

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Schutt Sports Manufacturing Company  
Attn: Peter Donahoe  
2510 South Broadway  
Salem, Illinois 62881

Application No.: 06050017

I.D. No.: 121045ABL

Applicant's Designation:

Date Received: May 1, 2006

Subject: Gluing, Painting

Date Issued: [DRAFT]

Expiration Date: (Five Years)

Location: 2510 South Broadway, Salem, Marion County

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of four paint booths, and a gluing operation 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., 100 tons/year for VOM, 10 tons/year for a single HAP and 25 tons/year for combined HAPs). 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.
  - ii. 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 Plastic Parts and Products, 40 CFR 63 Subpart PPPP. This is consequence of the federally enforceable production and operating limitations, which restrict the 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, being established prior to the Compliance Date for existing sources listed in 40 CFR 63.3883(b).
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
- 2a. 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.

- 3a. VOM usage and emissions from the coating operations shall not exceed 2.10 tons/month and 24.50 tons/year and HAP emissions shall not exceed 0.9 tons/month and 9.0 tons/year for a single HAP or 2.25 tons/month and 22.5 tons/year for any combination of HAPs
- b. VOM usage and emissions from the gluing operations shall not exceed 0.45 tons/month and 4.50 tons/year.
- c. The emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single hazardous air pollutant or 25 tons per year of any combination of such hazardous air pollutants, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any hazardous air pollutants from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- d. The VOM/HAP emissions shall be determined from the following equation:

$$E = \Sigma(M_i \times V_i) / 2,000 - \Sigma(W_j \times V_j)$$

where;

E - VOM/HAP emissions (tons);

M<sub>i</sub> - VOM/HAP-containing material usage (gallons);

V<sub>i</sub> - VOM/HAP content of material (lbs/gallon);

W<sub>j</sub> - certified amount of waste shipped-off (tons);

V<sub>j</sub> - certified VOM/HAP content of the waste (fraction).

These limits are based on the maximum production rate and material balance calculations. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (12 month total).

- 4. This permit is issued based on negligible particulate matter (PM) emission from paint booth. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lbs/hour and 0.44 tons/year.
- 5a. 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 records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. The name and identification number of each coating as applied each day;
  - ii. The weight of VOM per volume of each coating (minus water and exempt compounds which are specifically exempted from the definition of VOM) as applied;
  - iii. Coating and solvent usage (gallons/month, gallons/year);
  - iv. Coating and solvent VOM and HAP content (lbs/gallon); and
  - v. Monthly and annual PM, VOM, and HAP emissions with supporting calculations (tons/month and tons/year).
6. 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.
7. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Agency's Compliance and

Enforcement 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.

8. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance and Enforcement 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  
2009 Mall Street  
Collinsville, Illinois 62234

If you have any questions on this permit, please call German Barria at 217/782-2113.

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

ECB:GB:psj

cc: IEPA, FOS Region 3  
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the Air Conditioner Compressor Manufacturing Plant, 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 (i.e., 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined 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 material is handled, coatings used and control measures are more effective than in this permit.

| <u>Emission Units</u> | E M I S S I O N S (Tons/Year) |            |                   |                   |
|-----------------------|-------------------------------|------------|-------------------|-------------------|
|                       | <u>VOM</u>                    | <u>PM</u>  | <u>Single HAP</u> | <u>Total HAPs</u> |
| Four Paint Booths     | 20.5                          | 0.4        | 9.0               | 22.5              |
| One Gluing Operation  | <u>4.5</u>                    |            |                   |                   |
| Plant-Wide Totals     | 25.0                          | <u>0.4</u> | <u>&lt; 10</u>    | <u>&lt; 25</u>    |

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