

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Bell Sports, Inc. for a
Federally Enforceable State Operating Permit (FESOP) for
1924 County Road 300N
Rantoul, Illinois 61866

Site Identification No.: 019817AAH
Application No.: 07050013

Illinois EPA Contacts

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I. INTRODUCTION

Bell Sports Incorporated has applied for a Federally Enforceable State Operating Permit (FESOP) for its sporting goods manufacturing plant at 1924 County Road 300N in Rantoul. 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

Bell Sports located in Rantoul, Champaign County currently operates under an operating permit issued by the Illinois Environmental Protection Agency on August 4, 2006. The facility manufactures sporting and athletic goods, and is covered under Standard Industrial Classification (SIC) Code 3949. Bell Sports' operations include the following emissions units: a helmet assembly process, a helmet coating operation, one diesel-fired emergency generator, several natural gas-fired comfort heating units and a pad-printing operation.

The helmet assembly process consists of gluing padding to baseball helmets. The coating operation consists of spraying paint with hand-held spray gun onto plastic helmets in a coating spray booth. An infrared oven is used to dry the painted helmets.

The coatings and glue contain organic solvents which are emitted to the atmosphere during the coating process and during application of the glue as volatile organic material (VOM). Nitrogen oxides are generated from the fuel combustion process. Nitrogen oxides are formed thermally by a combination of oxygen and nitrogen in the air at a temperature at which fuel is burned.

In addition, sulfur dioxides (SO₂), carbon monoxide (CO), particulate matter (PM) and volatile organic material (VOM) are emissions formed by combustion processes. CO is formed by the incomplete combustion of fuel. SO₂ emissions are mostly generated during the combustion of fuel oil.

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 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 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 natural gas used and organic solvent usage for the printing operation in order to limit emissions. The Permit requires the Permittee to keep records of the materials used that contain VOM and HAP. With the records the Permittee maintains the Illinois EPA can verify compliance with Permit conditions and calculate the Plants air emissions. 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 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 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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