

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Collins & Aikman - Rantoul Products Plants No. 2 and 3
Attn: Donald Golden, Environmental Manager
300 Shelhouse Drive
Rantoul, Illinois 61866

| | |
|---|---------------------------------------|
| <u>Application No.:</u> 00020053 | <u>I.D. No.:</u> 019065ABJ |
| <u>Applicant's Designation:</u> | <u>Date Received:</u> May 29, 2007 |
| <u>Subject:</u> Interior Parts and Accessories for Motor Vehicles Manufacturing | |
| <u>Date Issued:</u> June 1, 2007 | <u>Expiration Date:</u> April 9, 2012 |
| <u>Locations:</u> Plant No. 3 - 735 Pacesetter Drive, Rantoul | |
| Plant No. 2 - 707 Veterans Parkway, Rantoul | |

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 7 paint and adhesive spray booths (including 2 new adhesive application booths SB3-3 and SB3-4), utility chemicals, injection molding process, plastic storage silos, regrind system with cyclonic capture system, hydraulic oil storage tanks, foam injection line, miscellaneous maintenance, cutting, welding, portable vacuum cleaner, natural gas-fired comfort heaters, plastic resin transfer, resin storage and resin drying equipment, 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., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). 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. This permit is issued based upon the source not being 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. This is consequence of the federally enforceable production and operating limitations, which restrict a 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, being established prior to the Compliance Date for existing sources listed in 40 CFR 63.4483(b).
- b. For purposes of Title I of the Clean Air Act and Section 39.5 of the Illinois Environmental Protection Act (Act), Collins & Aikman - Rantoul Products Plant No. 3 is considered a single source with Collins & Aikman - Rantoul Products Plant No. 2 (I. D. No. 019065ABH, located at 707 Veterans Parkway Rantoul).

- c. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- d. This permit supersedes all operating permit(s) 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.
- 4a. 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/hours) 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.
- b. 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.
- 5a. Operations and VOM emissions from the paint and adhesive spray booths shall not exceed the following limits:

| <u>Paint/Solvent Usage</u> | | <u>VOM Emissions</u> | | <u>PM Emissions</u> | |
|-----------------------------|---------------------|----------------------|----------------------------|---------------------|------------------|
| <u>(Gallons/Mo)</u> | <u>(Gallons/Yr)</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> |
| 16,860 | 108,400 | 13.5 | 87.0 | 2.2 | 14.08 |
| <u>Single HAP Emissions</u> | | | <u>Total HAP Emissions</u> | | |
| <u>(Lbs/Mo)</u> | | <u>(Tons/Yr)</u> | <u>(Lbs/Mo)</u> | | <u>(Tons/Yr)</u> |
| 1,800 | | 9.0 | 4,500 | | 22.5 |

These limits are based on the maximum actual emissions that result from operation at the maximum rates.

- b. The VOM emissions shall be calculated using the following equations:

$$\text{Coating VOM Emissions} = \text{Amount of Coating used} \times \text{VOM Content of Coating}$$

$$\text{Solvent VOM Emissions} = \text{Amount of Cleaning Solvent Used} \times \text{VOM Content of Solvent}$$

6. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP) permit.
7. Operation and emissions of the natural gas fired heating equipment shall not exceed the following limits:

Natural Gas Usage: 7.2 mmscf/month and 72 mmscf/year

| <u>Pollutant</u> | <u>Emission Factor (Lbs/mmscf)</u> | <u>Emissions</u> | |
|------------------------------------|--|---------------------|--------------------|
| | | <u>(Tons/Month)</u> | <u>(Tons/Year)</u> |
| Nitrogen Oxides (NO _x) | 100 | 0.36 | 3.60 |
| Carbon Monoxide (CO) | 84 | 0.30 | 3.02 |
| Volatile Organic Materials (VOM) | 5.5 | 0.03 | 0.20 |
| Particulate Matter (PM) | 7.6 | 0.04 | 0.28 |
| Sulfur Dioxide (SO ₂) | 0.6 | 0.01 | 0.02 |

These limits are based on the maximum equipment operations and standard emission factors give by AP-42.

8. Operation and PM emissions from the following equipment shall not exceed the following limits:

| <u>Equipment</u> | <u>Particulate Matter Emissions</u> | |
|--|-------------------------------------|--------------------|
| | <u>(Lbs/Month)</u> | <u>(Tons/Year)</u> |
| Miscellaneous Maintenance, Cutting & Welding | 800 | 4.38 |

These limits are based on the actual emissions that result from maximum operation of the above equipment.

9. This permit is issued based on negligible emissions of volatile organic material from the injection molding process, foam injection line and oil tanks. For this purpose, emissions shall not exceed nominal emission rates of 0.44 tons/year.

10. This permit is issued based on negligible emissions of particulate matter from the regrind system, plastic storage silos, portable vacuum cleaners, plastic resin transfer, resin storage and resin drying equipment. For this purpose, emissions shall not exceed nominal emission rates of 0.44 tons/year.
11. 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 63.10(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.
- b. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Monthly and annual usage of coatings, adhesives, utility chemicals and solvents (gallons/month and gallons/year);
 - ii. VOM and HAP contents of materials used;
 - iii. Natural gas usage (mmscf/month and mmscf/year); and
 - iv. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM and HAPs (individual and combined) with supporting calculations (tons/month and tons/year).

13. 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.
14. 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 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.
15. 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 this permit has been revised to include operation of 2 new adhesive application booths as described in Construction Permit 07050005.

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

ECB:DWH:psj

cc: Illinois EPA, FOS Region 3
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from this source 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 HAP, 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 used 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) | | | | | | <u>Single HAP</u> | <u>Total HAPs</u> |
|-----------------------------------|-------------------------------|-----------------------|-----------|-----------|-----------------------|------|-------------------|-------------------|
| | <u>VOM</u> | <u>NO_x</u> | <u>CO</u> | <u>PM</u> | <u>SO₂</u> | | | |
| Coating Operations | 87.00 | | | 14.08 | | 9.0 | 22.5 | |
| Heating Equipment | 0.20 | 3.6 | 2.5 | 0.28 | 0.02 | | | |
| Miscellaneous Maintenance | | | | | | | | |
| Cutting and Welding | | | | 4.38 | | | | |
| Injection Molding Process-Plant 2 | 0.44 | | | | | | | |
| Oil Tanks-Plant 2 | 0.44 | | | | | | | |
| Injection Molding-Plant 3 | 0.44 | | | | | | | |
| Oil Tanks-Plant 3 | 0.44 | | | | | | | |
| Plastic Storage Silos-Plant 2 | | | | 0.44 | | | | |
| Portable Vacuum-Plant 2 | | | | 0.44 | | | | |
| Resin Transfer, Store and | | | | | | | | |
| Drying-Plant 2 | | | | 0.44 | | | | |
| Regrind System-Plant 3 | | | | 0.44 | | | | |
| Plastic Storage Silos-Plant 3 | | | | 0.44 | | | | |
| Portable Vacuum-Plant 3 | | | | 0.44 | | | | |
| Resin Transfer, Storage and | | | | | | | | |
| Drying-Plant 3 | | | | 0.44 | | | | |
| Totals | 88.96 | 3.6 | 2.5 | 18.74 | 0.02 | < 10 | < 25 | |

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