

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Parsons Company Incorporated for a new
Federally Enforceable State Operating Permit (FESOP) for
Its custom industrial equipment plant in Goodfield, Illinois

Site Identification No.: 179445AAA
Application No.: 12050003

Schedule

Public Comment Period Begins: August 29, 2012
Public Comment Period Closes: September 28, 2012

Illinois EPA Contacts

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I. INTRODUCTION

Parsons Company, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its custom industrial equipment plant for two spray booths and one natural gas-fired bake oven. This facility is located at I-74 Drive Lot 6, Goodfield, Woodford County, Illinois. This facility 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 facility. 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

Parsons Company is a custom manufacturer of products such as heavy earth moving machine buckets, fenders, machining assemblies, roll over protection cabs canopies, guarding and other similar products.

The source operates a coating operation comprised of the following emission units and/or pollution control equipment: two spray booths controlled by fabric filter and one natural gas-fired bake oven.

The coatings and solvents contain organic solvents which are emitted to the atmosphere during the coating process as volatile organic material (VOM). These materials also may contain components that are considered hazardous air pollutants (HAPs).

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.

This facility has requested to operate under a FESOP because the actual emissions of the facility are below the levels at which the facility would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the facility's potential emissions would be such that the facility would be considered a major source. The permit acts to restrict the facility potential emissions so that it is not considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the facility, as would otherwise be required.

The FESOP limits the operation and annual emissions of the facility 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 Illinois Pollution Control Board has specific standards for units emitting volatile organic material. The specific standard for coating metal parts is 35 Ill. Adm. Code 215 Subpart F Regulations for Coating Operations. These regulations limit the amount of VOM that may be in the coatings used. However, this source is limited to less than 25 tons per year for VOM emissions and this is the exemption level to avoid the requirements of Subpart F. There is a National Emission Standard for Hazardous Air Pollutants (NESHAP) for coating of miscellaneous metal parts and products, 40 CFR 63, subpart MMMM. The requirements of the NESHAP apply to major sources of hazardous air pollutants. This source has emission limits in its permit that keep the amount of hazardous air pollutants below major levels therefore the NESHAP regulations do not apply. The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The FESOP permit that the Illinois EPA is proposing to issue would identify specific emission standards that apply to the emission units at the facility. 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 facility is operated as a non-major source. The permit would limit the operation and annual emissions of the facility 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 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 facility is being operated within the limitations set by the permit and the facility'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 this 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.