

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Bell Sports, Inc.  
Attn: Chuck Giebel, Plant Manager  
1924 County Road, 3000N  
Rantoul, Illinois 61866

Application No.: 07050013

I.D. No.: 019817AAH

Applicant's Designation:

Date Received: May 7, 2007

Subject: Helmets Assembly Plant

Date Issued: September 15, 2008

Expiration Date: September 15, 2013

Location: 1924 County Road, 3000N, Rantoul, Champaign County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one helmet assembly process, one helmets coating operation, one 1,750 kW diesel-powered emergency generator, natural gas-fired comfort heating units, and a pad-printing operation 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. This federally enforceable state operating permit (FESOP) is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single HAP and 25 tons/year of any combination of such HAPs). As a result, the source is excluded from the requirements 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 establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP.
- 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.

- 2a. 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 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.321(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 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 subsection (c) of 35 Ill. Adm. Code 212.321.
3. Pursuant to 35 Ill. Adm. Code 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
4. Pursuant to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, 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 215 Subpart K shall apply only to photochemically reactive material.
5. This permit is issued based on the 1,750 kW diesel-powered emergency generator not being subject to the New Source Performance Standard (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60 Subpart IIII because the stationary compression ignition internal combustion engine was manufactured prior to April 1, 2006.
- 6a. In the event that the operation of this emission unit 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 comfort heating units shall only be operated with natural gas as the fuel. The use of any other fuel in the comfort heating units requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- c. The diesel-powered emergency generator shall only be operated with distillate fuel as the fuel. The use of any other fuel in the diesel-powered emergency generator requires that the Permittee first obtain a construction permit from the Illinois EPA and then perform stack testing to verify compliance with all applicable requirements.
- d. Organic liquid by-products or waste materials shall not be used in any emission unit at this source without written approval from the Illinois EPA.
- e. The Illinois EPA shall be allowed to sample all fuels stored at the above location.
- 7a. VOM emissions from football helmets painting and clean-up operations shall not exceed 1.7 tons/month and 17.0 tons/year.

- b. The VOM emissions from adhesive application on baseball helmet assembly line shall not exceed 0.5 tons/month and 4.9 tons/year.
- c. The VOM and HAP emissions shall be determined from the following equation on a monthly basis:

$$E = \sum (M_i \times C_i)$$

Where:

E = VOM emissions (tons);

M<sub>i</sub> = VOM/HAP-containing material usage (tons); and

C<sub>i</sub> = VOM/HAP content of the raw material (fraction).

- d. The above limitations were established in Permit 06060006, pursuant to 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 Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21.
- e. Operation and emissions of the diesel emergency generator shall not exceed the following limits:
  - i. Operating Hours: 200 hours/month, 200 hours/year; and
  - ii. Emissions from the emergency generator:

<u>Pollutant</u>	<u>Emission Rate</u> (lbs/Hour)	<u>Emissions</u>	
		(Tons/Month)	(Tons/Year)
Nitrogen Oxides (NO <sub>x</sub> )	61.2	6.1	6.1
Carbon Monoxide (CO)	16.4	1.6	1.6
Sulfur Dioxide (SO <sub>2</sub> )	4.6	0.5	0.5
Particulate Matter (PM)	1.2	0.1	0.1
Volatile Organic Material (VOM)	1.4	0.1	0.1

These limits are based on the maximum engine operation rate, sulfur content of the fuel less than 0.2% and engine manufacturer's emission factors.

- f. Operation and emissions of the natural gas-fired comfort heating units shall not exceed the following limits:
  - i. Natural Gas Usage: 11.6 mmscf/month, 116 mmscf/year; and
  - ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Rate</u> (lbs/mmscf)	<u>Emissions</u>	
		(Tons/Month)	(Tons/Year)
Nitrogen Oxides (NO <sub>x</sub> )	100	0.58	5.80
Carbon Monoxide (CO)	84	0.49	4.88
Particulate Matter (PM)	7.6	0.05	0.44
Volatile Organic Material (VOM)	5.5	0.04	0.32
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.04

These limits are based on the maximum equipment operations and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

- g. Operation and emissions of the pad-printing operation shall not exceed the following limits:

Organic Solvent Usage		VOM Emissions	
<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
75	750	0.23	2.25

These limits are based on maximum emissions and material balance.

8. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emission of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA and the requirements of the NESHAP for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP.
9. 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).
- 10a. Pursuant to 35 Ill. Adm. Code 212.282, 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 11 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

- 11a. Pursuant to 35 Ill. Adm. Code 212.107, for both fugitive and nonfugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. 35 Ill. Adm. Code 212.107 Supart A shall not apply to 35 Ill. Adm. Code 212.301.
  - b. Pursuant to 35 Ill. Adm. Code 212.109, except as otherwise provided in 35 Ill. Adm. Code Part 212, and except for the methods of data reduction when applied to 35 Ill. Adm. Code 212.122 and 212.123, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and the procedures in 40 CFR 60.675(c) and (d), if applicable, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.
  - c. Pursuant to 35 Ill. Adm. Code 212.110(a), measurement of particulate matter emissions from stationary emission units subject to 35 Ill. Adm. Code Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E.
  - d. Pursuant to 35 Ill. Adm. Code 212.110(b), the volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4.
  - e. 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.
12. 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.

13. 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.
- 14a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions of this permit
  - i. Names and amounts of VOM/HAP-containing materials used (tons/month and tons/year);
  - ii. VOM and HAP content of VOM/HAP-containing materials (% by weight);
  - iii. Diesel generator operating hours (hours/month and hours/year);
  - iv. The sulfur content of the distillate fuel oil used in the generator provided by the supplier fuel oil (weight %);
  - v. Natural gas usage (mmscf/month and mmscf/year); and
  - vi. Monthly and annual NO<sub>x</sub>, CO, SO<sub>2</sub>, PM, VOM and HAP emissions with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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.
15. If there is an exceedance of or deviation from 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 and Enforcement Section in Springfield, Illinois within 30 days after the exceedance/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
16. 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.
17. Two (2) copies of required reports and notifications 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  
2009 Mall Street  
Collinsville, Illinois 62234

It should be noted that the above-ground diesel storage tanks are exempt from permitting pursuant to 35 Ill. Adm. Code 201.146(n)(3).

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

Edwin C. Bakowski, P.E.  
Acting Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

ECB:DWH:jws

cc: Illinois EPA, FOS Region 3  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the printing plant 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. The resulting maximum emissions are below the levels (e.g., 100 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled 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>Emission Unit</u>	E M I S S I O N S (Tons/Year)						Single <u>HAP</u>	Total <u>HAPs</u>
	<u>VOM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>PM</u>	<u>SO<sub>2</sub></u>			
Football Helmets Paint Booth	17.0							
Baseball Helmets Assembly Line	4.9							
Diesel Generator	0.1	6.10	1.60	0.10	0.5			
Comfort Heating Units	0.32	5.80	4.88	0.44	0.04			
Pad-Printing Operation	2.25							
Totals	<u>24.57</u>	<u>11.90</u>	<u>6.48</u>	<u>0.54</u>	<u>0.54</u>	<u>9.0</u>	<u>22.5</u>	

DWH:jws