

217/782-2113

"RENEWAL"  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Switzer Products L.L.C.  
Attn: Mr. Dilip Chudasama  
5700 Walnut  
Richmond, Illinois 60071

<u>Application No.:</u> 94080144	<u>I.D. No.:</u> 111075AAJ
<u>Applicant's Designation:</u> SPRAY GUNS	<u>Date Received:</u> June 14, 2000
<u>Subject:</u> Fiberglass Laminating	
<u>Date Issued:</u> November 13, 2000	<u>Expiration Date:</u> November 13, 2005
<u>Location:</u> 5700 Walnut, Richmond	

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of one fiberglass laminating operation with 6 spray/chop guns 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 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 further described in Attachment A. As a result, the source is excluded from requirements to obtain a Clean Air Act Program permit.
  - 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.
2. Operation of the fiberglass laminating operation shall not exceed the following limits:
- a. Resin and gel coat usage for the fiberglass laminating operation:
    - i. Resin: 20,000 lb/month and 240,000 lb/year.
    - ii. Gel Coat: 6,250 lb/month and 75,000 lb/year.
  - b. VOM (Styrene) content:
    - i. Resin: 42.5% weight basis.

ii. Gel Coat: 37% weight basis.

c. This permit is issued based on negligible emissions of particulate matter from fiberglass laminating operation. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hr and 0.44 ton/yr.

- d. This permit is issued based on no emissions from clean-up operations.
  - e. These limits define the potential emission of volatile organic material and are based on the actual emission determined from maximum production capacity, standard emission factors and percentage of VOM (styrene weight basis) in resin and gel coat.
  - f. 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.
3. 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 Permit (CAAPP), and Section 112(G) of the Clean Air Act.

- a. Emissions of hazardous air pollutants (HAPs), as specified in Appendix A of the Clean Air Act, shall not exceed the following limits:

<u>Item</u>	<u>HAPs Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Individual HAP	0.82	9.84
All HAPs	0.82	9.84

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

- b. These limits define the potential emissions of HAPs and are based on the actual emissions determined from maximum production capacity, standard emission factors, and percentage of HAPs (styrene weight basis) in resin and gel coat.
  - c. 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.
4. The fiberglass laminating operation is subject to 35 Ill. Adm. Code 218, Subpart CC and shall comply with the control requirements of 35 Ill. Adm. Code 218.666.
- 5a. The Permittee shall maintain records of the following items:
- i. Name and identification number and weight percentage of VOM (styrene) for each resin and gel coat.

- ii. Usage of each resin and gel coat on a monthly basis and 12 months rolling total basis.
- iii. Usage of cleanup solvent on a monthly basis and 12 months rolling total basis.

- iv. Emissions of VOM on a monthly and 12 months rolling total basis.
  - v. Emissions of individual HAP and total HAPs on a monthly and 12 months rolling total basis.
- 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 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 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 record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Unit 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.
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  
Eisenhower Tower  
1701 South First Avenue  
Maywood, Illinois 60153

8. The Permittee shall submit the following additional information from the prior calendar year along with the Annual Emission Report, due May 1st of each year:
- a. Name and identification number and weight percentage of VOM (styrene) for each resin and gel coat.

- b. Usage of each resin and gel coat on a monthly basis and 12 months rolling total basis.
- c. Usage of cleanup solvent on a monthly basis and 12 months rolling total basis.

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- d. Emissions of VOM on a monthly and 12 months rolling total basis.
- e. Emissions of individual HAP and total HAPs on a monthly and 12 month rolling total basis.

Please note that acetone is no longer considered a pollutant and has been removed from this permit.

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: IEPA, FOS Region 1

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from fiberglass laminating 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. This is handling 120 tpy of resin and 37.5 tpy of gel coat. The resulting maximum emissions are well below the levels, e.g., 25 tpy of VOM, 25 tpy of combined HAPs, and 10 tpy of each 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. Emission of volatile organic material (VOM) from the fiberglass laminating operation.

	Material		Emission Factor (Weight % Emitted)	VOM Emissions	
	Usage (T/Yr)	Styrene Content (Weight %)		(T/Mo)	(T/Yr)
Resin	120.00	42.5	11	0.47	5.61
Gel Coat	37.50	37.0	30.5	0.35	4.23
				Total	9.9

This table defines the potential emissions from the fiberglass laminating operation. The emission limits are based on a maximum VOM (styrene) percentage (weight basis) in resin and gel coat, and standard emission factor.

- b. Emission of hazardous air pollutants (HAPs), as specified in Appendix A of the Clean Air Act, shall not exceed the following limits:

Item	HAPs Emissions	
	(Tons/Month)	(Tons/Year)
Individual HAP	0.82	9.84
All HAPs	0.82	9.84

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