

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

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

Application No.: 97120036 I.D. No.: 043005AMJ
Applicant's Designation: Date Received: December 12, 1997
Subject: Molding Machines Producing Plastic Parts
Date Issued: Expiration Date:
Location: 330 South Fairbank Street and 230 South Lombard Road, Addison

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of 32 molding machines 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 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.
 - 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 source shall not exceed the following limits, including clean-up solvents:

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

VOM Emissions
(Tons/Yr)

20

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

3. This permit is issued based on emissions of VOM not exceeding 8 lb/hour for any emission unit, pursuant to 35 Ill. Adm. Code 218.301.
4. 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.
5. Except as stated in 35 Ill. Adm. Code 218.666(a)(1)(A)(i), (iii) and (iv), the monomer content of any polyester resin material with a tensile strength of 10,000 psi or more, including tooling resins, shall not exceed 48% by wt. as applied and all other polyester resin materials shall not exceed 35% by wt. as applied pursuant to 218.666(a)(1)(A)(ii) and (v).
6. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.
7. 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, including but not limited to, changes in raw materials or installation of controls in order to eliminate the odor nuisance.
8. 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); and
 - c. VOM, single HAP and total HAP emissions (tons/month and tons/year).

9. 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.
10. 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.
11. 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.
12. 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
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

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13. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: Amount of each material used and monomer content, VOM and HAP usage and VOM and HAP emissions.

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
Illinois EPA, Compliance Section
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 and 331 tons/year of vinyl toluene. The resulting maximum emissions are well 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.

- 1a. The emissions of volatile organic material (VOM) from the source, including clean-up solvent, shall not exceed 20 tons/year.

- b. 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.

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