217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
SOLVENT CLEANING MACHINE - NESHAP SOURCE - REVISED

PERMITTEE

R. S. Owens & Co., Inc.
Attn: Ed Murawski
5535 North Lynch Avenue
Chicago, Illinois 60630

Application No.: 92100008 I.D. No.: 031600FPE
Applicant's Designation: TROPHY & PLAQUE MFG. Date Received: September 21, 2004
Subject: Trophy Manufacturer
Date Issued: February 9, 2005 Expiration Date: February 9, 2010
Location: 5521-5525 North Lynch Avenue, Chicago, 60630

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

One Batch Vapor Degreaser
Remelt Pot
14 Hand Cast Pots
4 Center Cast Pots
Coating Operation Consisting of 3 Spray Booths Controlled by a Filter with 3 Electric Ovens
6 Silk Screen Presses with Gas Fired Dryer and Electric Dryer
Polyester Resin Casting Process
Polyester Cast Painting Operation
Silicone Rubber Mold Manufacturing Process
Polyurethane Mold Manufacturing Process
Clean Up Operations

Plating Operation:

20 Plating Tanks
5 Sulfuric Acid Tanks
5 Hot Water Rinse Tanks
3 Cleaning Tanks
Nickel Strip Tank
Nitric Acid Tank
Bright Dip Tank

Etching Operation:

Nitric Acid Etcher
Ferric Chloride Etcher
Developer

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 for volatile organic material (VOM) and 10 tons/year for single hazardous air pollutant (HAP) and 25 tons/year for total 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. The batch vapor degreaser solvent cleaning machine(s) are subject to 40 CFR part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning. The Illinois EPA is administering this regulation in Illinois on behalf of the United States EPA under a delegation agreement. The United States EPA issued this final rule on December 2, 1994.

b. The Permittee must be in compliance with 40 CFR Part 63, Subpart T - National Emissions Standards for Halogenated Solvent Cleaning on or before December 2, 1994 or immediately upon startup whichever is later.

3. This permit is issued for the coating operation based on its not being required to meet the requirements of 35 Ill. Adm. Code 218.204(j) by qualifying for the exemption in 218.208(a). To quality for this exemption, emissions of VOM from all coating lines must not exceed 15 lbs/day before the application of capture systems and control devices.

4a. Emissions and operation of the batch vapor degreaser shall not exceed the following limits:

Solvent Usage		VOM (HAP) Emissions	
(Gallons/Month)	(Gallons/Year)	(Tons/Month)	(Tons/Year)
160	1,600	0.98	9.76

These limits are based on maximum solvent usage, trichloroethylene as the solvent used with a density of 12.2 lb/gallon, and emissions determined by material balance. 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.

b. For determination of compliance with the limits of this permit, solvent usage (trichloroethylene) shall be determined by the following equation:

$$U = V - (W \times P)$$

Where:

U = Solvent usage for compliance determinations (gallons).

V = Virgin solvent[A] added to the solvent cleaning machines (gallons), as determined by daily addition log sheets.

W = Waste solvent[B] removed from the solvent cleaning machines and sent off-site for reclamation or disposal, as determined by monthly manifests.

P = Percent concentration of solvent in waste, as determined by analysis/testing[C].

[A] For purposes of this permit, virgin solvent is defined as unused solvent.

[B] For purposes of this permit, waste solvent is defined as used solvent.

[C] The percent concentration of solvent in waste (P) shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Method 8260.

c. Compliance with the monthly organic material emission limits shall be calculated using the solvent density as specified in the Material Safety Data Sheet, and the solvent usage (U) per month, as follows:

Emissions (lbs/Month) = Solvent Usage (U) (Gallon/Month) x Solvent Density (Lbs/Gallon)

d. The Permittee shall use only trichloroethylene as solvent in the batch vapor degreaser.

5. Emissions of volatile organic material (VOM) and operation of the coating operation shall not exceed the following limits:

	VOM Usage		VOM Emissions	
Material	(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
Coating	0.28	2.74	0.28	2.74

These limits define the potential emissions of VOM and are based on maximum material usages, maximum VOM content, and the equation for VOM usage in Condition 19(c)(iv). 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.

6. Emissions of volatile organic material (VOM) and operation of the six silk screen presses shall not exceed the following limits:

	VOM Usage		VOM Emissions	
Material	(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
Inks & Thinners	0.07	0.66	0.07	0.66

These limits define the potential emissions of VOM and are based on maximum material usages, maximum VOM content, and the equation for VOM usage in Condition 19(c)(iv). 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.

7. Emissions of volatile organic material (VOM) and operation of the polyester resin casting process shall not exceed the following limits:

	Usage		VOM Content	Emission Factor	VOM Emissions	
Material	(Tons/Mo)	(Tons/Yr)	(%)	(%)	(Tons/Mo)	(Tons/Yr)
Resin	5.0	49.5	37	2	0.04	0.37
Catalyst	0.3	3.0	100	66	0.20	1.98
				Total	0.24	2.35

These limits define the potential emissions of VOM and are based on maximum material usages, maximum VOM content, and standard emission factors. 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.

8. Emissions of volatile organic material (VOM) and operation of the polyester cast painting operation shall not exceed the following limits:

	VOM Usage		VOM Emissions	
Material	(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
Coating	0.08	0.74	0.08	0.74

These limits define the potential emissions of VOM and are based on maximum material usages, maximum VOM content, and the equation for VOM usage in Condition 19(c)(iv). 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.

9. Emissions of nitrogen oxides (NO_x) and operation of the etching operation shall not exceed the following limits:

	Usage		Emission Factor	NO_x Emissions	
Material	(Tons/Mo)	(Tons/Yr)	(%)	(Tons/Mo)	(Tons/Yr)
Nitric Acid	2.5	25	5	0.13	1.25

These limits define the potential emissions of NO_x and are based on maximum material usages and standard emission factors. 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.

10. Emissions of volatile organic material (VOM) and operation of the clean up process shall not exceed the following limits:

Material	Usage (Gal/Mo)	Usage (Gal/Yr)	VOM Content (Lb/Gal)	VOM Emissions (Tons/Mo)	VOM Emissions (Tons/Yr)
Clean Up Solvents	20	200	7.66	0.08	0.77

These limits define the potential emissions of VOM and are based on maximum material usages and maximum VOM content. 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.

11a. This permit is issued based on negligible emissions of volatile organic material from the silicone rubber manufacturing process and polyurethane mold manufacturing process. For this purpose emissions from each emission source, shall not exceed nominal emission rates of 0.02 lb/hour and 0.05 tons/year.

b. This permit is issued based on negligible emissions of particulate matter, volatile organic material, and sulfuric acid mist from the plating operation. For this purpose emissions of each contaminant, shall not exceed nominal emission rates of 0.05 lb/hr and 0.22 ton/yr.

c. This permit is issued based on negligible emissions of particulate matter from the remelt and cast pots. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

d. This permit is issued based on negligible emissions of particulate matter from the coating operation, etching operation, and silk screen presses. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

12a. Emissions and operation of all fuel combustion emission source shall not exceed the following limits:

Material	(mmscf/Mo)	(mmscf/Yr)	Pollutant	Emission Factor (Lb/mmscf)	Emissions (Ton/Mo)	Emissions (Ton/Yr)
Natural Gas	7.0	70	NO_x	100	0.35	3.5
			CO	84	0.3	3.0
			VOM	5.5	0.1	0.2

These limits define the potential emissions of NO_x, CO, and VOM and are based on maximum fuel usage and standard emission factors. Compliance with annual limits shall be determined from a running total of 12 months of data.

b. Natural gas shall be the only fuel used in the fuel combustion sources. Use of any other fuel other than natural gas requires a permit revision.

13. 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 Illinois EPA. 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 Illinois EPA.

14. The batch vapor degreaser shall be operated according to the following operating and equipment requirements of 35 Ill. Adm. Code 218.183:

a. Operating Requirements: No person shall operate the batch vapor degreaser unless:

i. Solvent carry out emissions are minimized by allowing parts to dry within the degreaser until visually dry;

ii. The degreaser is not loaded to the point where the vapor level would drop more than 10 cm (4 in) when the workload is removed from the vapor zone;

iii. Solvent leaks are repaired immediately;

iv. Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;

v. Water is not visually detectable in solvent exiting from the water separator; and

vi. Exhaust ventilation exceeding 20 cubic meters per minute per square meter (65 cubic feet per minute per square foot) of degreaser open area is not used, unless necessary to meet the requirements of the Occupational Safety and Health Act (29 U.S.C. Section 651 et. seq.).

b. Equipment Requirements: No person shall operate the batch vapor degreaser unless;

i. The degreaser is equipped with a cover designed to open and close easily without disturbing the vapor zone;

ii. The degreaser is equipped with the following switches;

A. One which shuts off the sump heat if the amount of condenser coolant is not sufficient to maintain the designed vapor level;

B. One which shuts off the spray pump if the vapor level drops more than 10 cm (4 in) below the bottom condenser coil; and

C. One which shuts off the sump heat source when the vapor level exceeds the design level.

iii. A permanent conspicuous label summarizing the operating procedure is affixed to the degreaser.

15. Each solvent cleaning machine must meet the following base design requirements, pursuant to 40 CFR, Part 63.463.

a. Each solvent cleaning machine must be equipped with an idling or downtime mode cover that completely covers the machine openings. The cover must be periodically inspected to ensure that it remains free of cracks, holes, and other defects. The cover must be closed at all times except during the cleaning, solvent removal, maintenance and monitoring of the degreasers.

b. A freeboard ratio of 0.75 or greater must be maintained for each solvent cleaning machine.

c. Each solvent cleaning machine must have an automated parts handling system that handles parts from initial loading to removal of cleaned parts. If the Permittee wants to use manual hoist, the Permittee must demonstrate to the Illinois EPA that the hoist can never exceed 11 feet per minute.

d. Each solvent cleaning machine must be equipped with a liquid and vapor level control device(s) that shuts off the sump heat if the sump liquid level drops to the sump heater coils or the vapor level rises above the height of the primary condenser and such device(s) must be operational at all times.

e. Each solvent cleaning machine must be equipped with a primary condenser to provide continuous condensation or rising solvent vapors and to create a controlled vapor zone.

f. Each solvent cleaning machine with lip exhaust control must be controlled by a carbon adsorption unit.

16. The Permittee shall comply with the following work and operational practice, requirements and post in the work place a one page summary of work practices, pursuant to 40 CFR Part 63.463(d).

a. Conduct maintenance as per manufacturer's recommendation to ensure that each solvent cleaning machine works properly. Any alternative maintenance practice must be approved by the USEPA.

b. Each solvent cleaning machine shall be covered to minimize air disturbances in the machine and the room at all times except during the cleaning, removal of solvent, maintenance and monitoring. If a cover cannot be used, air disturbances shall be controlled by Reduced Room Draft. Room draft shall not exceed 50 feet/minute.

c. i. A speed of 3 feet/minute or less shall be maintained between entry and removal of parts basket or parts.

or

ii. Parts basket or parts size shall be less or equal to 50% of the solvent air interface area.

d. If cleaning operation involves spraying, spraying must be performed within the vapor zone (i.e., a baffled or enclosed area of the solvent cleaning machine).

e. The Permittee must ensure that parts or parts basket are positioned so that solvent drains freely and parts basket or parts are not removed from the machine until parts are clean and solvent dripping has stopped.

f. During the startup, the Permittee must turn on the primary condenser prior to turning on the sump pump and during shutdown, turn off the sump heater prior to turning off the primary condenser.

g. The Permittee must add and remove solvent with leak-proof couplings. The end of the pipe or hose introducing or withdrawing the solvent be located beneath the liquid solvent surface (i.e., submerged filling) in the sump.

h. The Permittee must collect and store the waste solvent, still bottoms, and sump bottoms in a closed container. Absorbent materials such as sponges, fabric, wood, and paper products shall not be cleaned.

i. Each operator of a solvent cleaning operation must be ready to take and pass an Operator Test at any time during the normal operation of the plant.

17. Each solvent cleaning machine must meet the following control combination (freeboard refrigeration device, freeboard ratio of 1.0, and reduced room draft) requirements, pursuant to 40 CFR Part 63.463:

a. For Freeboard Refrigeration Device (FRD), chilled air blanket temperature at the center of the air blanket shall not exceed 56.7EF while using trichloroethylene, respectively.

i. The temperature measurements must be conducted on weekly basis at the center of the air blanket above the vapor zone during the idling mode. The temperature measurements can be taken by attaching a thermometer or a thermocouple to the parts basket or hoist hook and lowering it into the machine so that it is in the center of the air blanket above the vapor zone.

b. i. The Permittee shall ensure and obtain certification from the manufacturer that the freeboard height is greater than or equal to the width of the interior freeboard. Freeboard ratio shall be determined by dividing the height of freeboard to the smallest interior freeboard width. If the freeboard ratio is less than 1.0 , the Permittee shall immediately correct the freeboard ratio.

ii. Record of Freeboard Ratio and any modification to the Freeboard Ratio.

c. For Reduced Room Draft (RRD), windspeed in room or within enclosure must be less than or equal to 50 feet/minute.

i. If windspeed in room is maintained by controlling room conditions, an initial test and a quarterly test shall be conducted to establish room condition. Also, room condition must be reestablished immediately if condition change. The Permittee shall monitor room condition every week.

ii. If windspeed in room is maintained by using a enclosure, an initial and a monthly test shall be conducted to measure windspeed in enclosure. Also, windspeed in the enclosure must be remeasured immediately if condition change. The Permittee shall inspect condition of enclosure every month.

18a. The Permittee shall comply with the following monitoring procedures requirements, pursuant to 40 CFR Part 63.466.

i. The Permittee shall conduct monitoring and record the results on a weekly basis for Free Board Refrigeration Device, pursuant to 40 CFR Part 63.466(a)(1). A thermometer or thermocouple shall be used to measure the temperature at the center of the air blanket during the idling mode.

b. The Permittee shall comply with the following monitoring procedures, pursuant to 40 CFR Part 63.466(c).

i. The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

ii. The monitoring shall be conducted monthly. If after the first year no exceedances of the hoist speed are measured the Permittee may begin monitoring the hoist speed quarterly.

iii. If an exceedance of the hoist speed occurs during quarterly monitoring the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.

iv. If the Permittee can demonstrate to the Illinois EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 11 feet per minute, the required monitoring frequency is quarterly, including during the first year of compliance.

c. The Permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters as per following procedures, pursuant to 40 CFR Part 63.466(d).

i. Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the following procedure.

A. Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.

B. Orient a velometer in the direction of the wind current at each of the four corners of the machine.

C. Record the reading for each corner.

D. Average the values obtained at each corner and record the average wind speed.

ii. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

iii. If an enclosure (full or partial) is used to achieve a reduced room draft, the owner or operator shall conduct an initial monitoring test and thereafter, monthly monitoring tests of the windspeed within the enclosure using the procedure specified above and a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.

A. Determine the direction of the wind current in the enclosure by slowly rotating a velometer inside the entrance to the enclosure until the maximum speed is located.

B. Record the maximum wind speed.

19a. The Permittee shall retain the following records on paper or computer disk for the lifetime of the solvent cleaning machine, pursuant to 40 CFR Part 63.467(a):

i. An owners manual or a written maintenance and operating procedure for each machine and each piece of control equipment.

ii. The installation date of each machine. If installation date isn't available, a letter certifying that machine was installed prior to or on or after November 29, 1993, to determine compliance option for existing or new source.

iii. Records of the halogenated HAP solvent content of each solvent used in each solvent cleaning machine.

b. The Permittee shall retain the following records in electronic or written form for a period of 5 years, pursuant to 40 CFR Part 63.467(b).

i. The results of control device monitoring required under 40 CFR Part 63.466.

ii. The Permittee shall keep the weekly freeboard air temperature measurements.

iii. The Permittee shall keep weekly records of room condition and windspeed or monthly enclosure inspection results and windspeed measurements.

iv. Record of freeboard ratio and any modification to the freeboard ratio.

v. Estimates of annual solvent consumption for each solvent cleaning machine.

c. The Permittee shall maintain records of the following items:

i. Amount of solvent used in the degreaser by keeping records of the virgin solvent added to the process (gallon), certified amount of waste shipped off for recycling (gallon), certified VOM content of waste solvent (wt. %), and using the equation in Condition 4(b) (gallons/month and gallons/year);

ii. Amount of each individual coatings, inks, and thinners used in the coating operations, polyester cast painting operation and silk screen presses (gallon or lb/month and gallon or ton/year);

iii. VOM content of each individual coatings, inks, and thinners used in the coating operations, polyester cast painting operation, and silk screen presses (lb VOM/gallon or percent weight);

iv. VOM usage with supporting calculations for the coating operations, polyester cast painting operation, and silk screen presses. The following equations shall be used to calculate VOM usage:

$$T_e = \sum_{i}^{n} A_i B_i$$

Where:

T_e = VOM Usage in units of lb/month;

n = Number of different coatings, inks, and thinners used each month;

i = Subscript denoting an individual coating, ink, and thinner;

A_i = Weight of VOM per volume of each individual coating, ink and thinner used each month in units of lbs VOM/gallon or weight percent of VOM of each coating used each month (% weight); and

B_i = Amount of each individual coating, ink, and thinner used each month in units of gallons/month or lb/month; and

v. Amount of clean up solvent used (gallons/month and gallons/year);

vi. VOM content of each clean up solvent used (lb/gallon);

vii. Amount of resin and catalyst used in the polyester resin casting process (tons/month and tons/year);

viii. VOM content of each resin and catalyst used (percent weight);

ix. Amount of nitric acid used in the etching operation (tons/month and tons/year);

x. Natural gas usage (mmscf/month and mmscf/year);

xi. Daily records of the name and identification of each coating as applied on each coating line;

xii. Daily records of the VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied on each coating line;

xiii. Daily emissions of VOM (lb/day) from all coating lines; and

xiv. VOM emissions of the source with supporting calculations (tons/month and tons/year).

20. The Permittee shall comply with the following reporting requirements, pursuant to 40 CFR Part 63.468:

a. An initial statement of compliance report demonstrating each machine is in compliance must be submitted no later than 150 days after startup. The initial compliance report shall include the following:

i. Name and address.

ii. Facility location address.

iii. A list of control equipment (i.e., FRD, RRD) used on each machine to comply with the rule.

iv. For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.

v. For RRD, the weekly record of non-temperature and windspeed or monthly enclosure inspection results and windspeed measurement.

b. An annual compliance report must be submitted by February 1, of the year following the year the report covers. The compliance report shall include the following:

i. A statement, signed by the owner or operator or someone designate, stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required by 40 CFR 63.463(d)(10)."

ii. Solvent consumption and HAP emissions for each machine in lb/month and ton/year, for the reporting period.

c. An exceedance report shall be submitted every 6 months if there is not an exceedance, and every 3 months if there is an exceedance. If an exceedance did not occur the report would consist of a statement certifying that there were no exceedances. The frequency of the exceedance report will increase to quarterly after an exceedance occurs. The quarterly exceedance report shall include the following:

i. Information on the actions taken to comply with 40 CFR Part 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

ii. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

iii. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

21. The Permittee shall comply with the following reporting requirements, pursuant to 35 Ill. Adm. Code 218.211(b).

a. A certification to the Illinois EPA that the coating line or group of coating lines is exempt under the provisions of Section 218.208(a). Such certification shall include:

i. A declaration to the Illinois EPA that the coating line or group of coating lines is exempt from the limitations of Section 218.204 because of the provisions of 218.208(a).

ii. Calculations which demonstrate that the combined VOM emissions from the coating line or group of coating lines never exceed 15 lbs/day before the application of capture systems and control devices. The following equation shall be used to calculate total VOM emissions:

$$Te = \sum_{j=1}^{m} \sum_{i=1}^{n} (AiBi)i$$

Where:

Te = Total VOM emissions from coating lines each day before the application of capture systems and control devices in units of lbs/day;

m = Number of coating lines at the source that otherwise would be subject to the same subsection of Section 218.104 of this Part;

j = Subscript denoting an individual coating line;

n = Number of different coatings applied each day on each coating line;

i = Subscript denoting an individual coating line;

Ai = Weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line in units of lbs VOM/gal; and

Bi = Volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line in units of gal/day.

b. The Permittee shall notify the Illinois EPA of any record showing that total VOM emissions from the coating lie or group of coating lines exceed 15 lbs in any day before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.

22. 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 or USEPA 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 or USEPA request for records during the course of a source inspection.

23. If there is an exceedance of 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. 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.

24. 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

It should be noted that the sanders, polishers, and shotblasts all controlled by baghouses, and die casting machines, are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 210.146(aa), (ii), (d), and (c), respectively.

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

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

DES:GMK:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the trophy and plaque manufacturing 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. The resulting maximum emissions are below the levels, e.g., 25 tons per year of VOM and 10 tons/year for single hazardous air pollutant (HAP) and 25 tons/year for total HAPs. 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.

	Annual Emissions				
	VOM	NO_x	PM	CO	H_2SO_4 Mist
Emission Unit	(Ton/Yr)	(Ton/Yr)	(Ton/Yr)	(Ton/Yr)	(Ton/Yr)
Batch Vapor Degreaser	9.76				
Coating Operation	2.74				
Silk Screen Inks & Thinners	0.66				
Polyester Resin Casting					
Resin	0.37				
Catalyst	1.98				
Polyester Cast Painting					
Coating	0.74				
Etching		1.25			
Cleanup	0.77				
Silicone Rubber & Polyurethane	0.05				
Plating Operations	0.22		0.22		0.22
Remelt & Cast Pots			0.44		
Coating Operation			0.44		
Etching Operation			0.44		
Silk Screening Operation			0.44		
Fuel Combustion	0.2	3.5		3	
Totals:	17.49	4.75	1.98	3	0.22

GMK:psj