

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Project Summary
Renewal of their Federally Enforceable State Operating Permit (FESOP)
B. L. Downey Company, LLC
Broadview, Illinois

Site Identification No.: 031030ACP
Application No.: 91070104

Schedule

Public Comment Period Begins: July 24, 2014
Public Comment Period Closes: August 23, 2014

Illinois EPA Contacts

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

I. INTRODUCTION

B.L. Downey Company, LLC has applied for a renewal of their Federally Enforceable State Operating Permit (FESOP) for its miscellaneous metal coating operation at the 2115 Gardner Road, Broadview, Cook County, Illinois. 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 renewal 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

B.L. Downey Company, LLC operates a miscellaneous metal coating operation for coating of metal poles and other public areas metal products. The emission units at this plant that require an operating permit include coating lines with preheat and curing ovens, epoxy powder coating lines with curing ovens, preheat dry-off ovens, wash stations, burn-off ovens, touch-up spray area, electrocoat lines with gas-fired curing ovens, hot water boilers, and gas-fired batch oven. These units are sources of emissions because volatile organic material (VOM) generated from the coating lines in the metal coating operation, and natural gas combustion.

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 been operating 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 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. 35 Ill. Adm. Code 218.204(q)(1) specifies the volatile organic material allowed in coating materials for miscellaneous metal parts and products coating and 35 Ill. Adm. Code 218.301 specifies limits of organic material discharge into the atmosphere from any emission source. The application shows that the plant is in compliance with applicable state emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would identify the specific emission standards that apply to the emission units at the plant. As explained, the coating and printing operations are subject to 35 Ill. Adm. Code 218.204(q)(1) and 218.301, which limits volatile organic materials in coatings and volatile organic materials into the atmosphere. 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.

The permit conditions would 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.