

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary
Renewal - Federally Enforceable State Operating Permit (FESOP)
Midwestern Rust Proof, Inc.
3636 North Kilbourn Avenue,
Chicago, Illinois

Site Identification No.: 031600CVR
Application No.: 73031889

Schedule

Public Comment Period Begins: September 11, 2014
Public Comment Period Closes: October 11, 2014

Illinois EPA Contacts

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I. INTRODUCTION

Midwestern Rust Proof, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Chicago plant. 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 renewed 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

Midwestern Rust Proof, Inc. performs metal finishing and coating operations. The emission units at this plant that require an operating permit include multiple parts cleaning, electroplating and coating tanks. Heat for plant operations is provided by boilers and process ovens. These units are sources of emissions because volatile organic materials (VOM) and inorganic acids, some of which represent hazardous air pollutants, are released during metal parts cleaning and painting, as well as products of 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 will operate 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 to operate under 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 of VOM and 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 emissions of particulate matter (PM) from process and fugitive sources, e.g., 35 IAC, Part 212, Subpart B – Visible Emissions, Subpart K – Fugitive Particulate Matter and Subpart L – PM Emissions from Process Emission Units.

Emission units emitting volatile organic material are regulated by Part 218, e.g., Subpart E - Solvent Cleaning, Subpart F – Coating Operations. The sources of VOM emissions are also subject to general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The metal processing equipment is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Plating and Polishing Operations, 40 CFR 63 Subpart WWWWWW.

The application shows that the plant is in compliance with applicable state emission standards.

V. CONTENTS OF THE PERMIT

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. The process emission units shall not exhibit emission of particulate matter exceeding 30% and fugitive emissions shall not cross property line as specified in Part 212, Subpart B and Subpart K. As explained, the solvent cleaning degreasers are subject to 35 Ill. Adm. Code 218.182 operational and equipment requirements, the coating operations are subject to 35 IAC 218.204(q) limitations on allowable VOM content of the coatings, and all emission units except coating equipment are subject to 35 IAC 218.301 which requires limiting VOM emissions from each emission unit to less than 8 lbs per hour. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The NESHAP Subpart WWWWWW requires implementation of management practices directed on minimization of possible Hazardous Air Pollutant (HAP) emissions.

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 per year of VOM and 10 tons for an individual HAP and 25 tons for combined HAPs.

The permit conditions would also continue to 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.