

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Rotation Dynamics Corporation  
Attn: Mike Elliott  
8140 Cass Avenue  
Darien, Illinois 60561-5013

Application No.: 78010040  
Applicant's Designation:  
Subject: Rubber Roller Manufacturing  
Date Issued: January 19, 2001  
Location: 2512 West 24th Street, Chicago

I.D. No.: 031600EXG  
Date Received: August 21, 2000  
Expiration Date: January 19, 2006

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of a vulcanizer, three curing autoclaves, a urethane mixer with curing oven, an extruder, a calender and two painting stations 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 to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year of volatile organic materials (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled 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.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. This permit is issued based upon adhesive application operations not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart PP: "Miscellaneous Fabricated Product Manufacturing Processes". This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year.
- b. This permit is issued based upon the painting operations being exempt from control requirements of 35 Ill. Adm. Code 218.204 due to compliance with exemption level of 218.208(a): daily VOM emission never exceeding 15 lbs/day.
- 3a. Operations and VOM emissions of roller assembly operations shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Content</u> (Wt.%)	<u>VOM Emissions</u>	
	(Ton/Mo)	(Ton/Yr)		(Ton/Mo)	(Ton/Yr)
Adhesive	0.5	4.0	85	0.4	3.4
Solvent	2.0	18.0	100	2.0	18.0

These limits define the potential emissions of the VOM and HAPs and are based on the actual emissions determined from maximum production capacity. 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. This permit is issued based on negligible emissions of volatile organic materials from vulcanizer, rubber mixer, curing and painting operations. For this purpose, emissions from each emission source shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.
5. 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.
6. No person shall cause or allow any visible emissions of particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.
7. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, 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 Agency. 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 Clean Air Act Permit Program permit from the Agency.
8. The Permittee shall maintain monthly records of the following items:
  - a. Names and amounts of adhesives used {ton/mo, ton/yr};
  - b. Names and amounts of solvents used (ton/mo, ton/yr);
  - c. Names and amounts of paint used (ton/mo, ton/yr);
  - d. VOM and HAP content in items (a) - (c) (wt. %);
  - e. Names and amounts of raw materials used in rubber rolls manufacturing (ton/mo, ton/yr);
  - f. VOM and HAP emission calculations (ton/mo, ton/yr).

9. 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 Agency and USEPA upon request. Any records retained in a computer shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond them to an Agency request for records during the course of a source inspection.
10. 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  
9511 West Harrison  
Des Plaines, Illinois 60016

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: adhesives, paint and solvents usage.

It should be noted that the boiler, curing ovens and rubber rollers surface machining equipment are exempt from state permit requirements pursuant to 35 Ill. Adm. Code 201.146(d), (fff) and (aa), respectively.

If you have any questions on this, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:VJB:psj

cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from rubber rollers 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. This is usage of 4.0 tons of adhesive, less than 0.5 tons of paint, 18.0 tons of solvents and processing less than 500 tons of rubber per year. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP and 25 tons per year for totaled 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.

1. Operations and VOM emissions of roller assembly operations shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM Content</u> (Wt.%)	<u>VOM Emissions</u>	
	(Ton/Mo)	(Ton/Yr)		(Ton/Mo)	(Ton/Yr)
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2. This permit is issued based on negligible emissions of volatile organic materials from vulcanizer, rubber mixer, curing and painting operations. For this purpose, emissions from each emission source shall not exceed nominal emission rate of 0.1 lb/hour and 0.44 ton/year.
3. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, 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 Agency. 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 Clean Air Act Permit Program permit from the Agency.

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