

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
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Project Summary for an Application from
T/CCI Manufacturing, L.L.C.
for Issuance of the
Federally Enforceable State Operating Permit (FESOP) for
2120 North 22nd Street
Decatur, Illinois

Site Identification No.: 115015AJV
Application No.: 99030033

Schedule

Public Comment Period Begins: December 27, 2011
Public Comment Period Closes: January 26, 2012

Illinois EPA Contacts

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I. INTRODUCTION

T/CCI Manufacturing, L.L.C. currently operates under federally enforceable state operating permit (FESOP) which was issued five years ago. The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). 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 rerenewed 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

T/CCI Manufacturing is an air conditioner compressor manufacturing plant. The emission units at this plant that require an operating permit include sixteen cold degreasers, one compressor leak-testing tank, one paint booth controlled by water curtain and phenolic resin molding press. These units are sources of emissions because volatile organic materials (VOM) some of which represent hazardous air pollutant are released during metal parts cleaning and painting, product testing and resin molding.

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 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, e.g., 35 IAC, Part 215, Subpart E - Solvent Cleaning, Subpart F – Coating Operations.

The source VOM emissions are subject to the general VOM emission limitation found in 35 IAC 215.301 – Use of Organic Material.

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. As explained, the solvent cleaning degreasers are subject to 35 Ill. Adm. Code 215.182 operational and equipment requirements, the painting booth is exempt from requirements of 35 IAC 215.204(j) limitations on allowable VOM content of the paints due to restricting total paint usage to less than 2,500 gallons per year as allowed by 35 Ill. Adm. Code 215.206(a)(2). All emission units are subject to 35 IAC 215.301 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 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 10 tons for an individual HAP and 25 tons for combined HAPs.

The permit would also set limitations on the emission from resin molding.

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.