

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary
Renewal of their Federally Enforceable State Operating Permit(FESOP)
Wheeling Service & Supply, Inc.
Woodstock, McHenry County

Site Identification No.: 111809AAB
Application No.: 84080068

Schedule

Public Comment Period Begins: April 9, 2014
Public Comment Period Closes: May 9, 2014

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Coordinator: Brad Frost
217/782-7027
Brad.frost@illinois.gov

I. INTRODUCTION

Wheeling Service & Supply, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) renewal for its manufacturing facility at 15920 Nelson Road in Woodstock. 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 permit that it would propose to issue for the plant. However, before issuing 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

Wheeling Service & Supply, Inc. performs metal coil coating operations. The company operates two coating lines controlled by the catalytic afterburner. The metal coils are unwound before entering roller coat applicators which apply a layer of coating. The coating is cured in the attached ovens fired by natural gas. The coating applicators are periodically cleaned with a solvent.

The major air pollutant of concern at this facility is volatile organic material (VOM). The largest source of VOM at this facility is the coating operations. VOM is contained in the paints and solvents. The VOM is evaporated into the atmosphere when these materials are used.

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 applied for 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 to 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 Illinois Pollution Control Board has specific standards for units emitting volatile organic material. The specific standard for this company is 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 or require a pollution control device to reduce the volatile organic material emissions to the atmosphere. There is also a New Source performance Standard (NSPS) for metal coil surface coating. The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing will identify the specific emission standards that apply to the emission units at the plant. 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.)

The permit would also set limitations on the amount of VOM used in the coatings and solvents. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also 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 that 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 issuance of its permit. The Illinois EPA is therefore proposing to issue 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.