

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Parker Hannifin Corp.
Attn: Dennis Wolcott
10625 Beaudin Boulevard
Cleveland, OH 44124

Application No.: 05120080

I.D. No.: 197425AAA

Applicant's Designation:

Date Received: December 4, 2006

Subject: Rubber Adhesive Bonding and Rubber Parts

Date Issued:

Expiration Date:

Location: 10625 Beaudin Boulevard, Woodridge, Will County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Twenty-Four (24) Small Rubber Molding Presses;
Forty-Four (44) Large Rubber Molding Presses;
Three (3) Gas Curing Ovens Controlled by an Electrostatic Precipitator;
Four (4) Gas Post Cure Ovens (Uncontrolled);
Four (4) Electric Post Cure Ovens (Uncontrolled);
Sleeve Making Operation;
Two (2) Adhesive Application Dip Tanks; and
Three (3) Abrasive Blaster (Parts Cleaning) Units

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 Volatile Organic Material (VOM) and 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements 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. 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.
 - iii. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes).

- 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) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
 - c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
 - d. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, 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 35 Ill. Adm. Code 212.321(c).
- 3a. Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012: except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;

- b. Pursuant to 35 Ill. Adm. Code 218.187(b), no owner or operator of a source subject to 35 Ill. Adm. Code 218.187, other than manufacturers of coatings, inks, adhesives, or resins, shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in 35 Ill. Adm. Code 218.187(b) (1), (b) (2), or (b) (3). No owner or operator of a source that manufactures coatings, inks, adhesives, or resins shall perform any cleaning operation subject to 35 Ill. Adm. Code 218.187 unless the owner or operator meets the requirements in at least one of the following subsections: 35 Ill. Adm. Code 218.187(b) (1), (b) (2), (b) (3), (b) (4), or (b) (5).
- i. The VOM content of the as-used cleaning solutions does not exceed the following emissions limitations:
- | | kg/l | lb/gal |
|--|-------|--------|
| All other cleaning operations not subject to a specific limitation in 35 Ill. Adm. Code 218.187(b) (1) (A) through (b) (1) (D) | 0.050 | 0.42 |
- ii. The VOM composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20°C (68°F);
- c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 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 only apply to photochemically reactive material.
- d. The Adhesive Application Dip Tanks are subject to the requirements of 35 Ill. Adm. Code 218 Subpart JJ (Miscellaneous Industrial Adhesives). Pursuant to 35 Ill. Adm. Code 218.900(a), except as provided in 35 Ill. Adm. Code 218.900(b), on and after May 1, 2012, the requirements of 35 Ill. Adm. Code 218 Subpart JJ shall apply to miscellaneous industrial adhesive application operations at sources where the total actual VOM emissions from all such operations, including related cleaning activities, equal or exceed 6.8 kg/day (15 lbs/day), calculated in accordance with 35 Ill. Adm. Code 218.904(a) (1) (B), in the absence of air pollution control equipment.
- e. Pursuant to 35 Ill. Adm. Code 218.901(b), the owner or operator of adhesive application operations listed in 35 Ill. Adm. Code 218.901(b) shall comply with the following VOM emission limitations, minus water and any compounds that are specifically exempted from the definition of VOM, as applied. If an adhesive is used to bond dissimilar substrates together, the substrate category with the highest VOM emission limitation shall apply:

| | kg VOM/l adhesive or adhesive primer applied | lb VOM/gal adhesive or adhesive primer applied |
|--|---|--|
| i. General adhesive application operations Rubber | 0.250 | (2.1) |
| ii. Specialty adhesive application operations Sheet rubber lining installation | 0.850 | (7.1) |
| 4a. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Rubber Tire Manufacturing, 40 CFR 63 Subpart XXXX because the source is not a rubber tire manufacturing facility. | | |
| 5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements. | | |
| 6a. This permit is issued based on the Adhesive Application Dip Tanks not being subject to 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 218.187(a)(2), notwithstanding 35 Ill. Adm. Code 218.187(a)(1)(B)(xii): Cleaning operations for emission units within the miscellaneous industrial adhesives category shall be exempt from the requirements of 35 Ill. Adm. Code 218.187(b), (c), (d), (e), (f), and (g). | | |
| b. This permit is issued based upon rubber molding operations not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart PP: Miscellaneous Fabricated Product Manufacturing Processes. This is a result of the federally enforceable production and operating limitations of this permit, restricting potential to emit to less than 25 tons per year. | | |
| 7a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312. | | |

- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 8a. Pursuant to 35 Ill. Adm. Code 218.187(c), the owner or operator of a subject source shall demonstrate compliance with 35 Ill. Adm. Code 218.187 by using the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.187(g) and by complying with the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.187(e).
- b. Pursuant to 35 Ill. Adm. Code 218.901(e), the owner or operator of a source subject to 35 Ill. Adm. Code Part 218 Subpart JJ shall apply all miscellaneous industrial adhesives using one or more of the following methods:

- i. Electrostatic spray;
 - ii. High volume low pressure (HVLP) spray;
 - iii. Flow coating. For the purposes of 35 Ill. Adm. Code 218 Subpart JJ, flow coating means a non-atomized technique of applying coating to a substrate with a fluid nozzle with no air supplied to the nozzle;
 - iv. Roll coating or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application;
 - v. Dip coating, including electrodeposition. For purposes of 35 Ill. Adm. Code 218 Subpart JJ, "electrodeposition" means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created;
 - vi. Airless spray;
 - vii. Air-assisted airless spray; or
 - viii. Another adhesive application method capable of achieving a transfer efficiency equal to or better than that achieved by HVLP spraying, if the method is approved in writing by the Illinois EPA.
- c. Pursuant to 35 Ill. Adm. Code 218.901(f), the owner or operator of a source subject to 35 Ill. Adm. Code Part 218 Subpart JJ shall comply with the following work practices for each subject miscellaneous adhesive application operation at the source:
- i. Store all VOM-containing adhesives, adhesive primers, process-related waste materials, cleaning materials, and used shop towels in closed containers;
 - ii. Ensure that mixing and storage containers used for VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials are kept closed at all times except when depositing or removing those materials;
 - iii. Minimize spills of VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials;
 - iv. Convey VOM-containing adhesives, adhesive primers, process-related waste materials, and cleaning materials from one location to another in closed containers or pipes; and
 - v. Minimize VOM emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment

cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

- 9a. In the event that the operation of this source 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 nuisance.
- b. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the Electrostatic Precipitator such that the Electrostatic Precipitator is kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
- 10a. Operation of and VOM emissions from the rubber molding operations (forty-four large and twenty-four small rubber molding presses) shall not exceed the following limits:

| Rubber Throughput | | Emission | VOM Emissions | |
|-------------------|----------------|---------------------|-------------------|------------------|
| <u>lb/Month</u> | <u>lb/Year</u> | <u>lb/lb Rubber</u> | <u>Tons/Month</u> | <u>Tons/Year</u> |
| 2,824,268 | 28,242,678 | 0.000956 | 1.35 | 13.50 |

These limits are based on the maximum rubber throughput and emission factors developed by Rubber Manufacturers Association for selected rubber mix compositions.

- b. VOM usage and emissions from cement and adhesives application, clean-up, lubrication and sleeve marking shall not exceed 0.9 tons/month and 9.0 tons/year. The emissions of VOM shall be determined from the following equation:

$$E = \sum (S_j \times C_j \times d_j) - \sum (W_k \times C_k)$$

Where:

E = VOM emissions (tons);

S_j = Supporting material usage (gallons);

C_j = VOM content of the supporting materials (% by weight);

d_j = Density of the supporting materials (lbs/gallons);

W_k = Certified amount of waste materials sent off for disposal (gallons);

C_k = Certified VOM content of waste materials (lbs/gallons).

- c. Emissions of particulate matter from the curing ovens shall not exceed the following limits:

| Material Throughput | Emission Factor | PM Emissions |
|---------------------|-----------------|--------------|
|---------------------|-----------------|--------------|

| <u>Oven Type</u> | <u>(Tons/Mo)</u> | <u>(Tons/Yr)</u> | <u>(lb/Ton)</u> | <u>(lb/Mo)</u> | <u>(Tons/Yr)</u> |
|------------------|------------------|------------------|-----------------|----------------|------------------|
| Controlled | 60 | 540 | 4.8 | 290 | 1.30 |
| Uncontrolled | 60 | 540 | 6.8 | 410 | 1.80 |

These limits are based on the maximum production rate and emission measurements performed at the facility.

- d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.9 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- e. 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).
- 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Conditions 12 and 13 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

12. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 13a. Pursuant to 35 Ill. Adm. Code 218.187(g) (1), testing to demonstrate compliance with the requirements of 35 Ill. Adm. Code 218.187 shall be conducted by the owner or operator within 90 days after a request by the Illinois EPA, or as otherwise specified in 35 Ill. Adm. Code 218.187. Such testing shall be conducted at the expense of the owner or operator and the owner or operator shall notify the Illinois EPA in writing 30 days in advance of conducting the testing to allow the Illinois EPA to be present during the testing;
- b. Pursuant to 35 Ill. Adm. Code 218.187(g) (2), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.187(b) (1), and to determine the VOM content of cleaning solvents and cleaning solutions, shall be conducted as follows:
 - i. The applicable test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) shall be used; provided, however, Method 24 shall be used to demonstrate compliance; or
 - ii. The manufacturer's specifications for VOM content for cleaning solvents may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a); provided, however, Method 24 shall be used to determine compliance. In the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test shall govern;
- c. Pursuant to 35 Ill. Adm. Code 218.187(g) (3), testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
- d. Pursuant to 35 Ill. Adm. Code 218.902(b), testing to demonstrate compliance with the VOM content limitations in 35 Ill. Adm. Code 218.901(b) shall be conducted as follows:
 - i. Method 24 shall be used for non-reactive adhesives. If it is demonstrated to the satisfaction of the Agency and the USEPA that plant adhesive formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a facility's formulation data, the Method 24 test will govern;

- ii. Appendix A of 40 CFR 63, Subpart PPPP shall be used for reactive adhesives.
 - iii. The manufacturer's specifications for VOM content for adhesives may be used if the specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.902(b) (1) and (b) (2), as applicable.
14. 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.
15. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 16a. Pursuant to 35 Ill. Adm. Code 218.187(e) (3), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b) (1) shall collect and record the following information for each cleaning solution used:
- i. For each cleaning solution that is prepared at the source with automatic equipment:
 - A. The name and identification of each cleaning solution;

- B. The VOM content of each cleaning solvent in the cleaning solution;
 - C. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
 - D. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
 - E. The VOM content of the as-used cleaning solution, with supporting calculations; and
 - F. A calibration log for the automatic equipment, detailing periodic checks;
- ii. For each batch of cleaning solution that is not prepared at the source with automatic equipment:
- A. The name and identification of each cleaning solution;
 - B. Date, time of preparation, and each subsequent modification of the batch;
 - C. The VOM content of each cleaning solvent in the cleaning solution;
 - D. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
 - E. The VOM content of the as-used cleaning solution, with supporting calculations. For cleaning solutions that are not prepared at the site but are used as purchased, the manufacturer's specifications for VOM content may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 Ill. Adm. Code 218.105(a);
- c. Pursuant to 35 Ill. Adm. Code 218.187(e)(4), all sources complying with 35 Ill. Adm. Code 218.187 pursuant to the requirements of 35 Ill. Adm. Code 218.187(b)(2) shall collect and record the following information for each cleaning solution used:
- i. The name and identification of each cleaning solution;
 - ii. Date, time of preparation, and each subsequent modification of the batch;

- iii. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
 - iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and
 - v. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with the applicable methods and procedures specified in 35 Ill. Adm. Code 218.110;
- c. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- d. Pursuant to 35 Ill. Adm. Code 218.904(b)(4), all sources subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart JJ shall retain all records required by 35 Ill. Adm. Code 218.904 for at least three years and make those records available to the Illinois EPA upon request.
- e. Pursuant to 35 Ill. Adm. Code 218.904(c)(2), the owner or operator of an adhesive application operation subject to the limitations of 35 Ill. Adm. Code 218.901 and complying by means of 35 Ill. Adm. Code 218.901(b) shall collect and record the name, identification number, and VOM content of each adhesive as applied each day by each adhesive application operation complying with 35 Ill. Adm. Code 218.901(b).
- 17a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the Conditions in this permit:
- i. Records addressing use of good operating practices for the Electrostatic Precipitator:
 - A. Records for periodic inspection of the Electrostatic Precipitator with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. The names of raw rubber compounds and their amounts (tons/month and tons/year) used in molding presses;
 - iii. Usage of all VOM-containing materials (gallons/month and gallons/year);
 - iv. VOM and HAP content of all VOM-containing materials used at the source (% by weight);

- v. Density of all VOM-containing materials used at the source (lbs/gal);
 - vi. Certified amount of waste materials sent off for disposal (tons/month, tons/year);
 - vii. Certified VOM content of waste materials (weight %);
 - viii. Material throughput separately for controlled and uncontrolled curing ovens (tons/month and tons/year); and
 - ix. Monthly and annual PM, VOM, and HAP emissions from the source with supporting calculations (tons/month and tons/year).
- b. 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 storage device) 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.
18. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 19a. Pursuant to 35 Ill. Adm. Code 218.187(e)(2)(B), all sources subject to the requirements of 35 Ill. Adm. Code 218.187 shall at least 30 calendar days before changing the method of compliance between 35 Ill. Adm. Code 218.187(b)(1), (b)(2), (b)(4), or (b)(5) and 35 Ill. Adm. Code 218.187(b)(3), notify the Illinois EPA in writing of such change. The notification shall include a demonstration of compliance with the newly applicable subsection;
- b. Pursuant to 35 Ill. Adm. Code 218.904(b)(2), all sources subject to the requirements of 35 Ill. Adm. Code Subpart JJ shall:
- i. At least 30 calendar days before changing the method of compliance in accordance with 35 Ill. Adm. Code 218.901(b), (c), and (d), notify the Illinois EPA in writing of the change. The notification shall include a demonstration of compliance with the newly applicable subsection;
 - ii. Notify the Illinois EPA in writing of any violation of the requirements of 35 Ill. Adm. Code Subpart JJ within 30 days following the occurrence of the violation and provide records documenting the violation upon request by the Illinois EPA;

- c. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 20a. 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 Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or 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.
- b. 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 permit, please contact Jocelyn Stakely at 217/785-1705.

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

Date Signed: _____

ECB:JRS:jws

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Rubber Adhesive Bonding and Rubber Parts 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, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such 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 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) | | | |
|--|-------------------------------|------------|------------|-------------|
| | <u>PM</u> | <u>VOM</u> | <u>HAP</u> | <u>HAPs</u> |
| Forty-Four Large and Twenty-Four Small Rubber Molding Presses | | 13.50 | | |
| Cement and Adhesives Application, Clean-Up, Lubrication and Sleeve Marking | | 9.00 | | |
| Controlled Curing Ovens | 1.30 | | | |
| Uncontrolled Curing Ovens | <u>1.80</u> | <u>--</u> | <u>--</u> | <u>--</u> |
| Totals | 3.10 | 22.50 | 7.9 | 19.9 |