

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
Action Athletic Equipment, Inc. for a Revised
Federally Enforceable State Operating Permit (FESOP) for
3144 – 21st Street
Zion, Illinois 60099

Site Identification No.: 097200AAZ
Application No.: 01010020

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Action Athletic Equipment, Inc. has applied to revise their Federally Enforceable State Operating Permit (FESOP) for its manufacturing plant at 3144 – 21st Street in Zion. 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

Action Athletic Equipment, Inc. (Action) is located at 3144 – 21st Street in Zion. The source is engaged in the manufacturing and distribution of sporting and athletic goods. Action primarily assembles foam floor pads for use in indoor athletic activities such as wrestling and gymnastics. Other activities include the repair or refurbishing of curtains, pits, pads and mats.

Two separate operations take place in the manufacture of the foam floor pads at the facility. The first involves cutting gymnastics pads and cover material, gluing the pads, and sewing the covering over the pad. The activities involve cutting and gluing foam pads to the proper dimensions. The second involves coating thinner foam pads with plastisol, gluing them to appropriate dimensions, and coating them with a flexible vinyl coating. Typical pad production is 300 mats per year with an average area of 1,278 square feet per side. The maximum pad production is 500 mats per year with an average area of 1,278 square feet per side.

The coatings and adhesives contain organic solvents which are emitted to the atmosphere during use.

Action is now requesting to change their status in the emission reduction market system. They want to become a participating source. Previously Action had a 15 ton seasonal VOM emission limit. Also, Action is proposing to increase monthly HAP limits.

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. The Board has specific standards for units emitting volatile organic material in the Greater Chicago Area. Action Athletic Equipment's operations are regulated by 35 Ill. Adm. Code 218 Subpart PP Miscellaneous Fabricated Production Manufacturing Processes. The limitation applying is a daily-weighted average limit of 3.5 pounds of VOM per gallon. The source is coating plastic parts and these coatings must comply with the limitation.

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 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:01010020:psj