

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- RENEWAL

Permittee

L.D. Redmer Screw Products, Inc.  
Attn: Chuck Patterson  
515 Thomas Drive  
Bensenville, Illinois 60106

Application No.: 74110001                      I.D. No.: 043414AAM  
Applicant's Designation:                      Date Received: April 14, 2005  
Subject: Open Top Vapor Degreaser & Cold Degreaser  
Date Issued: September 22, 2006              Expiration Date: September 22, 2011  
Location: 515 Thomas Drive, Bensenville

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of an open top vapor degreaser and a cold cleaning degreaser as described in 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., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from 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 the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. 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 the current permit(s) issued for this location.
- 2a. The open top vapor degreaser is subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR 63 Subpart T. The Illinois EPA is administering the NESHAP in Illinois on behalf of the United States EPA under a delegation agreement. The United States EPA issued this final rule on December 2, 1994.

- b. Pursuant to 40 CFR 63.463(a), except as provided in 40 CFR 63.464 for all cleaning machines, each owner or operator of a solvent cleaning machine subject to the provisions of 40 CFR 63 Subpart T shall ensure that each existing or new batch vapor or in-line solvent cleaning machine subject to the provisions of this subpart conforms to the design requirements specified in 40 CFR 63.463(a) (1) through (7).
  - i. Each cleaning machine shall be designed or operated to meet the control equipment or technique requirements in 40 CFR 63.463(a) (1) (i) or (a) (1) (ii).
    - A. An idling and downtime mode cover, as described in 40 CFR 63.463(d) (1) (i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
    - B. A reduced room draft as described in 40 CFR 63.463(e) (2) (ii).
  - ii. Each cleaning machine shall have a freeboard ratio of 0.75 or greater.
  - iii. Each cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - iv. Each vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils. This requirement does not apply to a vapor cleaning machine that uses steam to heat the solvent.
  - v. Each vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
  - vi. Each vapor cleaning machine shall have a primary condenser.
  - vii. Each cleaning machine that uses a lip exhaust shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of 40 CFR 63.463(e) (2) (vii).
- c. Pursuant to 40 CFR 63.463(b) (1) (i), except as provided in 40 CFR 63.464, each owner or operator of an existing or new batch vapor cleaning machine with a solvent/air interface area of 1.21 square meters (13 square feet) or less shall employ the control combination of reduced room draft, dwell, and freeboard ratio of 1.0 (Option 8 listed in table 1 of 40 CFR 63 Subpart T) or other equivalent methods of control as determined using the procedure in §63.469, equivalent methods of control.

- d. Pursuant to 40 CFR 63.463(d), except as provided in 40 CFR 63.464 for all cleaning machines, each owner or operator of an existing or new batch vapor or in-line solvent cleaning machine shall meet all of the following required work and operational practices specified in 40 CFR 63.463(d) (1) through (12) as applicable. The owner or operator of a continuous web cleaning machine shall comply with the requirements of 40 CFR 63.463(g) or (h), as appropriate, in lieu of complying with this paragraph.
  - i. Control air disturbances across the cleaning machine opening(s) by incorporating the control equipment or techniques in 40 CFR 63.463(d) (1) (i) or (d) (1) (ii).
    - A. Cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
    - B. A reduced room draft as described in 40 CFR 63.463(e) (2) (ii).
  - ii. The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
  - iii. Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).
  - iv. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Illinois EPA or USEPA.
  - v. Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
  - vi. During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
  - vii. During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
  - viii. When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

- ix. Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Illinois EPA's or the USEPA's satisfaction to achieve the same or better results as those recommended by the manufacturer.
  - x. Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning procedures in appendix A to 40 CFR part 63 if requested during an inspection by the Illinois EPA or USEPA.
  - xi. Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
  - xii. Sponges, fabric, wood, and paper products shall not be cleaned.
- 3a. 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).
- 4a. Pursuant to 35 Ill. Adm. Code 218.183(a), no person shall operate an open top vapor degreaser unless:
  - i. The cover of the degreaser is closed when workloads are not being processed through the degreaser;
  - ii. Solvent carry out emissions are minimized by:
    - A. Racking parts to allow complete drainage;
    - B. Moving parts in and out of the degreaser at less than 3.3 m/min (11 ft/min);
    - C. Holding the parts in the vapor zone until condensation ceases;
    - D. Tipping out any pools of solvent on the cleaned parts before removal from the vapor zone; and
    - E. Allowing parts to dry within the degreaser until visually dry;
  - iii. Porous or absorbent materials, such as cloth, leather, wood or rope, are not degreased;
  - iv. Less than half of the degreaser's open top area is occupied with a workload;
  - v. The degreaser is not loaded to the point where the vapor level would drop more than 10 cm (4 in) when the workload is removed from the vapor zone;

- vi. Spraying is done below the vapor level only;
  - vii. Solvent leaks are repaired immediately;
  - viii. 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;
  - ix. Water is not visually detectable in solvent exiting from the water separator; and
  - x. Exhaust ventilation exceeding 20 cubic meters per minute per square meter (65 cubic feet per minute per square foot) of degreaser open area is not used, unless necessary to meet the requirements of the Occupational Safety and Health Act (29 U.S.C. Section 651 et seq.).
- b. Pursuant to 35 Ill. Adm. Code 218.183(b), no person shall operate an open top vapor degreaser unless:
- i. The degreaser is equipped with a cover designed to open and close easily without disturbing the vapor zone;
  - ii. The degreaser is equipped with the following switches:
    - A. One which shuts off the sump heat if the amount of condenser coolant is not sufficient to maintain the designed vapor level; and
    - B. One which shuts off the spray pump if the vapor level drops more than 10 cm (4 in) below the bottom condenser coil; and
    - C. One which shuts off the sump heat source when the vapor level exceeds the design level;
  - iii. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser;
  - iv. The degreaser is equipped with a freeboard height of 3/4 of the inside width of the degreaser tank or 91 cm (36 in), whichever is less; and if the degreaser opening is greater than 1 square meter (10.8 square feet), a powered or mechanically assisted cover.
- 5a. Emissions and solvent usage of the open top vapor degreaser shall not exceed the following limits:

| Solvent Usage <sup>1</sup> |                   | HAP and VOM Emissions <sup>2</sup> |                    |
|----------------------------|-------------------|------------------------------------|--------------------|
| <u>(Lbs/Month)</u>         | <u>(Lbs/Year)</u> | <u>(Lbs/Month)</u>                 | <u>(Tons/Year)</u> |
| 1,500                      | 18,000            | 1,500                              | 9.0                |

<sup>1</sup> Solvent usage is defined as solvent that is added to the vapor degreaser minus the solvent component of the waste recovered from

the degreaser. Trichloroethylene is used as the solvent for the degreaser.

<sup>2</sup> HAPs as identified in Section 112(b) of the Clean Air Act as amended in 1990. Trichloroethylene is listed as a HAP.

These limits define the potential emissions of HAPs for the source and are based on the maximum usage.

- b. i. Emissions and solvent usage of the cold cleaning degreaser shall not exceed the following limits:

| Solvent Usage <sup>1</sup> |                   | VOM Emissions      |                    |
|----------------------------|-------------------|--------------------|--------------------|
| <u>(Lbs/Month)</u>         | <u>(Lbs/Year)</u> | <u>(Lbs/Month)</u> | <u>(Tons/Year)</u> |
| 1,387                      | 16,644            | 1,387              | 8.32               |

<sup>1</sup> Solvent usage is defined as solvent that is added to the vapor degreaser minus the solvent component of the waste recovered from the degreaser.

- ii. These limits define the potential emissions of the cold cleaning degreaser and are based on the maximum solvent usage.
- iii. This permit is issued based on the use of cleaning solvent in the cold cleaning degreasing containing no HAP materials.
- c. 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.
- d. Compliance with annual limits on the degreaser 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).
- e. Compliance with the VOM and HAP emission limits shall be calculated using the amount of solvent added to the machine (lb/mo) minus the amount of solvent recovered from the degreaser sludge as follows:

$$\text{Emissions (Lbs/Month)} = \frac{\text{Solvent Added (Lbs/Month)}}{\text{Solvent Recovered (Lbs/Month)}}$$

- 6a. Pursuant to 40 CFR 63.463(e), each owner or operator of a solvent cleaning machine complying with 40 CFR 63.463(b), (c), (g), or (h) shall comply with the requirements specified in 40 CFR 63.463(e) (1) through (4).
  - i. Conduct monitoring of each control device used to comply with 40 CFR 63.463 as provided in 40 CFR 63.466.

- ii. Determine during each monitoring period whether each control device used to comply with these standards meets the requirements specified in 40 CFR 63.463(e) (2) (i) through (xi).
  - A. If a reduced room draft is used to comply with these standards, the owner or operator shall comply with the requirements specified in 40 CFR 63.463(e) (2) (ii) (A) and (e) (2) (ii) (B).
    - I. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in 40 CFR 63.466(d).
    - II. Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466(d).
  - B. If a dwell is used to comply with these standards, the owner or operator shall comply with the requirements specified in 40 CFR 63.463(e) (2) (v) (A) and (e) (2) (v) (B).
    - I. Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described in 40 CFR 63.465(d).
    - II. Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.
- iii. If any of the requirements of 40 CFR 63.463(e) (2) are not met, determine whether an exceedance has occurred using the criteria in 40 CFR 63.463(e) (3) (i) and (e) (3) (ii).
  - A. An exceedance has occurred if the requirements of paragraphs 40 CFR 63.463(e) (2) (ii) (B) or (e) (2) (v) have not been met.
  - B. An exceedance has occurred if the requirements of 40 CFR 63.463(e) (2) (ii) (A) have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

- iv. The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468(h).
- b. Pursuant to 40 CFR 63.466(b)(2), except as provided in 40 CFR 63.466(g), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the equipment standards in 40 CFR 63.463(b)(1)(i), (b)(2)(i), (c)(1)(i), or (c)(2)(i) shall conduct monitoring and record the results on a monthly basis for the control devices. If a dwell is used, the owner or operator shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.
- c. Pursuant to 40 CFR 63.466(d), except as provided in 40 CFR 63.466(g), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the equipment standards in 40 CFR 63.463(b)(1)(i), (b)(2)(i), (c)(1)(i), or (c)(2)(i) using a reduced room draft shall conduct monitoring and record the results as specified in 40 CFR 63.466(d)(1) or (d)(2).
  - i. If the reduced room draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), the owner or operator shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters as specified in 40 CFR 63.466(d)(1)(i) and (d)(1)(ii).
    - A. Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the procedure specified in 40 CFR 63.466(d)(1)(i)(A) through (d)(1)(i)(D).
      - I. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
      - II. Orient a velometer in the direction of the wind current at each of the four corners of the machine.
      - III. Record the reading for each corner.
      - IV. Average the values obtained at each corner and record the average wind speed.
    - B. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
  - ii. If an enclosure (full or partial) is used to achieve a reduced room draft, the owner or operator shall conduct an initial monitoring test and, thereafter, monthly monitoring tests of the windspeed within the enclosure using the procedure specified in 40 CFR 63.466(d)(2)(i) and (d)(2)(ii) and a monthly visual

inspection of the enclosure to determine if it is free of cracks, holes and other defects.

- A. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.
- B. Record the maximum wind speed.

7a. Pursuant to 40 CFR 63.467(a), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of 40 CFR 63.463 shall maintain records in written or electronic form specified in CFR 63.467(a) (1) through (7) for the lifetime of the machine.

- i. Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
- ii. The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
- iii. If a dwell is used to comply with these standards, records of the tests required in 40 CFR 63.465(d) to determine an appropriate dwell time for each part or parts basket.
- iv. Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of 40 CFR 63 Subpart T.

b. Pursuant to 40 CFR 63.467(b), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with 40 CFR 63.463 shall maintain records specified in 40 CFR 63.467(b) (1) through (b) (4) either in electronic or written form for a period of 5 years.

- i. The results of control device monitoring required under 40 CFR 63.466.
- ii. Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- iii. Estimates of annual solvent consumption for each solvent cleaning machine.

c. Pursuant to 35 Ill. Adm. Code 218.182(d) (2), on and after March 15, 1999, all persons subject to the requirements of 35 Ill. Adm. Code

218.182(c)(1)(B) and (c)(2)(B) 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; and
  - iv. The vapor pressure of the solvent measured in mmHg at 20°C (68°F).
- d. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
- i. Amount of each solvent added to each degreaser (lb/month and tons/year);
  - ii. Amount of each solvent recovered from each degreaser sludge (lb/month and tons/year); and
  - iii. Monthly and annual emissions of HAPs and VOM with supporting calculations (tons/month and tons/year).
- e. 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.
- 8a. Pursuant to 40 CFR 63.468(f), each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of 40 CFR 63.463 shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified in 40 CFR 63.468(f)(1) through (f)(3).
- i. A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463(d)(10)."
  - ii. An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
  - iii. The reports required under 40 CFR 63.468(f) and (g) can be combined into a single report for each facility.
- b. Pursuant to 40 CFR 63.468(h), each owner or operator of a batch vapor or in-line solvent cleaning machine shall submit an exceedance report

to the Illinois EPA or USEPA semiannually except when, the Illinois EPA or USEPA determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under 40 CFR 63.468(i) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in 40 CFR 63.468(h) (1) through (3).

- i. Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
    - ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
    - iii. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
  - c. Pursuant to 40 CFR 63.468(i), an owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in 40 CFR 63.468(i) (1) through (i) (3) are met.
    - i. The source has demonstrated a full year of compliance without an exceedance.
    - ii. The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified 40 CFR 63 Subpart A (General Provisions) and in 40 CFR 63 Subpart T.
    - iii. The Illinois EPA or USEPA does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e) (3) (iii) of 40 CFR 63 Subpart A (General Provisions).
  - d. If there is an exceedance of or deviation from the requirements of or a deviation from 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 exceedances or deviation and efforts to reduce emissions and future occurrences.
9. 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

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

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

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:DWH:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from operating degreasers 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 per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled 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 used and control measures are more effective than required in this permit.

| <u>Emission Units</u>   | <u>Emissions (Tons/Year)</u> |                   |                   |
|-------------------------|------------------------------|-------------------|-------------------|
|                         | <u>VOM</u>                   | <u>Single HAP</u> | <u>Total HAPs</u> |
| Vapor Degreaser         | 9.00                         | 9.00              | 9.00              |
| Cold Cleaning Degreaser | <u>8.32</u>                  | <u>----</u>       | <u>----</u>       |
| Totals                  | 17.32                        | < 10              | < 25              |

DES:DWH:psj