

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for a
Construction Permit Application from
Trinity Structural Towers, Inc. for
New Coating Lines
at the Existing Plant in
Clinton, Illinois

Site Identification No.: 039005ABC
Application No.: 08100015

Illinois EPA Contacts:

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Important Dates:

Application Received: October 9, 2008
Public Comment Period Begins: January 27, 2009
Public Comment Period Closes: February 26, 2009

PROJECT SUMMARY

I. INTRODUCTION

Trinity Structural Towers, Inc. has applied for a construction permit to expand its manufacturing plant in Clinton, Illinois. This project requires an air pollution control construction permit because the proposed new coating lines would be a source of emission. The Illinois EPA has prepared a draft of the Construction Permit that it would propose to issue for the project. However, before granting the Construction 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.

II. SOURCE DESCRIPTION

Trinity Structural Towers, Inc. owns and operates a manufacturing plant in Clinton, Illinois that manufactures steel towers that support wind turbine generators. Trinity plans to expand its operations with installation of two new painting or coating lines as well as equipment to prepare surfaces for painting. The plant has two existing coating lines.

The coating lines are sources of emissions because the coatings that would be applied contain organic solvents, which are emitted to the atmosphere during the coating process as volatile organic material (VOM). These solvent also contain components that are considered hazardous air pollutants (HAPs). Emissions of VOM and HAPs are minimized by selection of coating materials and use of lower VOM/HAP coatings. Filters would be used for control of particulate matter emissions from the spray application of coating.

III. EMISSIONS

The source currently operates as a minor source of emissions and is limited to less than 80 tons per year of VOM. With the proposed expansion, the potential emissions of the plant would about triple. As a result, the plant will become subject to Illinois' Clean Air Act Permit Program (CAAPP).

The source has addressed the applicability of 40 CFR 52.21, Prevention of Significant Deterioration (PSD) to the proposed expansion project. The limits in this permit would ensure this expansion does not classify the source as a major source pursuant to these rules (i.e., source wide emissions are less than 250 tons per year of VOM).

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for sources of VOM. This site readily complies with all applicable Board standards.

Because the plant would become a major source of HAP emissions, the new coating lines and the existing coating lines will now be subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating

of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm. The source plans to comply with this regulation by using HAP compliant coatings.

V. DRAFT PERMIT

The permit would identify applicable regulations that govern emissions from the new and modified emission units at the plant. The conditions of the draft permit also contain limitations and requirements to assure that this source will not be considered a major source pursuant to the PSD rules. The permit sets limitations on VOM usage and VOM emissions.

Emissions and operation of all coating operations at the source will be limited to the following:

Material	VOM Usage ^a		VOM Emissions	
	Tons/Mo	Tons/Yr	Tons/Mo	Tons/Yr
Coating	29.4	235.4	29.4	235.4
Solvent	5.5	44.0	0.1	0.9

^a Usage includes material shipped off-site for reclamation or disposal.

The permit conditions also establish appropriate compliance procedures, including recordkeeping requirements and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the plant is operating within the limitations set by the permit and is properly controlling emissions.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the this project meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a construction permit for this modification.

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 Ill. Adm. Code Part 166.