



- 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 212.321(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).
- 3. Pursuant to 35 Ill. Adm. Code 215.301, 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 source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K (Use of Organic Material) shall apply only to photochemically reactive material.
- 4a. 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 a result 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,
- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESAHP) for Paint Stripping And Miscellaneous Surface Coating at Area Sources, 40 CFR Part 63 Subpart HHHHHH because the clear coating guns will not be used to perform spray application of coatings that contain the target HAP, as defined in 40 CFR 63.11180, to a plastic and/or metal substrate on a part or product
- 5a. 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 filters associated with the spray booths such that the filters are kept in

proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

- 6a. Emissions and operation of the four coating booths shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>Tons/Month</u>	<u>Tons/Year</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
2.10	24.50	2.10	24.50

These limits are based on the maximum coating usage, the maximum VOM content of the coatings and a material balance.

- b. This permit is issued based on negligible emissions of Particulate Matter (PM) from the four paint booths. For this purpose, emissions from each emission unit shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- c. Emissions and operation of the gluing operations shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>Tons/Month</u>	<u>Tons/Year</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
0.45	4.50	0.45	4.50

These limits are based on the maximum glue usage, the maximum VOM content of the glue and a material balance.

- d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from this source shall exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 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 and the NESHAP for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP.
- e. The VOM and HAP emissions shall be determined from the following equation:

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

where:

- E = VOM or HAP emissions (lbs);
- M<sub>i</sub> = VOM or HAP-containing material usage (gallons);
- d<sub>i</sub> = Density of material (lbs/gallon);
- V<sub>i</sub> = VOM or HAP content of material (% by weight);

$W_j$  = certified amount of waste shipped-off (lb);

$V_j$  - certified VOM or HAP content of the waste (% by weight).

- f. Compliance with 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).
- 7a. 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 Condition 8 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
8. 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.

9. 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.
10. 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.
- 11a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Records addressing use of good operating practices for the paint booth filters:
    - A. Records for periodic inspection of the paint booth filters 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 name and identification number of each coating as applied each day;

- iii. Coating and solvent usage (gal/month and gal/year);
  - iii. Coating and solvent density (lb/gal);
  - iv. Coating and solvent VOM and HAP content (% by weight);
  - v. Glue usage (gal/month and gal/year);
  - vi. Density of glue (lb/gal);
  - vii. VOM and HAP content of glue (% by weight);
  - viii. Certified amount of waste shipped off site (lb/month and lb/year);
  - ix. Certified VOM and HAP contents of the waste (% by weight); and
  - x. Monthly and annual emissions of PM, VOM, and HAP 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.
12. 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.
- 13a. 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  
2009 Mall Street  
Collinsville, Illinois 62234

It should be noted that this permit has been revised so as to include the operation of the equipment described in Construction permit 12040012.

It should also be noted that each direct-fired gas dryer used for a washing, cleaning, coating or printing line, with a rated heat input capacity of less than 2930 kW (10 mmBtu/hr) are exempt from permitting requirements, pursuant to 35 Ill. Adm. Code 201.146(fff).

If you have any questions on this permit, please call German Barria at 217/785-1705.

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

Date Signed: \_\_\_\_\_

ECB:GB:jws

cc: Illinois EPA, FOS Region 3  
Lotus Notes

Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the Painted Sports Helmets 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/year for VOM, 10 tons/year for any single HAP and 25 tons/year for any combination of 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 Unit</u>	E M I S S I O N S (Tons/Year)			
	<u>PM</u>	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAPs</u>
Four Paint Booths	0.44	24.50		
Gluing operation	--	4.50	--	--
Total	0.44	28.50	9.00	22.50