

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Blachford, Inc.  
Attn: Gail W. Yauch  
1400 Nuclear Drive  
West Chicago, Illinois 60185-1636

Application No.: 89070037                      I.D. No.: 043090ACA  
Applicant's Designation:                      Date Received: February 13, 2002  
Subject: Noise Control Products Manufacturing  
Date Issued: December 30, 2002                      Expiration Date: December 30, 2007  
Location: 1400 Nuclear Drive, West Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 4 storage silos, 10 storage tanks, 1 calendar line, 1 mold spray (Bskin), 2 air make-up units, 1 neoprene spray, 1 extruder and 3 blowers with bag filters and dust collector, 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 volatile organic material (VOM) and hazardous air pollutants (HAPs) from the source to less than major source thresholds (i.e., VOM to less than 25 tons per year, and HAPs to less than 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs). As a result, the source is excluded from 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.
- 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. Total combined emissions and material usage from all facility operations (including any VOM and HAP emissions associated with clean-up operations) shall not exceed the following limits:

i.	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>
	4,123	24.74	4,123	24.74
ii.	<u>Combined HAP Usage</u>		<u>Combined HAP Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>
	4,123	24.74	4,123	24.74

iii.	<u>Single HAP<sup>1</sup> Usage</u>		<u>Single HAP<sup>1</sup> Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>
	1,600	9.60	1,600	9.60

<sup>1</sup> Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., vinyl chloride, xylenes, toluene (toluol), hexone (MIBK), ethyl benzene, etc.).

These emissions are based on maximum usage rates and 100% of the VOM and HAPs used being emitted.

- b. The emissions of 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 by rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit at time of issuance is based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 3a. Compliance with the annual limits for all operations shall be determined using a running total of 12 months of data.
- b. Compliance with the monthly and annual limits shall be determined on at least a monthly basis. These records shall be calculated and recorded before the 15th of the following month.
- c. Monthly emission calculations shall be made of the total emissions of VOM, total combined HAPs, and of single HAPs using the data specified in the recordkeeping requirements of this permit, e.g., usage, density, and weight percent VOM and HAP content.
- d. The monthly calculation of the emissions of VOM and HAPs shall be made using the VOM and HAP content as determined through the testing of the coating or solvent consistent with that specified in this permit.
- 4a. The Permittee shall maintain data on representative coatings and materials VOM and HAP contents, determined by laboratory analysis, such as the procedures of 35 Ill. Adm. Code Section 218.105.
- b. Within 30 days of a written request from the Illinois EPA, the Permittee shall submit data which includes the weight percent VOM and HAP content of the coatings and solvents, a justification of why these are representative, and a description of the sampling procedures and documentation for the analysis.
- 5a. The Permittee shall collect, calculate and record the following information on at least a monthly basis:

- i. A list giving the name and identification number of each coating, solvent, clean-up solvent, and any other material used containing VOM and/or HAP;
  - ii. VOM content in pounds VOM per gallon of coating as applied (minus water and any compounds which are specifically exempt from the definition of VOM) for each coating used;
  - iii. Actual usage rate of each material containing VOM and/or HAP, in gallons per month;
  - iv. The calculated monthly and annual usage, in pounds of VOM and pounds of each HAP; and
  - v. Emissions of VOM, total combined HAPs, and of single HAPs on a monthly and 12 month running total basis in pounds per month, and tons per year.
- b. All records and logs required by this permit shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry, and they 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 the normal office hours of the source, so as to be able to respond to an Illinois EPA or USEPA 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 Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the record keeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
7. 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

- 8. This permit is issued based upon negligible emissions of particulate matter from the 4 storage silos, the 3 blowers with bag filters and the dust collector. For this purpose, emissions from this emission unit shall not exceed the nominal emission rates of 0.1 pounds/hour and 0.44 tons/year.
- 9. Emissions and operations of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Operating Hours (Hours/Year)</u>	<u>Particulate Matter Emissions (Lb/Hour)</u>	<u>(Ton/Year)</u>
Neoprene Spray Booth	8,760	0.16	0.70
Calendar Line	6,120	0.60	2.63

These limits are based on the maximum operation of the equipment and standard emission factors. Compliance with the annual limits shall be based upon a running total of 12 months of data.

- 10a. Total combined emissions and natural gas usage from all fuel combustion emission units shall not exceed the following limits:

E M I S S I O N S				
<u>Natural Gas Usage (Million Btu/Yr)</u>	<u>Particulate Matter (Tons/Yr)</u>	<u>Nitrogen Oxides (Tons/Yr)</u>	<u>Volatile Organic Material (Tons/Year)</u>	<u>Carbon Monoxide (Tons/Year)</u>
60,500	0.3	3.1	0.2	2.5

These limits are based on standard emission factors (AP-42) and maximum operating rates. Compliance with the annual limits for the natural gas usage shall be determined using a running total of 12 months of data.

- b. Natural gas shall be the only fuel utilized at this source.
- c. Compliance with the annual fuel combustion and emission limits shall be determined from a rolling total of 12 months of data.
- 11a. The Permittee shall collect and record the following items for the fuel combustion emission units: natural gas usage (monthly and running 12 month total in million Btu burned).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry, and they shall be made available for inspection and copying by the Illinois EPA or the USEPA upon request.
- 12. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: VOM usage and emissions, and individual HAP usage and emissions, from the prior calendar year.

Page 5

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

DES:JPB:jar

cc: Illinois EPA, Field Operations Section, Region 1  
Illinois EPA, Compliance Section  
USEPA

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from this manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this permit and summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The maximum emissions are well below the levels at which the 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 since less materials are used than specified in this permit.

1. All Operations

a.	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>
	4,123	24.74	4,123	24.74
b.	<u>Combined HAP Usage</u>		<u>Combined HAP Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>
	4,123	24.74	4,123	24.74
c.	<u>Single HAP<sup>1</sup> Usage</u>		<u>Single HAP<sup>1</sup> Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Month)</u>	<u>(Tons/Yr)</u>
	1,600	9.60	1,600	9.60

<sup>1</sup> Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., vinyl chloride, xylenes, toluene (toluol), hexone (MIBK), ethyl benzene, etc.).

These emissions are based on maximum usage rates and 100% of the VOM and HAPs used being emitted.

2.	<u>Emission Units</u>	<u>Particulate Matter Emissions</u> <u>(Tons/Year)</u>
	4 Storage Silos	1.76
	Neoprene Spray Booth	0.70
	Calendar Line	2.63
	3 Blowers with Bag Filters	1.32
	Dust Collector	0.44

These emissions are based on nominal negligible emission rates at maximum operation of the emission units.

3.	<u>Natural Gas Usage</u>	<u>Particulate Matter</u>	<u>Nitrogen Oxides</u>	<u>E M I S S I O N S</u> <u>Organic Material</u>	<u>Carbon Monoxide</u>
	<u>(Million Btu/Yr)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Year)</u>	<u>(Tons/Year)</u>
	60,500	0.3	3.1	0.2	2.5

These emissions are based on the total combined maximum fuel usage and standard emission factors.

4. The emissions of 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 by rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit at its time of issuance 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.
5. The emissions of this attachment define the potential emissions of the source.

JPB:jar