

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Bell Racing Company
Attn: Chuck Giebel
116 East Neal Drive
Rantoul, Illinois 61866

Application No.: 08070050

I.D. No.: 019065ABQ

Applicant's Designation:

Date Received: July 22, 2008

Subject: Paint Booth and Cleaning Process Modification

Date Issued:

Location: 116 East Neal Drive, Rantoul, Champaign County

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of modification of mold powder coating booth to add liquid coating capability and addition of new helmet cleaning solvent as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on construction of the modification of mold coating booth and addition of new cleaning solvent not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically 40 CFR 52.21 Prevention of Significant Deterioration of Air Quality. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the volatile organic material (VOM) emissions from the above-listed equipment below the levels that would trigger the applicability of these rules.
 - b. This permit is issued based on the emission of Hazardous Air Pollutants (HAP) as listed in Section 112(g) of the Clean Air Act from the above-listed equipment being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from the above-listed equipment not triggering the requirements of Section 112(g) of the Clean Air Act.
 - c. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
2. Operation of the equipment listed above is allowed under this permit until final action is taken on the Federally Enforceable State Operating Permit (FESOP) application for this source.

- 3a. 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 212.321(a), 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).
4. 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 shall only apply to photochemically reactive material.
- 5a. This permit is issued based on the mold coating operations not being subject to 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 a 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, which have been established in this permit.
- b. This permit is issued based on the mold coating and clean-up operations not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWWW. This is a result of the federally enforceable production and operating limitations, which restrict a 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, which have been established in this permit.

6a. 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 odor nuisance.

b. This permit is issued based on the use of acetone to clean the spray guns on the mold coating line.

7a. Emissions and operation of the solvent-based molding coating and helmet cleaning operations shall not exceed the following limits:

i. Material usage:

<u>Material</u>	Material Usage	
	<u>(lb/Month)</u>	<u>(lb/Year)</u>
Primer	559.52	5,595.20
Polymerization Initiator	8.94	89.44
Methylene Chloride	842.40	8,424.00

ii. Material Properties:

<u>Material</u>	<u>VOM Content (% by Wt)</u>	<u>Single HAP Content (% by Wt)</u>	<u>Combined HAP Content (% by Wt)</u>
Primer	29.83	19.67	20.19
Polymerization Initiator	21.17	--	--
Methylene Chloride	100.00	100.00	100.00

iii. Emissions of PM, VOM, and HAP:

<u>Material</u>	VOM		Single HAP		Combined HAPs	
	<u>lb/Mo</u>	<u>Ton/yr</u>	<u>lb/Mo</u>	<u>Ton/yr</u>	<u>lb/Mo</u>	<u>Ton/yr</u>
Primer	166.90	0.83	110.06	0.55 ¹	112.97	0.56
Polymerization Initiator	1.89	0.01	--	--	--	--
<u>Methylene Chloride</u>	--	--	842.40	4.21 ²	842.40	4.21
Totals:		0.84		4.21		4.77

¹ Styrene Total: 0.55 tons/year

² Methylene Chloride Total: 4.21 tons/year

These limits are based on the maximum material usage at the maximum hourly production rate and 2,080 hours/year of operation.

b. This permit is issued based on negligible emissions of particulate matter (PM) from the solvent based mold coating operation. For this purpose, emissions from the solvent based mold coating operations shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

- c. 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).
- 8a. 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 9 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 9. 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.
- 10. 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.

11. 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.
- 12a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Names and amounts of raw materials used (tons/month, tons/year);
 - ii. VOM and HAP content of raw materials (weight %); and
 - iii. Monthly and annual PM, VOM, and HAP emissions from the solvent-based molding coating and helmet cleaning operations with supporting calculations (lbs/month, 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) 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.

13. 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.
14. 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, IL 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 - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

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

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

ECB:VJB

cc: Region 3