

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Rodgers Engineering Corporation, Molding Div.  
Attn: Mr. Donald Mark  
330 South Fairbank Street  
Addison, Illinois 60101

<u>Application No.:</u> 97120036	<u>I.D. No.:</u> 043005AMJ
<u>Applicant's Designation:</u> ROEN02-AMD	<u>Date Received:</u> February 17, 2005
<u>Subject:</u> Molding Machines Producing Plastic Parts	
<u>Date Issued:</u> July 25, 2005	<u>Expiration Date:</u> July 25, 2010
<u>Location:</u> 330 South Fairbank Street, Addison	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 34 molding machines and a post bake oven pursuant to 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:
  - i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year of volatile organic material (VOM) 10 tons/year for each single hazardous air pollutant (HAP) and 25 tons/year for all HAPs combined). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. To limit the emissions of volatile organic material from the source to less than 25 tons/year. As a result, the source is excluded from the requirements of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.

2. Emissions and operation of the 34 plastic injection molding machines shall not exceed the following limits, including clean-up solvents:

<u>Material</u>	Usage		Emission Factor	HAP Emissions
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(% by wt.)</u>	<u>(Tons/Yr)</u>
Styrene	33	331	3	9.95

VOM Usage and Emissions  
(Tons/Year)

20

These limits are based on standard AP-42 emission factors from Section 4.4, Polyester Resin Manufacturing and limits requested in the permit application. Compliance shall be determined from a running total of 12 months of data.

- 3a. The Permittee shall operate the source in accordance with 35 Ill. Adm. Code 218.660 thru 218.692, Subpart CC: Polyester Resin Product Manufacturing Process.
- b. Only closed molding processes with less than 4% emissions from resins shall be allowed, pursuant to 35 Ill. Adm. Code 218.666(a) (1) (B).
- c. i. For polyester resin materials used for products requiring corrosion resistant or fire retardant materials, a monomer content of no more than 48% by weight;
- ii. For polyester resin materials for products requiring a tensile strength of 10,000 psi or more, including tooling resins, a monomer content of no more than 48% by wt. as applied;
- iii. For clear gel coat, a monomer content of no more than 50% by wt. as applied;
- iv. For other pigmented gel coats, a monomer content of no more than 45% by wt. as applied; or
- v. For all other polyester resin materials, a monomer content of no more than 35% by wt. as applied.
4. Emissions and operation of the post bake oven shall not exceed the following limits:

Natural Gas Usage		E M I S S I O N S				VOM	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	NO <sub>x</sub>	CO				
		<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
1	10	0.05	0.5	0.04	0.42	0.003	0.03

These limits are based on standard AP-42 emission factors and the maximum natural gas usage. Compliance shall be determined from a running total of 12 months of data.

5. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the equipment covered under this permit such that the equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
6. 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.
7. The Permittee shall maintain monthly records of the following items:
  - a. Amount of each material used and monomer content (lb/month, % content);
  - b. VOM and HAP usage (tons/month);
  - c. Natural gas usage (mmscf/month and mmscf/year); and
  - d. CO, NO<sub>x</sub>, VOM, single HAP and total HAP emissions with supporting calculations (tons/month and tons/year).
8. 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 Illinois EPA. 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 Illinois EPA.
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three 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) 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.
10. 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 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.

11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

If you have any questions on this, please call Randy Solomon at 217/782-2113.

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

DES:RBS:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from plastic molding operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is handling 331 tons/year of styrene. The resulting maximum emissions are below the levels, e.g., 25 tons per year of VOM, 25 tons per year of total HAPs and 10 tons per year of single HAPs, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Equipment/Material</u>	<u>VOM</u> <u>(Tons/Yr)</u>	<u>HAPs</u>		<u>NO<sub>x</sub></u> <u>(Tons/Yr)</u>	<u>CO</u> <u>(Tons/Yr)</u>
		<u>Single</u> <u>(Tons/Yr)</u>	<u>Combined</u> <u>(Tons/Yr)</u>		
34 Molding Machines	20	< 10	< 25		
Natural Gas	<u>0.03</u>			<u>0.5</u>	<u>0.42</u>
Totals:	<u>20.03</u>	<u>&lt; 10</u>	<u>&lt; 25</u>	<u>0.5</u>	<u>0.42</u>

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