

**UNITED PLASTICS GROUP, INC.
BENSENVILLE, ILLINOIS
PROJECT SUMMARY**

I. INTRODUCTION

United Plastics Group, Inc. (UPG) has requested a permit to correct past noncompliance issues at its plastic parts manufacturing facility in Bensenville. The result will be to decrease actual emissions of volatile organic material (VOM) at the source.

II. PROJECT DESCRIPTION

UPG manufactures plastic parts used in cellular telephones and hand-held walkie-talkies. UPG molds the plastic parts onsite by the injection molding process in the Foster Avenue building and the parts are then shield coated in the Thomas Drive building. Shield coating is performed on the plastic parts to prevent EMI/RFI signals from interrupting the performance of other electronic components. The Federal Communication Commission (FCC) regulates EMI/RFI emissions, which results in the use of shielding material.

The two major performance specifications for EMI/RFI shielding materials are conductivity and adhesion, UPG uses an organic-solvent-based metal-filled coating material containing particles of nickel, silver and copper in either an acrylic or urethane resin. Typically these shielding materials are spray applied by air atomizing the spray coating with compressed air. The coating process involves surface preparation, coating application and curing. The transfer efficiency for EMI/RFI shield coating is about 50%.

After the shield-coated parts are dried, they are assembled and shipped off-site.

Emission Unit	Description	Emission Control Equipment
01	Spray Booth (Cell #13)	Water Wash Curtain
02	Spray Booth (Cell #14)	Water Wash Curtain
03	Spray Booth (Cell #16)	Water Wash Curtain

The pad and laser printing process is used to apply ink at specific locations on a paper substrate.

Emission Unit	Description	Emission Control Equipment
04	1 Pad Printing Line	None
05	1 Laser Printing Line	None

III. PROJECT EMISSIONS

The permitted VOM emissions of this plant, as established by this permit are 10 tons/year. As a result of an enforcement action, an agreement was reached that requires that the plant no longer be a major source and VOM emissions be less than half of the major source threshold.

IV. APPLICABLE REGULATIONS

The enforcement action taken against UPG was based on the source exceeding a 25 tpy New Source Review limit in 199__ (because they had constructed the source in 199__). The permit does not require use of the Lowest Achievable Emission Rate (LAER) or acquisition of offsets (as required under Part 203 of the 35 IAC) because both the amount and rate of VOM emissions are being very effectively minimized. The enforcement action has already addressed these deficiencies separately.

The coating and pad screening operations must meet the requirements of 35 IAC Part 218, Subparts F and TT, respectively. This permit relies upon the plant's coating lines complying with the VOM standard set in 35 IAC 218.204(o). The pad screening operations, having never exceeded 25 tpy, will be limited to below this value and not be required to comply with the VOM content limitations established in the subpart.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements for the coating and pad printing operations to minimize VOM emissions. The permit also establishes appropriate compliance procedures, including recordkeeping requirements and reporting requirements.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the proposed permit meets all applicable state and federal air pollution control requirements. The Illinois EPA is therefore proposing to issue a permit for construction of the proposed project.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.