

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

Project Summary for an Application from
Hunter Panels, LLC
for Issuance of the
Federally Enforceable State Operating Permit (FESOP) for
9201 Belmont Avenue
Franklin Park, Illinois 60131

Site Identification No.: 031096ANG
Application No.: 99070002

Schedule

Public Comment Period Begins: March 1, 2012
Public Comment Period Closes: March 31, 2012

Illinois EPA Contacts

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I. INTRODUCTION

Hunter Panels, LLC has applied for a revision of its Federally Enforceable State Operating Permit (FESOP) to replace the control device at its Chicago plant. 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

The Hunter Panels manufactures insulated foam panels used by construction industry. Production process consists of mixing two chemical components, polyol and MDI, which react and create solid foam panels. To increase insulation value of the panels liquid pentane is injected in the mixture to fill all voids in the panel. Emission of pentane from the process is controlled by regenerative thermal oxidizer.

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 will operate 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 to operate under 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 of volatile organic material (VOM).

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 emissions of particulate matter (PM) from process and fugitive sources, e.g., 35 IAC, Part 212, Subpart B – Visible Emissions, Subpart K – Fugitive Particulate Matter and Subpart L –

PM Emissions from Process Emission Units. Emission units emitting VOM are regulated by Part 218, e.g., emissions from foam insulation boards manufacturing is regulated by Subpart TT – Other Emission Units. The sources of VOM emissions are also subject to general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The application shows that the plant is in compliance with applicable state 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 process emission units shall not exhibit emission of particulate matter exceeding 30% and fugitive emissions shall not cross property line as specified in Part 212, Subpart B and Subpart K. As explained, insulation board manufacturing operations are subject to Subpart TT and emission limitations of 35 IAC 218.301 which requires limiting VOM emissions from each emission unit to less than 8 lbs per hour. 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 per year of VOM and 10 tons for an individual HAP and 25 tons for combined HAPs.

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.

ECB:VJB: