Paint Line 1 Primer	0.001	0.001	0.001	0.001
Paint Line 1 Topcoat	0.006	0.06	0.006	0.06

Paint Line 2 Primer	0.001	0.001	0.001	0.001
Paint Line 2 Topcoat	0.006	0.06	0.0063	0.06
Paint Line 1 Cleaning Solvent	0.26	2.65*	0.26	2.65
Paint Line 2 Cleaning Solvent	0.26	<u>2.65*</u>	0.26	<u>2.65</u>
Total:		5.30*		5.42

* Single HAP - Toluene

iv. PM emissions from Paint Line 1 and Paint Line 2

<u>Material</u>	PM Emissions		PM ₁₀ Emissions	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Paint Line 1 Primer	0.0044	0.04	0.0044	0.04
Paint Line 1 Topcoat	0.0018	0.02	0.0018	0.02
Paint Line 2 Primer	0.0035	0.04	0.0035	0.04
Paint Line 2 Topcoat	0.0018	<u>0.02</u>	0.0018	<u>0.02</u>
Total:		0.12		0.12

The Limits in Condition 11(b) (i) through (iii) are based on the maximum spray capacity of Paint Line 1 and Paint Line 2, 8,760 hours/year of operation, and density, solids content, VOM content, and HAP content of the as-applied coatings (as provided by the safety data sheet for the coating).

- c. Compliance with the annual limits of this permit 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).
- 12a. Pursuant to 40 CFR 63.11516(f) (4), if visible fugitive emissions are detected during any visual determination required in 40 CFR 40 63.11516(f) (3), you must comply with the requirements in 63.11516(f) (4) (i) and (ii).
 - i. Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 63.11516(f) (2). After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with 40 CFR 63.11517(a), "Monitoring Requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - ii. Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions and submit with your

annual certification and compliance report as required by 40 CFR 63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

- b. Pursuant to 40 CFR 63.11516(f)(5), if visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you must comply with 40 CFR 63.11516(f)(5)(i) through (iv).
 - i. Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in 40 CFR 63.11517(c), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - ii. In lieu of the requirement of 40 CFR 63.11516(f)(3) to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with 40 CFR 63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - iii. You must keep a record of each visual determination of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5)(i) or (ii), along with any subsequent corrective action taken, in accordance with the requirements in 40 CFR 63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."
 - iv. You must report the results of all visual determinations of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5)(i) or (ii), along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by 40 CFR 63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."
- c. Pursuant to 40 CFR 63.11516(f)(6), for each visual determination of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5) for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, you must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 40 CFR 63.11516(f)(2).
- d. Pursuant to 40 CFR 63.11516(f)(7), for each visual determination of emissions opacity performed in accordance with 63.11516(f)(5) for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in 63.11516(f)(7)(i) through (v).
 - i. You must submit a report of exceedance of 20 percent opacity, along with your annual certification and compliance report, as specified in 40 CFR 63.11519(b)(8), "Notification, recordkeeping,

and reporting requirements," and according to the requirements of 40 CFR 63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

- ii. Within 30 days of the opacity exceedance, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in 63.11516(f)(8). If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with 63.11516(f)(7), you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
 - iii. During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in 40 CFR 63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
 - iv. You must maintain records of daily visual determinations of emissions opacity performed in accordance with 63.11516(f)(7)(iii), during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in 40 CFR 63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."
 - v. You must include these records in your annual certification and compliance report, according to the requirements of 40 CFR 63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
- e. Pursuant to 40 CFR 63.11516(f)(8), the Site-Specific Welding Emissions Management Plan must comply with the requirements in 63.11516(f)(8)(i) through (iii).
- i. Site-Specific Welding Emissions Management Plan must contain the information in 63.11516(f)(8)(i)(A) through (F).
 - A. Company name and address;
 - B. A list and description of all welding operations which currently comprise the welding affected source;
 - C. A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
 - D. A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
 - E. A description of additional management practices and/or fume control methods to be implemented pursuant to

- 63.11516(f)(7)(ii), and the projected date of implementation; and
- F. Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to 63.11516(f)(8)(i)(D) and (E).
- ii. The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by 63.11516(f)(8)(i)(A) through (C), and submitted with your annual certification and compliance report, according to the requirements of 40 CFR 63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
- iii. You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in 40 CFR 63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."
- 13a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Condition 14 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

14. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
15. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 16a. Pursuant to 40 CFR 63.11517(a), visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.
- b. Pursuant to 40 CFR 63.11517(c), visual determination of emissions opacity (welding Tier 2 or 3) must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

- c. Pursuant to 40 CFR 63.11517(d), you must perform visual determination of emissions opacity (welding Tier 2 or 3, graduated schedule) in accordance with CFR 63.11517(c) and according to the schedule in CFR 63.11517(d) (1) through (5).
 - i. Daily Method 9 testing for welding, Tier 2 or 3. Perform visual determination of emissions opacity once per day during each day that the process is in operation.
 - ii. Weekly Method 9 testing for welding, Tier 2 or 3. If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with 63.11517(d) (1) does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of 63.11517(d) (1).
 - iii. Monthly Method 9 testing for welding Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with 63.11517(d) (2) does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of 63.11517(d) (2).
 - iv. Quarterly Method 9 testing for welding Tier 2 or 3. If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with 63.11517(d) (3) does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of 63.11517(d) (3).
 - V. Return to Method 22 testing for welding, Tier 2 or 3. If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with 63.11517(d) (3) does not exceed 20 percent, you may resume EPA Method 22 testing as in 63.11517(b) (3) and (4) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with 63.11517(d) (3) and (4).
- 17. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be

retained for at least three (3) years after the date a test is performed.

- 18a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit:
- i. Records addressing use of good operating practices for the paint booth filters associated with the paint booths:
 - A. Records for periodic inspection of the paint booth filters with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. Coating usage (gallons/month and gallons/year);
 - iii. Solvent usage (gallons/month and gallons/year);
 - iv. VOM and HAP contents of materials used (percent by weight);
 - v. The densities of coatings and solvents used (lbs/gallon);
 - vi. Certified amount of waste shipped off for disposal (tons/month and tons/year);
 - vii. Certified VOM content of the waste (percent by weight); and
 - viii. Monthly and annual emissions of PM, VOM and HAPs (individual and combined) from the source, with supporting calculations (tons/month and tons/year).
- b. All records and logs required by Condition 18(a) of this permit shall be retained at a readily accessible location at the source for at least three (3) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 19a. Pursuant to 40 CFR 63.11519(b) (1), you must prepare and submit annual certification and compliance reports for each affected source according to the requirements of 40 CFR 63.11519(b) (2) through (7). The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in 40 CFR 63.11519(b) (3).
- b. Pursuant to 40 CFR 63.11519(b) (6), the annual certification and compliance report must contain the information specified in 40 CFR 63.11519(b) (6) (i) through (iii) for each affected source which performs

- visual determination of emissions opacity in accordance with 40 CFR 63.11517(c), "Monitoring requirements."
- i. The date of every visual determination of emissions opacity;
 - ii. The average of the six-minute opacities measured by the test; and
 - iii. A description of any corrective action taken subsequent to the test.
- c. Pursuant to 40 CFR 63.11519(b) (8), as required by 40 CFR 63.11516(f) (7) (i), "Requirements for opacities exceeding 20 percent," you must prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in 40 CFR 63.11519(b) (1), and must contain the information in 40 CFR 63.11519(b) (8) (iii) (A) and (B).
- i. The date on which the exceedance occurred; and
 - ii. The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- d. Pursuant to 40 CFR 63.11519(b) (9), you must submit a copy of the records of daily visual determinations of emissions recorded in accordance with 40 CFR 63.11516(f) (7) (iv), "Tier 3 requirements for opacities exceeding 20 percent," and a copy of your Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to 40 CFR 63.11516(f) (8), "Site-specific Welding Emission Management Plan," along with your annual certification and compliance report, according to the requirements in 40 CFR 63.11519(b) (1).
20. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 21a. Pursuant to 40 CFR 63.11519(c) (3), maintain a record of the information specified in 40 CFR 63.11519(c) (3) (i) through (iii) for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c), "Monitoring requirements."
- i. The date of every visual determination of emissions opacity; and
 - ii. The average of the six-minute opacities measured by the test; and
 - iii. A description of any corrective action taken subsequent to the test.

- b. Pursuant to 40 CFR 63.11519(c) (12), if you have been required to prepare a plan in accordance with 40 CFR 63.11516(f) (7) (iii), "Site-Specific Welding Emissions Management Plan," you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.
22. The Permittee shall submit a written notification to the Illinois EPA, Bureau of Air, Compliance Section Manager, of the initial startup of the Paint Line 1, Paint Line 2, and New Business Equipment within thirty (30) calendar days of the initial start-up.
- 23a. If there is an exceedance of or deviation from the requirements of this permit as determined by the records required by this permit or otherwise, the Permittee shall submit a report to the Illinois EPA's Bureau of Air Compliance Section in Springfield, Illinois within thirty (30) days after the exceedance or deviation. The report shall identify the duration and the emissions impact of the exceedance or deviation, a copy of the relevant records and information to resolve the exceedance or deviation, and a description of the efforts to reduce emissions from, and the duration of exceedance or deviation, and to prevent future occurrences of any such exceedance or deviation.
- b. One (1) copy of required reports and notifications shall be sent to:
 - i. Via mail or overnight delivery:

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. In addition to the paper copy one electronic copy of reports and notifications concerning emission testing shall be sent to EPA.BOA.SMU@Illinois.gov. For large files, the Permittee may request to use the Illinois EPA OneDrive Request File or another approved method. Include the facility's ID Number on all correspondence.

It should be noted that the following emission units are exempt from permitting:

<u>Emission Unit</u>	<u>Exemption Citation</u>
Natural gas-fired degreasing burner (B1,E2)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired drying oven burner (B2,E3)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired burner unit for primer paint booth (B3,E5)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired burner unit for coating paint booth (B4,E9)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired burner oven (B5,E12)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired degreasing burner (B6,E2A)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired drying oven burner (B7,E6A)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired burner for primer paint booth	35 Ill. Adm. Code 201.146(fff)

(B8,E9A)

Natural gas-fired burner for coating paint booth (B10,E12A)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired burner primer flash off (B11,E20A)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired burner primer flash off (B12, E24A)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired burner oven 1 (B13,E25A)	35 Ill. Adm. Code 201.146(fff)
Natural gas-fired burner oven 2 (B14,E26A)	35 Ill. Adm. Code 201.146(fff)
Run-in machine (E46)	35 Ill. Adm. Code 201.146(aa)

If you have any questions regarding this permit, please contact Paul Osazuwa at 217/785-1705.

William D. Marr

William D. Marr
Manager, Permit Section
Bureau of Air

WDM:PO:tan



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act, and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The Permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emission of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. 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 proposed facilities,
 - c. does not release the Permittee from compliance with the other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
- 6.
- a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
 - b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.