

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
 PETITION OF ROYAL FIBERGLASS)
 POOLS, INC. FOR AN ADJUSTED) AS 09-4
 STANDARD FROM 35 ILL. ADM. CODE) (Adjusted Standard - Air)
 215.301

**RESPONSES OF PETITIONER ROYAL FIBERGLASS POOLS TO QUESTIONS
 FROM THE ILLINOIS POLLUTION CONTROL BOARD**

Comes now Petitioner Royal Fiberglass Pools, Inc. ("Royal") and submits the following responses to the questions from the Illinois Pollution Control Board (the "Board") attached to the Hearing Officer's Order of June 4, 2009.

SECTION 28.1.c.

1. The petition on page 13 states, "By complying with the Composites MACT, Royal has limited its VOM emissions and also decreased the amount of solid and hazardous waste Royal generates." Would you please elaborate on Royal's reduction of solid and hazardous waste resulting from compliance with MACT?

As part of MACT compliance, Royal converted its resin spray applicators to low-emitting non-atomized applicators. The non-atomized applicators reduce the amount of overspray, and therefore the amount of solid and hazardous waste generated. Although not required by the MACT standard, Royal has eliminated all colored backcoat gelcoats and now uses just white backcoat. This requires less flushing of the gelcoat lines, and as a result, less waste gelcoat material is generated.

2. If granted, will the adjusted standard be submitted to USEPA for inclusion in the Illinois SIP?

Royal cannot independently submit revisions to USEPA for inclusion in the Illinois SIP. This decision and action is with the Illinois EPA.

104.406(d)

3. Would you please provide a map indicating the location of the Dix Plant?

Maps showing the location of the Dix Plant were included in Exhibit 1 of the First Amended Petition. Also attached hereto are an additional map and aerial photograph labeled **Exhibit A** and **Exhibit B**, respectively.

4. The petition indicates that Royal's other manufacturing facility is located in Louisiana.

(a) *Are there other states where Royal Fiberglass Pools, Inc. has similar manufacturing facilities?*

No. The only other Royal composite pool manufacturing facility is located in Breaux Bridge, Louisiana.

(b) *Do any of those states have state-specific limitations on VOM emissions beyond the MACT? If so, how does Royal Fiberglass Pools, Inc. address compliance in other states?*

Royal is not aware of any pounds/hour VOM emission limitation in Louisiana.

5. *Please describe the area affected. What is the ozone attainment status of the county in which the Dix Plant is located? Is the ozone attainment status poised to be changed in the near future?*

The Dix Plant is located in Jefferson County. As of June 9, 2009, Jefferson County is in attainment for all Criteria Pollutants. To our knowledge, the attainment status for Jefferson County is not poised to change.

6. *In Section 2 of the Technical Document, the chart entitled "January 2005: Monthly HAP/VOC/MACT Emissions Log for the Royal Pools Dix Facility" was printed larger than the page, so the table on the far right appears to have been cut off. If so, would you please resubmit the table with the missing information?*

While we have not included the referenced chart as an exhibit to the First Amended Petition, attached for your convenience is this same chart for July 2009, labeled as **Exhibit C**.

7. *In general, the most recent data provided appears to be from 2005.*

(a) *Would you please comment on any change in quantities or materials used since then?*

This question is addressed in more detail in the First Amended Petition. In short, there have been some changes in quantities and materials. In particular, the facility is seeking a production level of 400-pools-per-year instead of the original 250 pools-per-year. Further, the historical data for 2006, 2007, and 2008 shows higher per pool material usages than originally assumed from the 2005 data. Some of the increased usage is due to a new two-part gelcoat finish that requires twice as much gelcoat. This new finish has become quite popular and is now the standard finish demanded by most pool owners. Also, Royal has more accurate information now than it did in 2005 about the amounts of materials needed to make pools at the Dix facility.

(b) *If possible, would you please submit information reflecting the most recent available data?*

This is included in the Exhibit 2 to the First Amended Petition.

(c) *Although the Technical Document Section 3 at page 5 states that 250 pools per year is a more reasonable estimate than the 400 pools per year used in the CAAPP permit application, would you please comment on any anticipated growth or change in operations.*

As stated above, Royals now seeks 400-pools-per-year in anticipation of increased demand after the recession ends. It is hoped that many of Royal Pools competitors will go out of business due to the recession, so Royal should enjoy increased market share.

(d) *Section 2 of the Technical Document on page 9 makes a calculation based on "Reducing the maximum annual production rate from 250 to 200 pools per year..." and comments, "A facility-wide production cap of 220 pools per year would reclassify the Dix Plant as a synthetic minor source - the maximum emission rate would be just under the major HAP source emission threshold of 10 tpy." Is Royal Pools considering revising their CAAPP Permit application to reflect a production cap of 220 pools per year and a HAP emission threshold of 10 tpy?*

No. In 2006, Royals Pools was informed by IEPA that lowering the production to 220 pools was not a solution to the compliance issue. Further, Royal is now a major HAP source. According to EPA's "once-in-always-in" policy, Royal has no reason to lower the emission cap to below the major-source threshold of 10 tpy single HAP.

8. *Royal Pools states that, "EPA explained that the annual emission rate and the facility CAAPP status have no bearing on compliance with 35 IAC 215 Subpart K." TSD Section 4 at 2. Would you please comment on the maximum potential to emit on an hourly basis if production were capped at 400 pools per year, or at 220 pools per year?*

There would be no change in the maximum hourly rate at 400-pools-per-year versus 220. While the total annual emissions depends on the number pools built per year, the hourly rate is not affected by the total number of pools produced. Even at an annual rate of 220 pools per year, the Dix facility could have a maximum hourly emission as high as when it manufactures 400 pools per year.

9. *In Section 3 of the Technical Document on page 5, the Pool Production Schedule indicates a typical work schedule of two pools per day during 100% full production, with the "greatest hourly gelcoat process emission rate" of 64.86 lb/hr. In Section 2, the chart of "Hourly Potential-to-Emit HAP/VOC for the Royal Pools Dix Facility/Maximum Hourly Baseline" indicates maximum hourly usage of 17.421b VOM/hour for resin application, 36.781b VOM/hour for gelcoat application, 0.08 lb VOM/hour for catalyst, plus 1 lb VOM/hour for mold wax.*

(a) *Would you please explain the difference in the "maximum hourly baseline" and the "hourly potential-to-emit" and indicate which the chart in Section 2 is depicting?*

As stated above, the maximum hourly rate has changed since 2005. The referenced charts are now obsolete. Please see Exhibit 2 to the First Amended Petition.

(b) *Would you please indicate the overall maximum potential hourly VOM emissions?*

The new maximum hourly rate is 156.7 lbs VOM per hour, which is referenced in the First Amended Petition. The maximum hourly rate assumes that the two largest pool models would be gelcoated at the same time. Although this would rarely happen, it may occur a few times per year at peak production. Since there is no practical way to monitor and record hourly production activity, the maximum hourly rate is assumed for the worst-

case scenario. However, if the two smallest pool models were being gelcoated at the same time, the VOM emissions would only be 40 lbs per hour.

(c) *Since Royal can produce 2 pools per day at 100% full production, would you please comment on the scenario that both pools would undergo gelcoat application during the same hour?*

This is the worst case operating scenario (from an emissions standpoint), especially at two-shift 400 pools-per-year operations, and represents the greatest hourly emission rate. Also, "two-pools-per-day" is an average production rate assuming two-shift operation. Royal has a variety of pool sizes from small to large. The small pools take one to two days to complete, the larger pools take more than two days to make from start to finish. The maximum hourly rate of 156.7 lbs of VOM per hour referenced above is based on two pools being gelcoated at the same time.

(d) *Does Royal Pools have an operating procedure in place that would limit gelcoat application and curing to one pool at a time?*

No. There is no such operating procedure in place.

(e) *Would Royal Pools please comment on including such a limitation in the adjusted standard conditions?*

Royal strongly opposes such a limitation. This would cause an unacceptable bottleneck in production and is not likely to reduce hourly emissions to any great extent. For example, if the Dix facility waited to gelcoat a second pool until after a first pool had been gelcoated and cured, the first pool would be ready for application of resin (while the second pool was being gelcoated) which also generates VOM emissions (as discussed in Exhibit 2 of the First Amended Petition). In addition, such a limitation would make it very difficult to produce 400 pools per year and would significantly increase production costs. It would also be impractical for Royal to monitor and demonstrate compliance with such a limitation on a continuous basis.

(f) *Would you please comment on including a condition in the adjusted standard limiting the adjusted standard to Royal's current operations and limiting the maximum hourly VOM emissions to 64.86 lb/hr?*

The 64.86 lb/hr value is now obsolete. The new absolute worst-case maximum hourly rate is 156.7 lbs/hr. Since Royal anticipates that there will be a cap of 400 pools per year in its permit, there is no need to also have a worst-case lb/hour limitation. As stated above, emissions at this worst-case rate or anything approaching it would be rare, only happening at the times that two pools were being gelcoated at the same time. In addition, such a limit would also impose additional, impractical monitoring and recordkeeping in order to demonstrate compliance with such a provision.

10. *Would you please define MMA, AMS, DMP, MEK (MEKP) referenced in Section 2 of the Technical Document.*

These are common abbreviations for some of the process chemicals used throughout the composites industry:

MMA – methyl methacrylate
AMS – alpha methyl styrene
DMP – dimethyl phthalate
MEK – methyl ethyl ketone
MEKP – methyl ethyl ketone peroxide

11. *In Section 2 of the Technical Document, the chart entitled, "Maximum Hourly Baseline: Hourly Potential-to-Emit HAP/VOC for the Royal Pools Dix Facility" lists "Bondo" having a 12.57% Styrene Emission Factor and a 100% Other VOC Emission Factor. The information under VOC Content (Styrene, MMA, AMS, Other), however, is blank for Bondo. Is information available on the HAP/VOC content of Bondo? Since Bondo is not listed in the 2005 Monthly HAP/VOC/MACT Emissions Logs, would you please comment on how seldom it is used?*

The Dix Plant does not currently use Bondo, so this question is not applicable.

12. *In AS 04-1, Crownline used booths equipped with dry filter medium to reduce particulate emissions; lower styrene-content gelcoat (33.4%); panel filters built in each side of the laminating area to control particulate emissions; tanks equipped with submerged inlets to reduce splashing and release of VOMs when filling; and flow-coat spray guns for lamination to reduce VOM emissions experienced with previous air atomized guns. (AS 04-1 Pet. at 5-6.) Would you please comment on the potential to employ such efforts at Royal's Dix Plant?*

Royal Pools already employs all of these techniques. The gelcoats at Dix range from 24% to 38% styrene and 3% to 10% MMA. These are all MACT compliant.

104.406(e)

13. *The petition on pages 5-6 states, "Specifically, Royal investigated the following alternatives: (1) reducing VOM content in production materials; (2) using alternative operating procedures and methods; and (3) installing add-on emission control technologies." The Technical Document Section 3 provides details of the evaluation of add-on emission controls, however, details do not seem to be provided for the other two alternatives mentioned. Would you please elaborate numbers (1) and (2) above?*

Royal has ceased using clear gelcoat which has a higher VOM content than the white gelcoat that Royal currently uses as its base component. In discussions with its supplier, Royal understands that lower VOM materials are not available for pool production, because such materials do not provide the corrosion protection that is necessary for high quality swimming pool parts. Royal is willing to use lower VOM content gelcoat if they can provide the same corrosion protection as the products Royal currently uses.

There are no alternative methods (e.g., closed mold process) for production of such a large composite part as an outdoor swimming pool.

14. In Sec. 2 of the Technical Document, the chart entitled "Hourly Potential-to-Emit HAP/VOC for the Royal Pools Dix Facility" lists the HAP/VOC content of the materials used. The petition on page 7 states that the white gelcoat used contains the lowest feasible monomer contents of 28% styrene and 3% MMA. Sections 2 and 3 also indicate 161,800 lb of resin (47.5% styrene) and 3136 lb of MEKP Catalyst (2% MEK, 37% DMP) were used in 2005. Did Royal Pools investigate the availability of or experiment with other lower HAP/VOC content materials? If so, would you please document your efforts?

See response to question 13 above.

15. Section 3 of the Technical Document on page 10 states, "Non-atomizing gelcoat equipment is available that might reduce the gelcoat emission rate. However, the available non-atomizing equipment will not provide an acceptable surface finish and has failed to reduce gelcoat emissions as promised by the manufacturer." Would you please document your efforts to evaluate the non-atomizing gelcoat equipment?

The non-atomized gelcoat equipment has been discredited by the South Coast Air Quality Management District and the American Composites Manufacturing Association in independent testing since they have been shown to have the same emissions as the atomized gelcoat equipment.

16. In the Federal Register, USEPA estimates there are approximately 435 existing major source facilities that will be subject to the Federal rule 40 CFR 63 Subpart WWWW. Annual compliance costs for all existing major source facilities were estimated at \$21.5 million. This included capital, materials, monitoring, recordkeeping, and reporting costs. (68 FR 19381)

(a) What costs has Royal incurred to meet the Federal rule?

Royal spent approximately \$40,000 to upgrade its resin sprayers to non-atomized applicators.

(b) Has Royal estimated the additional compliance costs associated with monitoring, recordkeeping and reporting?

Royal incurred consulting fees of approximately \$10,000 in establishing a system to track, record and report its emissions under the MACT standard. Royal also incurs ongoing consulting costs of \$1500 per year to track and report its emissions. In addition, the legal fees and consulting costs Royal has incurred to seek an adjusted standard have been significant.

104.406(f)

17. The petition on page two refers to "Royal's Initial MACT Notification Letter" being contained in Section 2 of the Technical Document; however, the letter appears to be missing from that Section. Would you please provide a copy or indicate where it can be found in the record?

Yes. Please see **Exhibit D** attached hereto.

18. *Royal indicates that it meets the Composites MACT by ensuring that all resin containers are closed when not in use and that acetone (non-HAP/non-VOC) is used in resin and gelcoat cleanup. (Pet. at 5.) Royal also indicates that it uses a 28% styrene monomer gelcoat that is "state-of-the-art in low-HAP formulations for swimming pool production." Did Royal switch to this gelcoat to comply with MACT?*

The gelcoat materials that Royal was using were already MACT compliant, but Royal's policy is to use the lowest HAP content materials that produce a high quality swimming pool. It was this policy that caused Royal to use a lower VOM content white gelcoat.

19. *This question is addressed to both the petitioner and the Agency: The Air Quality Impact Analysis for ozone was performed based on the assumption that 25 tons per year would be the maximum VOM emitted and that the 1-hour ozone standard is 120 ppb. However, there are no limitations proposed in the adjusted standard language.*

(a) *Would you please comment on proposing a condition in the adjusted standard language that would limit VOMs to 25 tpy or less.*

Royal Pools' current CAAPP application provides for a PTE of 29.76 tons per year of total VOM emissions. Royal does not object to a limitation in its Title V permit of 30 tons VOM per year.

(b) *Would you also please comment on proposing a condition that would require a reevaluation of the adjusted standard if the ozone NAAQS is revised.*

In the event that Jefferson County is reclassified as non-attainment for ozone at some future date, the impact on the Title V permit at the Dix Plant should be minimal. Add-on VOC emission controls satisfying reasonably available control technology ("RACT") would still be cost prohibitive and the maximum VOC emission rate from the plant would still have negligible impact on the ozone level in the regional air shed area. Under these circumstances, a reevaluation would be of little value.

20. *Could you please indicate if Royal has made a demonstration of compliance with the NESHAP regulations under 40 CFR Part 63 Subpart WWWW to USEPA yet? [40 CFR 63.5840] Did USEPA respond to the compliance demonstration, and if so, how?*

Royal has submitted all required initial and periodic NESHAP MACT demonstrations to USEPA. USEPA has not responded to date.

104.406(g)

21. *This question is addressed to both petitioner and the Agency: The petition on page 10 states, "Royal understands that in 2005, EPA replaced the one-hour average ozone standard with an eight-hour average standard, but believes the hourly calculation presented in the attached Air Quality Impact Analysis is useful given the obvious concerns about hourly emissions that are reflected in the 8 lb/hr Rule." As of March 2008, the primary ozone standard was strengthened from 0.08 parts per million (ppm), set in 1997 to a level of 0.075 ppm averaged over 8 hours (73 FR 16436; March 27,2008).*

(a) *Since the Air Quality Impact Analysis presented in the Technical Document Section 6 is based on the previous ozone standard, would you please provide an analysis of ozone impact in terms of the current ozone NAAQS?*

Royal Pools believes that the impact is the same – negligible.

(b) *Is the Scheffe (Sept. 1988) procedure and table used in Royal Pool's Air Quality Impact Analysis (TSD Sec. 6) the same for determining the ozone increment for either 1-hour as well as 8-hour periods of time?*

Royal Pools believes that the Scheffe Table approach is the only practical and feasible procedure for demonstrating compliance with the one-hour ozone increment. There is no similar procedure at present for demonstrating compliance with an eight-hour average limit.

(c) *Is the Scheffe (Sept. 1988) procedure still the USEPA recommended procedure?*

USEPA has not published any guidance for showing ozone compliance for individual sources, especially very small sources like the Dix Plant. The Scheffe Table approach is the only available feasible procedure. Further, USEPA has not provided any guidance for showing compliance with an eight-hour average ozone limit.

(d) *Please comment on the results of the Air Quality Impact Analysis if the ozone increment were added to the 8-hour background air quality reading of the 4th highest measured ozone concentration from the past 4 consecutive years.*

Royal does not have ready access to the 4-year data referenced above. Further, the Scheffe Table approach, which is based on USEPA's assessment of worst-case one-hour ozone impacts, is not mathematically compatible with assessments of eight-hour average impacts. Finally, the current 8 lb per hour VOM limitation is a one-hour limitation, which is also not applicable to assessments of eight-hour average impacts.

(e) *Has the IEPA provided any guidance in conducting the Air Quality Impact Analysis or indicated appropriate measures if the ozone increment appears to cause or be contributing to a violation of the ozone NAAQS?*

We are not aware of any guidance on assessment of ozone impacts provided by IEPA.

22. This question is addressed to both the petitioner and the Agency: *The Petition at page 12 states, "...the daily amounts of VOM emitted by Royal's operations have a negligible impact on ambient ozone levels and would not cause a violation of the ozone NAAQS..." Since Hamilton County ozone monitoring stations already show exceedences of the 8-hour ozone standard of 75 ppb, would you please comment on including a condition in the adjusted standard limiting Royal Pools VOM emitting operations on ozone action days where ambient conditions are likely to exceed the 75 ppb 8-hour ozone standard?*

Royal would be opposed to such a condition since it would be unworkable from a logistical standpoint. It would require Royal to monitor every day whether the ambient

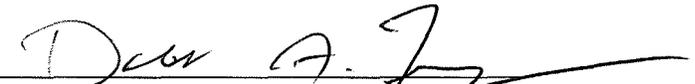
conditions are "likely to exceed" the ozone standard. This raises the question of what "likely to exceed" means. More importantly, it would require Royal to then contact its employees on a daily basis to inform them whether to come into work that day. This is not a workable procedure in order for Royal to continue to operate at the Dix Plant.

23. If Royal were to experience a growth in production, could you please comment on how such growth would affect the VOM emissions on an hourly and 12-month average basis? Would you please comment on including a condition in the adjusted standard that would limit the amount of VOM emissions to a level consistent with the time Royal's adjusted standard petition was submitted?

In its CAAPP application, Royal has requested a cap of 400 pools per year. This level is designed to accommodate growth in production which Royal hopes to achieve after the recession is over. Royal's VOM emissions on an hourly basis and annual basis at a 400 pool per year production level are discussed above and in the First Amended Petition. Royal would strongly oppose a limit in the amount of VOM at a level consistent with the time Royal's adjusted standard petitions was submitted. With the current recession, the current level of pool production is at its lowest in years.

Respectfully Submitted,

BRYAN CAVE LLP

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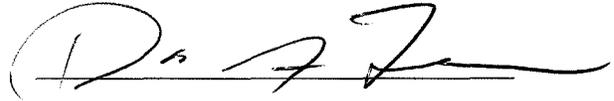
Attorneys for Royal Fiberglass Pools, Inc.

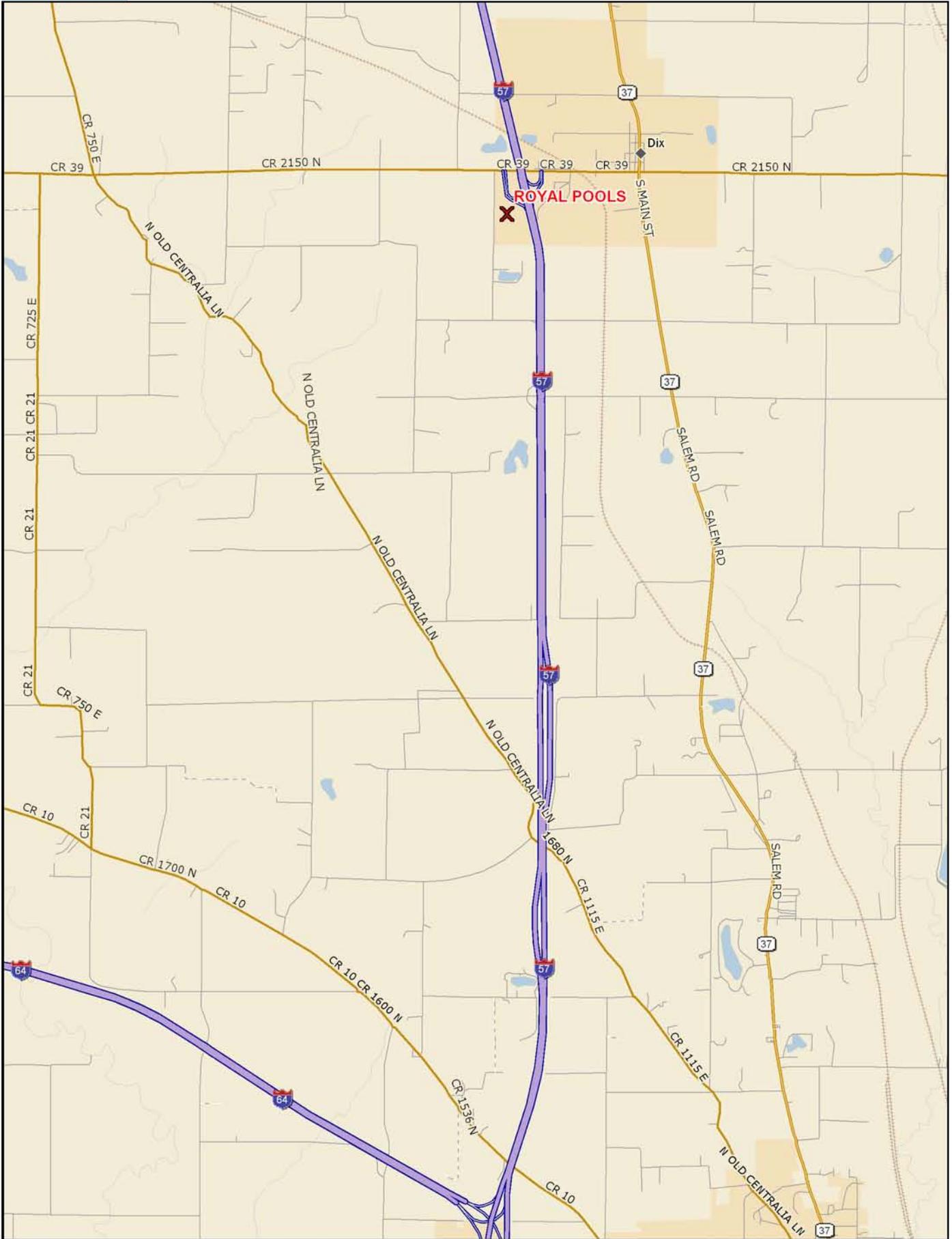
CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing First Amended Petition was served upon the following parties on the 2nd day of October, 2009:

Illinois Pollution Control Board, Attn: Clerk
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James R. Thompson Center, Suite 11-500
Chicago, IL 60601-3218

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
Attn: Charles Matoesian

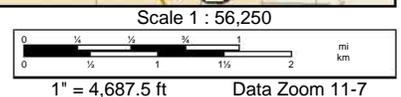
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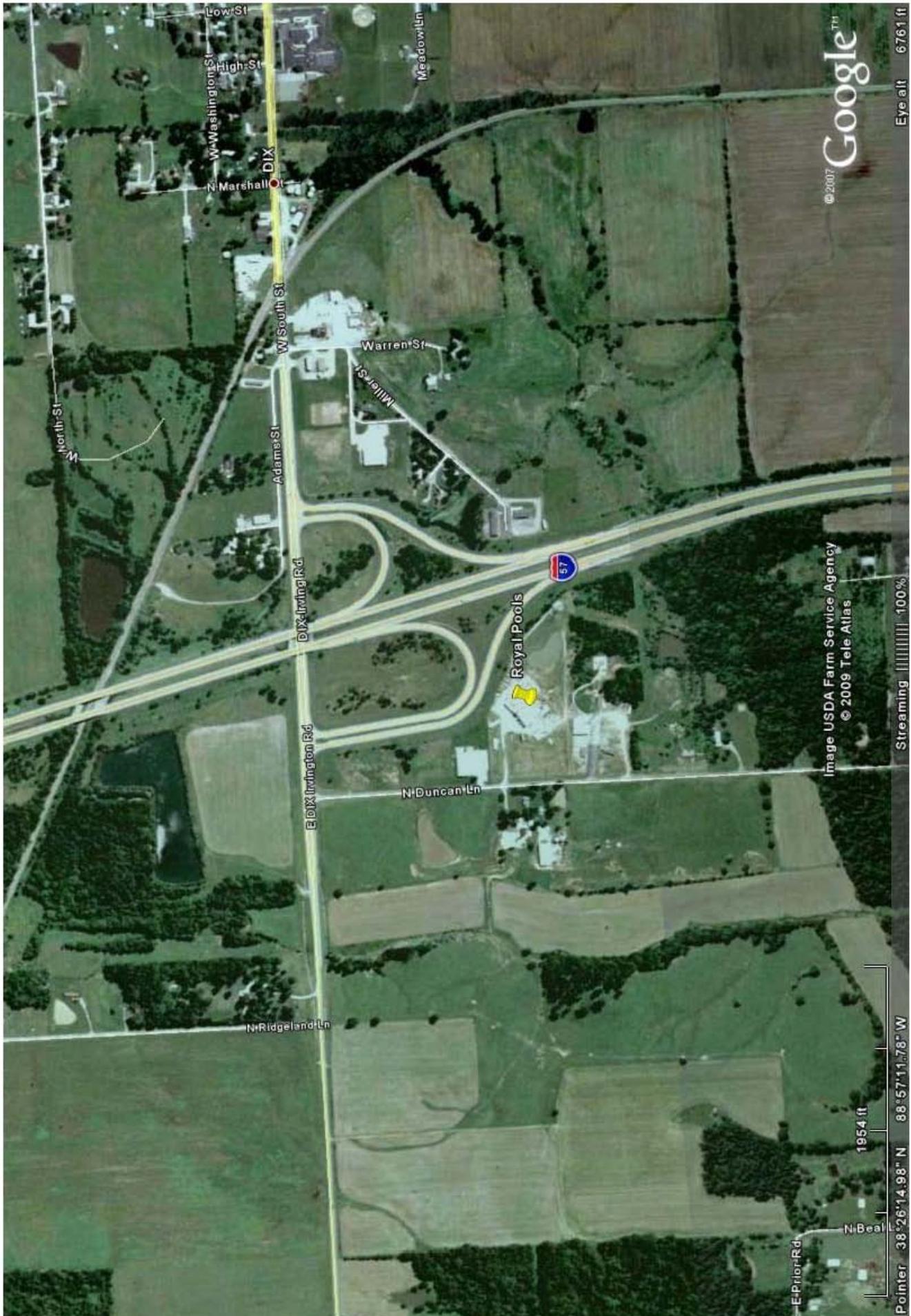


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0408-607
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(618) 266-7088

December 9, 2004

Director
Air and Radiation Division
EPA Region V
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: Royal Fiberglass Pools
Dix, IL
Subpart WWWW Initial Notification

Dear Sir or Madam:

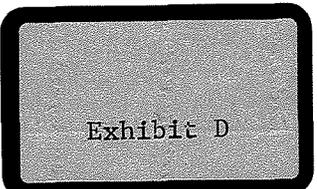
Please accept the enclosed information as our initial notification to 40 CFR Part 63 Subpart WWWW: National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.

We are confident that we will meet the standards for open molding using corrosion resistant products with the HAP emission averaging option.

If you have any questions, please feel free to contact me at 337-332-4386.

Thank you,

Tony Hebert
General Manager



Control Equipment

Since all emissions sources are fugitive, there is not any process control equipment at the plant. All emission reductions are achieved through work practice standards and material selection. Royal Pools utilizes the latest technology in resin and gelcoat application using non-atomized spray guns. They also use a low styrene gelcoat.

Emission Summary

VOC: 32,650 lbs
Styrene: 29,750 lbs
MMA: 2,650 lbs
Dimethyl Phthalate: 80 lbs
MEK: 160 lbs
Acetone: 23,200 lbs

All emissions were calculated using the current Unified Emission Factors compiled by the CFA. Please see Attachment C for a spreadsheet of the calculations and a copy of the emission factors.

MACT

This facility has grown steadily over the past few years. While never reaching major source status for styrene, the facility does foresee continued growth. As such, Royal Pools request to be permitted as a major source. Hence, NESHAP Subpart WWWW applies to this site. An initial notification form will be sent later this year or when the major source threshold has been exceeded. The facility currently meets the MACT standard using the averaging option.

Other Applicable Rules

EPCRA Section 311/312	Yes
EPCRA Section 313	Yes
NSPS - 40 Subpart K	No
NESHAP - 40 CFR Part 63 Subpart WWWW	Yes
Annual Toxic Criteria Pollutant Report	Yes
Chemical Accident Prevention	No

**Royal Fiberglass Pools, Inc.
Dix, Illinois
Air Permit Application Data**

General Data

Royal Pools is located at 312 Duncan Road in Dix, Illinois, Jefferson County. Please see Attachment A for the contact and billing information.

Process Description

Royal Pools fabricates fiberglass swimming pools and spas using the latest technology in resin and gelcoat application, high quality, corrosion resistance resins and gelcoats, and hand lay-up.

Material Usage

Royal Pools requests to be permitted to construct 400 pools per year using the following materials:

Resin: 396,240 lbs
Gelcoat: 88,310 lbs
MEKP: 7,680 lbs
Acetone: 29,000 lbs

Material Safety Data Sheets for the materials listed above are in Attachment B

Emission Sources

Emissions are generated from the fabrication of swimming pools and spas which occurs in a vented warehouse.

Insignificant Activities

1. 250 Gallon Diesel Tank – the vapor pressure of diesel is 0.009 psia making the tank an insignificant source of emissions.
2. 2 Propane Tanks – the propane tanks are under pressure and are not vented
3. Resin Storage Tanks – the resin is stored in a tank designed and patented by Royal Pools. The tanks utilize an internal floating roof to reduce venting and air to resin contact. As such, these tanks are insignificant sources of emissions.

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Tony Hebert
General Manager