

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
RENEWAL

PERMITTEE

Marblecast Products, Inc.
Attn: Charles E. Wassenaar
2211 South Foster Avenue
Wheeling, Illinois 60090

Application No.: 94060020 I.D. No.: 031324ADX
Applicant's Designation: GELCOATSPR Date Received: April 23, 2001
Subject: Gel-Coat Spray Booth and Resin Mixing
Date Issued: October 11, 2002 Expiration Date: October 11, 2007
Location: 2211 South Foster Avenue, Wheeling

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one gel-coat spray booth for plastic bathroom fixtures, one resin mixing operation with multiple mixers, grinding, sanding and polishing operation with dust collectors 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., 25 tons/year of VOM, 10 tons/year for a single HAP and 25 tons/year for totaled HAP). 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.
- 2a. Pursuant to 35 Ill. Adm. Code 218.666(a)(1)(A)(iii), monomer content for clear gel coats shall not exceed 50% by weight as applied.
- b.
 - i. Pursuant to 35 Ill. Adm. Code 218.666(a)(1)(A)(iv), the monomer content for other pigmented gel coats shall not exceed 45% by weight as applied.
 - ii. Notwithstanding Condition 2(b)(i), pigmented gel coats with monomer content greater than 45% may be used, if the actual sum of the daily weighted average emissions of all resins, clear gel coats and pigmented gel coats for that day shall not exceed the sum of the daily weighted average emissions that would be allowed based on the maximum allowable monomer content as indicated in Condition 2(a), (b)(i) and (c) for gel coats and resins used.

c. Pursuant to 35 Ill. Adm. Code 218.666(a)(1)(A)(v), the monomer content for resins shall not exceed 35% by weight as applied.

3a. The Permittee shall not exceed the following limits:

VOM Emissions
(Tons/365 Days)

9.66

b. Compliance with annual emission limits shall be determined based on a running total of 365 days of data, i.e., the current days data plus the preceding 364 days.

c. The emissions of VOM shall be calculated using the gel coats and resins used, the monomer content of the gel coats and resins and standard emission factors for "Polyester Resin Plastic Products Fabrication" of AP-42, Section 4.4 compiled by USEPA.

d. Compliance with these limits shall be determined from the recordkeeping required by Condition 5.

4. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs. If USEPA establishes by rule a lesser quantity of HAPs which would require the Permittee to obtain a CAAPP permit from the Illinois EPA, then the Permittee shall do so consistent with the applicable law. 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.

5a. The Permittee shall maintain the following records to check compliance with the limitations of this permit.

i. Name and identification of each gel-coat and resin used

ii. The weight percent monomer content and amount of each gel coat and resin used in lbs/day.

iii. VOM emissions in lbs/day.

iv. Each day the Permittee shall record the annual VOM emissions summing the day's VOM emission data and the previous 364 days of data.

v. On any day when pigmented gel coat with monomer content greater than 45% is used, the Permittee shall calculate the actual sum of the daily weighted average emissions of all resins, clear gel coat and pigmented gel coats used for that day and also, the daily weighted average emissions based on the actual usage and

maximum allowable monomer content as indicated in Condition 2(a), (b) (i), and (c).

- b. 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 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 Illinois EPA 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 Illinois EPA'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.
7. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year:
 - a. Annual clear gel coat and pigmented gel coat usage
 - b. Annual resin usage

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

8. 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

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If you have any questions on this, please call John Blazis 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 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions of plastic fixture manufacturing 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. This plant is using 41.05 tons of gel coat and 575 tons of resin. The resulting maximum emissions are well below the levels at which this source would be considered a major source for purpose of the Clean Air Act Permit Program. Actual emissions from the source will be less than predicted in this summary to the extent that less material is handled e.g., amount of resin used.

1. Emissions of volatile organic material from the facility wide operation:

VOM Emissions
(Tons/365 Days)

9.66

The emissions of VOM shall be calculated using the gel coats and resins used, the monomer content of the gel coats and resins and standard emission factors for "Polyester Resin Plastic Products Fabrication" of AP-42 Section 4.4 compiled by USEPA.

2. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs. If USEPA establishes by rule a lesser quantity of HAPs which would require the Permittee to obtain a CAAPP permit from the Illinois EPA, then the Permittee shall do so consistent with the applicable law. 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.

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