

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Federal Signal Corporation for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
2645 Federal Signal Drive  
University Park, Illinois 60466

Site Identification No.: 197072AAC  
Application No.: 83010047

Schedule

Public Comment Period Begins: February 6, 2009  
Public Comment Period Closes: March 8, 2009

Illinois EPA Contacts

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**I. INTRODUCTION**

Federal Signal Corporation has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for their parts manufacturing plant at 2645 Federal Signal Drive in University Park. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

**II. SOURCE DESCRIPTION**

Federal Signal Corporation manufactures light fixtures for cars, sirens, and other devices. This facility has emission units consisting of a vapor degreaser, natural gas combustion units, paint booths, and powder coating booths.

In the vapor degreaser, solvent degreasing is done. Solvent degreasing (or solvent cleaning) is the physical process of using organic solvents to remove grease, fats, oils, wax or soil from various metal, glass or plastic items. Vapor degreasers are batch loaded boiling degreasers that clean with condensation of hot solvent vapor on colder metal parts.

The coatings and solvents contain organic solvents which are emitted to the atmosphere during coating and degreasing as volatile organic material (VOM).

**III. GENERAL DISCUSSION**

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

**IV. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has specific standards for units emitting volatile organic material in the greater Chicago area. The specific standards for coating miscellaneous metal parts are found in 35 Ill. Adm. Code 218 Subpart F, Regulations for Coating Operations. These regulations limit the amount of VOM that may be in the coatings used. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

**V. CONTENTS OF THE PERMIT**

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. The vapor degreaser is subject to 35 Ill. Adm. Code 218.183, which requires the operator of the degreaser to carry out certain operating requirements. This regulation also contains equipment requirements for the degreaser. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold). These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

**VI. REQUEST FOR COMMENTS**

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.

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