

217/782-2113

"REVISED"
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

L & P Acquisition Company - 46
Attn: Dale W. Pashea
26th & U.S. Highway 50 West
Post Office Box 180
Carlyle, Illinois 62231

Application No.: 88080043
Applicant's Designation:
Subject: Paint Booths
Date Issued: May 29, 1996
Location: 26th & Franklin, Carlyle

I.D. No.: 027030AAW
Date Received: March 3, 1995
Expiration Date: May 29, 2001

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of paint booths for coating plastic parts and control system for PM control as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of volatile organic material and hazardous air pollutants (HAPs) from the source to less than major source thresholds (i.e., 100 tons/year for VOM, 10 tons/year for a single HAP and 25 tons/year for totaled HAPs), as further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program permit.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) for this location.
- 2a. Coating usage, coating volatile organic material (VOM) content and emissions of VOM from the paint booths shall not exceed the following:

<u>Type of Coating</u>	<u>Coating Usage</u>		<u>Coating VOM Content</u>	<u>VOM Emissions</u>
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)*</u>	<u>(Lb/Gal)*</u>	<u>(Lb/Yr)</u>
Water-based Coatings	2,000	20,000	2.5	50,000 = 25.0 t/yr
Urethane-based Coating as applied	1,000	9,900	6.1	60,300 = 30.3 t/yr

(Continued)

Type of Coating	Coating Usage		Coating VOM Content	VOM Emissions
	(Gal/Mo)	(Gal/Yr)*	(Lb/Gal)*	(Lb/Yr)
Conductive and/or Photochemically Reactive Coating Including Thinner	500	4,600	6.5	29900 = 15.0 t/yr
Lacquer	250	1,650	6.0	9900 = 5.0 t/yr
Cleaning Solvent	300	2,900	7.0	20300 = 10.2 t/yr
Grand Total =				85.5 t/yr

*Excluding water

- b. Water-based coatings as received shall only be thinned with water.
- c. Any coating with a photochemically reactive solvent mixture as defined in 35 Ill. Adm. Code 211.4690 may not be applied at a rate which results in organic material emissions in excess of 8 lb/hour pursuant to 35 Ill. Adm. Code 215.301. Since lacquer contains 6.0 lb VOM per gallon, no more than 1.3 gallons may be used in any hour.
3. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Agency. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Agency.
4. Compliance with annual limits for VOM shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
- 5a. The Permittee shall maintain monthly records of the following items:
 - i. Coating, lacquer, thinner and solvent usages (gal/month).
 - ii. VOM content of all materials.
 - iii. HAP content of all materials.

- iv. VOM and HAP content of any waste sent offsite for which credit is claimed.
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least 3 years from the date of entry and shall be made available for inspection and copying by the Agency and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Agency request for records during the course of a source inspection.
- 6. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance Unit 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.

The following special conditions are not federally enforceable:

- 7. All reports (notification, tests, reports, etc.) shall be sent to:

Illinois EPA
Bureau of Air
Compliance Unit (#39)
P.O. Box 19276
Springfield, Illinois 62794-9276

and

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
2009 Mall Street
Collinsville, Illinois 62234

- 8. The Permittee shall maintain the water curtain on the spray booths so as to function at the stated recovery efficiency of 99.3%. This maintenance shall include lubricating all surfaces, cleaning nozzles and water header pipes for proper water flow and centrifuging, and flushing basins which collect paint overspray.
- 9. 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.

Page 4

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Usages listed in Special Condition 2a. If there have been no exceedance during the prior calendar year, the Annual Emission Report shall include a statement to that effect.
11. The following Standard Conditions are not federally enforceable: Standard Conditions 3(a), 8, 9, 10, and 11.

If you have any questions on this permit, please call Dan Punzak at 217/782-2113.

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

DES:DGP:jar\8

cc: IEPA, FOS Region 1
IEPA, Compliance Unit
USEPA

Attachment A - Emission Summary

This attachment provides a summary of the maximum emission from the paint booths used for coating plastic parts operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Agency used the annual operating scenario which results in maximum emissions from such a plant. This handling of 39,050 gallons of coatings, lacquers and cleaning solvents with specific limits on VOM content for various types of material results in maximum emissions are well below the levels, e.g., 100 tons/yr of VOM and 10 tons/yr of Hazardous Air Pollutants (HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from will be less than predicted in this summary to the extent that less material is handled.

- 1a. Coating usage, coating volatile organic material (VOM) content and emissions of VOM from the paint booths shall not exceed the following:

<u>Type of Coating</u>	<u>Coating Usage</u>		<u>Coating VOM Content</u>	<u>VOM Emissions</u>
	<u>(Gal/Mo)</u>	<u>(Gal/Yr)*</u>	<u>(Lb/Gal)*</u>	<u>(Lb/Yr)</u>
Water-based Coatings	2,000	20,000	2.5	50,000 = 25.0 t/yr
Urethane-based Coating as applied	1,000	9,900	6.1	60,300 = 30.3 t/yr
Conductive and/or Photochemically Reactive Coating Including Thinner	500	4,600	6.5	29900 = 15.0 t/yr
Lacquer	250	1,650	6.0	9900 = 5.0 t/yr
Cleaning Solvent	300	2,900	7.0	20300 = 10.2 t/yr
Grand Total =				85.5 t/yr

*Excluding water

- b. Water-based coatings as received shall only be thinned with water.
2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Agency.

Illinois Environmental Protection Agency
Division of Air Pollution Control
1340 N. Ninth Street
Springfield, Illinois
January, 1996

Statement of Basis
For Proposed Issuance of
A Federally Enforceable State Operating Permit for
Pulsar Plastics, Inc.

Applicant:

Name: Pulsar Plastics, Inc.
Address: P.O. Box 180
Carlyle, Illinois 62231

Contact Person: Jim Lutkewilte
Contact Person Phone: 618/594-3692

Project:

Project: Paint Booths
Project Location: 26th and Franklin, Carlyle

Plant Name: Pulsar Plastics, Inc.
Location Identification Number: 027030AAW
Application Number: 88080043

Significant Dates:

Application Received: March 3, 1995
Comment Period Begins: February , 1996
Comment Period Ends: March , 1996

Illinois EPA Contacts:

Permit Section - Name: Dan Punzak
Address: 1340 N. Ninth Street
P.O. Box 19506
Springfield, Illinois 62794-9506
Telephone: 217/782-2113

Telecommunications Device for Deaf: 217/782-9143

Field Operations Section - Name: Sarah Phelps
Address: 2009 Mall Street
Collinsville, Illinois 62236
Telephone: 618/346-5120

PROJECT SUMMARY

I. INTRODUCTION

An application has been voluntarily submitted for an existing coating facility in order to voluntarily incorporate federally enforceable limits. These limits would prevent this facility from being a major source or emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by record keeping and reporting requirements to assure that the facility is operated as a non-major source. These conditions would be enforceable by both the State of Illinois and USEPA.

II. SOURCE DESCRIPTION

Pulsar Plastics manufactures plastic parts using an injection molding process beginning with thermoplastic beads. In addition to fabricating the plastic parts, many of them have to be painted. The solvents in the paints are volatile organic materials (VOM), some of which are hazardous air pollutants (HAPs).

III. EMISSIONS

The principal air contaminant of concern for the facility is VOM from the organic solvents in the paints. The solvents are a vital component of paint which allow the proper application of paint solids through the application equipment to the plastic surface. Pulsar uses several types of coatings with different amounts of VOM in each gallon. Each type has a usage and VOM content limits which total to less than 100 ton/yr. Cleaning solvent, also a VOM, is also limited. Some of the VOMs are HAPs. HAP limits are based on actual emissions.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with Illinois Pollution Control Board emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. This site readily complies with all applicable Board standards.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on the amount of coating used and the VOM content of the coatings. These limitations are consistent with the historical operation of the operation. The permit conditions also establish appropriate compliance procedures, including inspection practices, record keeping requirements, and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the coating operation is within the limitations set by the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois Environmental Protection Agency's preliminary determination that this printing facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois Environmental Protection Agency is therefore proposing to issue a permit with federally enforceable limits for this operation.

Comments are requested on this proposed action by the Illinois Environmental Protection Agency and the proposed conditions on the draft permit. Comments must be sent to Dan Punzak and postmarked by March , 1996.

If substantial public interest is shown in this matter, the Illinois Environmental Protection Agency will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

DGP:jar

217/782-2113

May 29, 1996

Pulsar Plastics, Inc.
Attn: Jim Lutkewitte
P.O. Box 180
Carlyle, Illinois 62231

Re: Site Fee Reconsideration
I.D. #027030AAW

Dear Mr. Lutkewitte:

This is in response to your letter dated April 7, 1995 requesting reconsideration of the annual air pollution site fee.

The Agency has reviewed your request and your annual air pollution site fee has been reduced from \$1,971.00 to \$1,000.00. During our review it was discovered that the emissions reflected in our computer were not consistent with that of your site and have been corrected to be similar to your FESOP which is being sent at this time.

Attached is a site fee invoice, which reflects the Agency's determination. If your invoice indicates an amount due, payment is due to the Agency 30 days from the date on the invoice. If a credit amount is shown it will be credited to your site for future billings. No monies will be refunded. The invoice reflects all monies owed and/or paid for current billing year, unless otherwise stated.

If you have any questions, please call Dan Punzak at 217/782-2113.

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

DES:DGP:jar

cc: Fiscal Services
Region 3

217/782-2113

October 19, 1999

L & P Acquisition Company - 46
Attn: Dale W. Pashea
26th & U.S. Highway 50 West
Post Office Box 180
Carlyle, Illinois 62231

I.D. No.: 027030AAW

Dear Mr. Pashea:

Enclosed is a revised permit letter which reflects only a change of ownership. Please note that if you have changed or intend to change this operation it will be necessary to apply for revision of your air pollution permit(s).

If you have any questions or require any assistance concerning these matters, contact Karen Luparell at 217/782-2113.

Very truly yours,

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

DES:KJL:88080043:psj

Enclosure

cc: Region 3
I.D. File
Permit File