

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Pro Tech Plastics, Inc.
Attn: Thomas Siwek
1295 West Helena Drive
West Chicago, Illinois 60185

Application No.: 02040023

I.D. No.: 043090ADG

Applicant' Designation:

Date Received: April 5, 2002

Subject: New Spray Coating Lines

Date Issued: April 16, 2007

Expiration Date: April 16, 2012

Location: 403 Charles Court, West Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two coating lines (consisting of three paint booths, two drying ovens, parts washer, and mixing room) and 18 plastic injection molding units controlled by the oxidizer 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:
- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) and hazardous air pollutants (HAPs) from the source to less than major source thresholds, i.e., VOM to less than 100 tons per year, and HAPs to less than 10 tons per year of any single HAP and 25 tons per year of any combination of such HAP). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
 - ii. To limit emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205, except reporting requirements of 35 Ill. Adm. Code 205.300.
 - iii. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture, 40 CFR 63 Subpart PPPP. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

- 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. Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.
- b. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.
- 3a. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 Ill. Adm. Code 212.122, pursuant to 35 Ill. Adm. Code 212.123(a), except as allowed by 35 Ill. Adm. Code 212.123(b) and 212.124.
- b. Pursuant to 35 Ill. Adm. Code 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 Ill. Adm. Code 212.321.
- 4a. Pursuant to 35 Ill. Adm. Code 218.182(a), no person shall operate a cold cleaning degreaser unless:
- i. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - ii. The cover of the degreaser is closed when parts are not being handled; and
 - iii. Parts are drained until dripping ceases.
- b. Pursuant to 35 Ill. Adm. Code 218.182(b), no person shall operate a cold cleaning degreaser unless:
 - i. The degreaser is equipped with a cover which is closed whenever parts are not being handled in the cleaner. The cover shall be

designed to be easily operated with one hand or with the mechanical assistance of springs, counter-weights or a powered system if:

- A. The solvent vapor pressure is greater than 2 kPa (15 mmHg or 0.3 psi) measured at 38°C (100°F);
 - B. The solvent is agitated; or
 - C. The solvent is heated above ambient room temperature.
- ii. The degreaser is equipped with a device for draining cleaned parts. The drainage device shall be constructed so that parts are enclosed under the cover while draining unless:
- A. The solvent vapor pressure is less than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F); or
 - B. An internal drainage device cannot be fitted into the cleaning system, in which case the drainage device may be external.
- iii. The degreaser is equipped with a freeboard height of 7/10 of the inside width of the tank or 91 cm (36 in), whichever is less, if the vapor pressure of the solvent is greater than 4.3 kPa (32 mmHg or 0.6 psi) measured at 38°C (100°F) or if the solvent is heated above 50°C (120°F) or its boiling point.
- iv. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser; and
- v. If a solvent spray is used, the degreaser is equipped with a solid fluid stream spray, rather than a fine, atomized or shower spray.
- c. Pursuant to 35 Ill. Adm. Code 218.182(c)(2)(B), on and after March 15, 2001, no person shall operate a cold cleaning degreaser with a solvent vapor pressure which exceeds 1.0 mmHg (0.019 psi) measured at 20°C (68°F), unless they are in compliance with the control requirements of 35 Ill. Adm. Code 218.182(c)(3).
- d. Pursuant to 35 Ill. Adm. Code 218.182(c)(3)(C) add-on controls operating at a source prior to the effective date of this rule shall be tested by March 1, 2006. Add-on controls constructed after the effective date of this rule shall be tested within 90 days of initial startup. Testing procedures and recording for add-on controls subject to 35 Ill. Adm. Code 218.182 (c)(3)(A) and (B) are to be performed pursuant to 35 Ill. Adm. Code 218.105(c), (d), (e), and (f). This condition shall become effective when the referenced rule is adapted by the Illinois Pollution Control Board.

- 5a. Pursuant to 35 Ill. Adm. Code 218.204(n), no owner or operator of a coating line shall apply at any time any coating in which the volatile organic material(VOM) content exceeds the specific emission limitations for the specified coating. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds, which are specifically, exempted form the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with this Subpart must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c). The emission limitations are as follows:

<u>Plastic Parts Coating (Automotive/Transportation)</u>	<u>Kg/liter</u>	<u>Lbs/gallons</u>
Baked		
Color Coat	0.49	4.1
Primer	0.46	3.8
Specialty		
Glass Reducers, Vacuum Metallizing Topcoats, and Texture Topcoats	<u>0.77</u>	<u>6.4</u>

- b. Pursuant to 35 Ill. Adm. Code 218.207(a), any owner or operator of a coating line subject to 35 Ill. Adm. Code 218.204 may comply with this Section, rather than with 35 Ill. Adm. Code 218.204, if a capture system and control device are operated at all times the coating line is in operation and the owner or operator demonstrates compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), or (k) of (depending upon the source category) through the applicable coating analysis and capture system and control device efficiency test methods and procedures specified in 35 Ill. Adm. Code 218.105 and the recordkeeping and reporting requirements specified in Section 218.211(e) of this Subpart; and the control device is equipped with the applicable monitoring equipment specified in 35 Ill. Adm. Code 218.105(d) and the monitoring equipment is installed, calibrated, operated and maintained according to vendor specifications at all times the control device is in use. A capture system and control device, which does not demonstrate compliance with 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g), (h), (i), (j), or (k) may be used as an alternative to compliance with 35 Ill. Adm. Code 218.204 only if the alternative is approved by the Illinois EPA and approved by the USEPA as a SIP revision.
- c. i. Pursuant to 35 Ill. Adm. Code 218.207(b)(1), the coating line is equipped with a capture system and control device that provides 81 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency; or

- ii. Pursuant to 35 Ill. Adm. Code 218.207(b)(2), the system used to control VOM from the coating line is demonstrated to have an overall efficiency sufficient to limit VOM emissions to no more than what is allowed under 35 Ill. Adm. Code 218.204.
- d. Pursuant to 35 Ill. Adm. Code 218.207(i), no owner or operator of a plastic parts coating line which applies one or more coatings during the same day, all of which are subject to the same numerical emission limitation within 35 Ill. Adm. Code 218.204(n) or (o) (e.g., all coatings used on the line are subject to 0.42 kg/liter [3.5 lbs/gallons]), and which is equipped with a capture system and control device shall operate the subject coating line unless the requirements in 35 Ill. Adm. Code 218.207(b)(1) or (b)(2) are met.
- e. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.
- 6a. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G: Use of Organic Material, shall apply only to photochemically reactive material.
- b. 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.
- 7a. The thermal oxidizer shall be in operation at all times when the associated emission unit(s) is in operation and emitting air contaminants, except for a period of not more than 30 days per each calendar year allowed for shutdown of the thermal oxidizer during malfunctions and maintenance.
- b. The thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation.
- 8a. Emissions and operation of coating operations with thermal oxidizer in operation shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lbs/Month)</u>	<u>(Lbs/Year)</u>	<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>
Coating	8,600	69,480	1,634	6.60
Thinner	5,800	46,210	1,102	4.39
Clean-Up and Parts				
Washer Solvent	3,250	25,900	618	<u>2.46</u>
				13.45

These limits are based on the thermal oxidizer and associated capture system achieving a minimum overall reduction of 81% of uncontrolled VOM emissions, complete volatilization of the VOM content of the material, and material VOM usage = material VOM content x material usage.

- b. Emissions and operation of coating operations with thermal oxidizer shutdown during the periods provided by Condition 7(a) shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lbs/Month)</u>	<u>(Lbs/Year)</u>	<u>(Lbs/Month)</u>	<u>(Tons/Year)</u>
Coating	6,220	6,220	6,220	3.11
Thinner	4,140	4,140	4,140	2.07
Clean-Up and Parts				
Washer Solvent	2,320	2,320	2,320	<u>1.16</u>
				6.34

These limits are based on complete volatilization of the VOM content of the material, material VOM usage = material VOM content x material usage, and a maximum of 30 days of operating of the coating operations without the thermal oxidizer per calendar year.

- c. The above limitations were established in Permit 02040024, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.
- 9a. Total amount of coating usage in the spray coating lines shall not exceed 12.13 tons/month and 72.8 tons/year.
- b. Total VOM emissions from the spray coating lines shall not exceed 6.34 tons/month and 9.88 tons/year.
- c. This permit is issued based on negligible of emissions nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), sulfur dioxide (SO₂), and VOM from the combustion of natural gas in the drying ovens. For this purpose emissions of each pollutant shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
- d. The above limitations were established in Permit 05070002, pursuant to 35 Ill. Adm. Code Part 203. These limits ensure that the construction

and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 35 Ill. Adm. Code Part 203.

10. This permit is issued based on negligible emissions of volatile organic material (VOM) from the plastic injection molding. For this purpose emissions from all such emission unit shall not exceed 0.1 lbs/hour and 0.44 tons/year.
11. 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 (CAAPP) Permit.
12. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
13. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
- 14a. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If

relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- b. The Permittee shall maintain the following records to determine compliance with the 15 tons VOM/ozone season limitation specified in Condition 2:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- c. Pursuant to 35 Ill. Adm. Code 218.182(d)(3), on and after March 15, 1999, all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c)(3) must maintain records which include for each purchase:
 - i. The name and address of the solvent supplier;
 - ii. The date of purchase;
 - iii. The type of solvent;
 - iv. The total volume of solvent; and
 - v. The vapor pressure of the solvent measured in mmHg at 20°C (68°F).
- d. Pursuant to 35 Ill. Adm. Code 218.182(d)(3) on and after March 15, 1999, all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c)(3) shall maintain records documenting the use of good operating practices consistent with the equipment manufacturer's specifications for the cold cleaning degreasers and add-on control equipment. At a minimum these records shall include:
 - i. Records of periodic inspection of the cold cleaning degreasers and add-on control equipment with date, individual performing the inspection, and nature of inspection;

- ii. Records for repair of malfunctions and breakdowns with identification and description of incident, date identified, date repaired nature of repair, and the amount of VOM that escaped into the atmosphere as a result of the incident;
 - iii. Control device monitoring and recording data; and
 - iv. A log of operating time for the control device, monitoring equipment, and all associated degreasers.
- e. Pursuant to 35 Ill. Adm. Code 218.182(c) on and after March 15, 1999, all persons subject to the requirements of 35 Ill. Adm. Code 218.182(c)(3) shall notify the Agency at least 30 days before changing the method of compliance. Such notification shall include a demonstration of compliance with the newly applicable method of compliance.
- f. Conditions 14d. and 14e. of this permit shall become effective when the referenced rules are adapted by the Illinois Pollution Control Board.
- g. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 of and complying by means of 35 Ill. Adm. Code 218.204 shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
- i. The name and identification number of each coating as applied on each coating line; and
 - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.
- h. Pursuant to 35 Ill. Adm. Code 218.211(e)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g) or (h) shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:
- i. The weight of VOM per volume of coating solids as applied each day on each coating line, if complying pursuant to 35 Ill. Adm. Code 218.207(b)(2).
 - ii. Control device monitoring data.
 - iii. A log of operating time for the capture system, control device, monitoring equipment and the associated coating line.
 - iv. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non routine

maintenance performed including dates and duration of any outages.

- i. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Name, usage (gallons/month and gallons/year), VOM and HAP content (lbs/gallon or % weight), VOM and HAP emissions with the thermal oxidizer operating properly for the following materials:
 - A. Coatings;
 - B. Thinners; and
 - C. Clean-up solvents.
 - ii. Name and VOM and HAPs content of all coatings as applied in lbs/gallon (minus water and other exempted compounds) for each coating line each day.
 - iii. Records addressing use of good operating practices of the thermal oxidizer including:
 - A. Records of periodic inspection of the thermal oxidizer along with the date of inspection, individual performing the inspection and nature of inspection; and
 - B. Records detailing the deficiencies that occur including description, duration, effect on emissions, date repaired and repair description of the deficiencies.
 - iv. The Permittee shall maintain records of the VOM emissions of the coating lines during periods of malfunction and/or maintenance of the thermal oxidizer. At a minimum these records shall contain the following:
 - A. Dates and duration of each period of malfunction and/or maintenance;
 - B. A full and detailed description of the cause for each period of malfunction and/or maintenance;
 - C. Detailed emissions of VOM and HAP emissions during each period of malfunction and/or maintenance; and
 - D. Steps taken to prevent similar malfunctions periods and/or reduce the frequency of the maintenance periods of shutdown of the thermal oxidizer during normal operations.
 - v. Monthly and aggregate annual CO, NO_x, PM, SO₂, VOM and HAP emissions from the source with supporting calculations (tons/month and tons/year).

15. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) 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.
- 16a. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(b) and 35 Ill. Adm. Code 205.300.
 - b. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 of and complying by means of 35 Ill. Adm. Code 218.204 shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(d)(1) or (e)(1), respectively. Upon changing the method of compliance from 35 Ill. Adm. Code 218.204 to 35 Ill. Adm. Code 218.205 or 35 Ill. Adm. Code 218.207, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(d) or (e), respectively.
 - b. Pursuant to 35 Ill. Adm. Code 218.211(e)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.207 and complying by means of 35 Ill. Adm. Code 218.207(c), (d), (e), (f), (g) or (h) shall notify the Illinois EPA in the following instances:
 - i. Any record showing violation of 35 Ill. Adm. Code 218.207 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation.
 - ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall comply with all requirements of 35 Ill. Adm. Code 218.207(c)(1) or (d)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart F from 35 Ill. Adm. Code 218.207 to 35 Ill. Adm. Code 218.204 or 35 Ill. Adm. Code 218.205, the owner or operator shall

comply with all requirements of 35 Ill. Adm. Code 218.207(c) or (d), respectively.

17. If there is an exceedance of or deviation from 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/deviation. 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 deviation and efforts to reduce emissions and future occurrences.
18. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

Telephone: 217/782-5811

Facsimile: 217/524-4710

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

Telephone: 847/294-4000

Facsimile: 847/294-4018

If you have any questions on this, please call George Kennedy at 217/782-2113.

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

DES:GMK:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from this facility 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 below the levels, (e.g., 100 tons/year of VOM and 10 tons per year of any single HAP and 25 tons per year of any combination of such 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.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)					Single	Total
	<u>CO</u>	<u>NO_x</u>	<u>PM</u>	<u>SO₂</u>	<u>VOM</u>	<u>HAP</u>	<u>HAPs</u>
Coating Operations w/Thermal Oxidizer in Operation					13.45		
Coating Operations w/o Thermal Oxidizer					6.34		
Spray Coating Lines					9.88		
Plastic Injection Molding					0.44		
Fuel Combustion	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>		
Totals	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>	<u>0.44</u>	<u>30.55</u>	<u>< 10</u>	<u>< 25</u>

GMK:psj

Attachment B - Emissions Reduction Market System (ERMS)

1. Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' FESOP or CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 Ill. Adm. Code 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 Ill. Adm. Code 205.500 and 35 Ill. Adm. Code 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 Ill. Adm. Code 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 Ill. Adm. Code 205.630).

2. Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities. This limitation is established at the request of the source to exempt it from the requirements of 35 Ill. Adm. Code Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 Ill. Adm. Code 205.205.

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3. Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine compliance with the above limitation:

- i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures, which may be specified in this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 Ill. Adm. Code 205.205(b) and 35 Ill. Adm. Code 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

GMK:psj