

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
RENEWAL

PERMITTEE

Forsheda Engineering Seals
Attn: Jim Pryor
815 Payne Drive
Vandalia, Illinois 62471

Application No.: 72120686
Applicant's Designation:
Subject: Rubber Molding Company
Date Issued:
Location: 815 Payne Drive, Vandalia

I.D. No.: 051817AAB
Date Received: November 6, 2001
Expiration Date:

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a mixer, two mill processes, extruder, molding process, hot air cure process, and case preparation process 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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for total 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.
- 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 of volatile organic material (VOM) and HAPs and operation of the listed equipment shall not exceed the following limits:

<u>Equipment</u>	<u>Throughput</u>		<u>Emission Factors</u>		<u>VOM Emissions</u>		<u>HAP Emissions</u>	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(Lb/T)</u>	<u>(Lb/T)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Mixer	500	1,700	0.886	0.3	0.23	0.75	0.08	0.26
Mill 1	500	1,700	0.224	0.05	0.06	0.20	0.02	0.04
Mill 2	500	1,700	0.224	0.05	0.06	0.20	0.02	0.04
Extruder	500	1,700	0.036	0.075	0.01	0.03	0.02	0.06
Molding	500	1,700	4.86	10.26	1.22	4.13	2.57	8.72
Cure Process	80	275	3.36	4.06	0.14	0.50	0.17	0.56
				Total	1.72	5.81	2.88	9.68

These limits define the potential emissions of VOM/HAPs and are based on requested yearly throughputs and special emission factors from the Rubber Manufacturers Association (RMA). Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

3. Emissions of volatile organic material, VOM and HAPs, and operation of the case preparation process shall not exceed the following limits:

VOM/HAP Usage		VOM/HAP Emissions	
(Ton/Mo)	(Ton/Yr)	(Ton/Mo)	(Ton/Yr)
1.75	15.0	1.75	15.0

These limits define the potential emissions of VOM/HAPs and are based on individual solvent usages, individual VOM/HAP content, and limits as requested by the company. VOM/HAP usage shall be calculated according to the equation in Condition 7d. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

4. Emissions of particulate matter and operation of the listed equipment shall not exceed the following limits:

Item of Equipment	Throughput		Emission Factor (Lb/Ton)	PM Emissions	
	(Ton/Mo)	(Ton/Yr)		(Ton/Mo)	(Ton/Yr)
Mixer	500	1,700	1.85	0.47	1.57
Extruder	500	1,700	0.053	0.02	0.1

These limits define the potential emissions of PM and are based on requested yearly throughputs and special emission factors from the Rubber Manufacturers Association (RMA). Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

5. 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), and Section 112(G) of the Clean Air Act.
6. 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.

7. The Permittee shall maintain monthly records of the following items:
- a. Material throughput for each equipment listed in Condition 2 (ton/mo and ton/yr);
 - b. Amount of each solvent used in the case preparation process (gal or lb/mo and gal or lb/yr);
 - c. VOM and individual HAP content of each solvent used in the case preparation process (lb VOM/gal or percent weight);
 - d. Calculation of VOM and individual HAP usage in the case preparation process. The following equation shall be used to calculate VOM/HAP usage:

$$Te = \sum_i^n AiBi$$

Where:

Te = VOM or HAP usage in units of lb/mo

n = Number of different solvents used

i = Subscript denoting an individual solvent

Ai = Weight of VOM/HAP per volume of each solvent used each month in units of lbs VOM or HAP/gal or weight percent of VOM/HAP of each solvent used each month (% weight)

Bi = Amount of each solvent used each month in units of gal/mo or lb/mo

- e. Detailed calculations of VOM and individual and total HAP emissions (ton/mo and ton/yr).
8. 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.
9. 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.

10. 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
2009 Mall Street
Collinsville, Illinois 62234

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: material throughput per year and calculations of VOM and HAP emissions from the prior calendar year.

If there have been no exceedance during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

It should be noted that the boilers and heaters are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(c).

If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

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

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cc: Illinois EPA, FOS Region 3
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from rubber molding facility operating in compliance with the requirements of this federally enforceable permit 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 well below the levels, e.g., 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for total 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.

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