

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
Jessup Manufacturing Company for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
1701 Rockland Road
Lake Bluff, Illinois 60044

Site Identification No.: 097809AAG
Application No.: 73010370

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Jessup Manufacturing Company has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its coating facility at 1701 Rockland Road in Lake Bluff. 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 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

Jessup Manufacturing Company produces specialty coatings of paper, fabric and felt. The equipment at the facility which requires an air pollution control permit consists of three coating lines controlled by a regenerative thermal oxidizer and a natural gas-fired boiler.

The coatings used contain solvents that contain volatile organic material and hazardous air pollutants (HAPs). The facility uses a capture system and afterburners to reduce the emissions from these pollutants by at least 90%. The facility has limited their coating usage that will keep the emissions below the major source threshold levels of 25 tons per year for VOM and 10 tons per year for HAP. All other air emissions are well below the 100 ton per year major source threshold levels.

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 specific rules that apply to this facility are 35 Ill. Adm. Code 218.207 and 218.204(c). Section 218.204(c) requires that coatings applied without air pollution control should only contain 2.3 pounds of VOM per gallon. Section 218.207 requires afterburner control of coatings applied. This results in at least 81% destruction of the VOM and HAP emissions. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing, 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.)

These limitations are consistent with the historical operation of emission units at the plant.

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 that 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 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.