

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Cleveland Steel Container Corporation for a  
Federally Enforceable State Operating Permit (FESOP) for  
117 East Lincoln  
Peotone, Illinois 60468

Site Identification No.: 197075AAA  
Application No.: 95120135

Illinois EPA Contacts

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## **I. INTRODUCTION**

Cleveland Steel Container Corporation has applied for a Federally Enforceable State Operating Permit (FESOP) for its steel pail manufacturing plant at 117 East Lincoln in Peotone. 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 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**

Cleveland Steel Container Corporation (CSC) was founded in 1963. They manufacture steel pails in sizes that vary from 2.5 to 7 gallons. Types of pails manufactured include Nested and Straight Side, Open Head and Tight Head drums. They make a mixture of lithographed and plain pails with a variety of interior linings to accommodate a wide range of products from roof cements to exotic fragrances and lacquers.

The process begins with coils of clean cold rolled steel – this is cut up into flat sheets. The sheets go through a sheet coating line and can be turned into covers or bottoms. Some sheets then go to lithography. The pail assembly line begins at the seam welder complex where a sheet is rolled and welded, this sheet is then sized, beaded and flanged. The bottom and ears are installed before the pail is painted both inside and out. After curing and testing the pail, it then receives a handle, is palletized and shipped to the customer for filling.

### **Pail Coating Line**

Pail containers are coated in the flange spray booth, bottom spray booth and the interior/exterior spray booth. The pail line is equipped with a drying oven following the interior/exterior spray booth. 100 percent of the VOM emissions from the interior/exterior spray booth are captured (permanent total enclosure) and ducted to a thermal oxidizer.

### **Roll Coating Line**

Unfinished metal material is coated in the roll coating line. The metal will be used to shape pails and other containers. 100 percent of the VOM emissions from the roll coating line are captured (permanent total enclosure) and ducted to a catalytic 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 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**

The permit that the Illinois EPA is proposing to issue 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 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 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.

DWH:95120135:jws