

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Symons Corporation
Attn: Joe Brookes
200 East Touhy Avenue
Des Plaines, Illinois 60017-5018

Application No.: 97120062 I.D. No.: 031063AAH
Applicant's Designation: Date Received: December 18, 1997
Subject: Forms for Pouring Concrete
Date Issued: February 25, 2000 Expiration Date: February 25, 2005
Location: 200 East Touhy Avenue, Des Plaines

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of a paint spray booth, and a dip tank 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 per year of volatile organic material (VOM), 25 tons per year of combined hazardous air pollutants (HAP), and 10 tons per year of single 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.
2. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>VOM Usage and Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
A Spray Paint Booth	.51	5.1
A Dip Tank	1.5	14.5

These limits are based on maximum usage rate of coatings, maximum hours of operation, and average VOM contents. Compliance with annual limits shall be determined from a running total of 12 months of data.

- 3a. The VOM content as applied in the dip tank shall not exceed 3.5 lb/gal for extreme performance coatings that are air dried pursuant to 35 Ill. Adm. Code 215.104(J)(2)(A).
- b. This permit is issued based on the spray booth coating of plywood panels not being subject to Title 35, Part 218, Subpart FF: Coating Operations. Therefore, emissions of volatile organic material (VOM) from the spray booth shall not exceed 8 lb/hr pursuant to 35 Ill. Adm. Code 218.301.
4. This permit is issued based on no emissions of VOM and HAP from clean-up operations.
5. 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.
6. At all times the Permittee shall, to the extent practicable, maintain and operate the equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.
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 material or installation of controls, in order to eliminate the nuisance.
8. This permit is issued based on negligible emissions of particulate matter from the paint spray booth. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- 9a. The Permittee shall maintain records of the following items:
 - i. Usage of each coating and solvent (gal/month and gal/year);
 - ii. VOM and HAP content of each coating and solvent as applied (lb/gal or wt. %); and
 - iii. VOM, single HAP and total HAPs emissions (ton/month and ton/year).
- 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 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.

10. 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.
11. 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

12. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: usage of each coating and solvent; VOM and HAP content of each coating and solvent; VOM, single HAP and total HAPs emissions.

Please note that sawing, Bayco oven, and the parts washer are exempt from state permit requirements pursuant to 35 Ill. Adm. Code 201.146(aa), (fff), and (oo), respectively.

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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

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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 from manufacturing of concrete forms 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 using 26,344 gallons of paints and solvents. The resulting maximum emissions are well below the levels, e.g., 25 tons/yr of VOM, 25 tons/yr total HAPs, and 10 tons/yr for a single 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 handled and control measures are more effective than required in this permit.

- 1a. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>VOM Usage and Emissions</u>	
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A Dip Tank	1.5	14.5

- 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/yr of any single HAP or 25 tons/yr of any combination of such HAPs, or such lesser quantity as USEPA may establish in a 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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