

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
The Testor Corporation for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
620 Buckbee Street
Rockford, Illinois 61104

Site Identification No.: 201030AEY
Application No.: 72110997

Illinois EPA Contacts
Permit Analyst: David Hulskotter
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

The Testor Corporation has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its paint and adhesive manufacturing facility at 620 Buckbee Street in Rockford. 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

Testor is a leading manufacturer of paints and cements for hobby and craft applications.

The primary emission sources at the Buckbee Street facilities consist of the paint manufacturing operations which are comprised of the following three operations: the roller mill operations, the ball mill operations, and the floor mixer operations.

The roller mill operations consist of three roller mills, several small upright mixers and wall mixers, and product fill areas. Emissions from the roller mill operations are exhausted through a common manifold over the roller mills and through general building ventilation. For the purposes of this permit application, the roller mill operations have been identified as one process unit.

The ball mill operations consist of five ball mills, several small upright mixers, and product fill and unloading areas. Emissions from the ball mill operations are exhausted through general building ventilation. For the purposes of this permit application, the ball mill operations have been collectively identified as one process unit.

The floor mixer operations consist of three separate in-floor mixers, each used to product a different type of product. These mixers are serviced by several small upright mixers, several small storage tanks, a mix tank, and numerous product fill areas. The floor mixer emissions are exhausted through general building ventilation. The three floor mixers are identified as separate process units within this permit application due to the differences in the raw materials used and the products produced within each mixer.

When mixing is completed the product is transferred to the product filling lines where it is pumped into the cans. Some of the cans

are conveyed to the aerosol can filling lines where propellant is added to the cans.

The principal air contaminant emitted from the facility is volatile organic material (VOM), which is generated during solvent handling/usage throughout the product mixing, conveying, can filling and also from propellant filling operations. The secondary air contaminant emitted from production process is particulate matter (PM), which is released during the dry pigment mixing and handling.

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 application shows that the plant is in compliance with applicable state (AND FEDERAL) 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 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 would also set limitations on the amount of paint and adhesive produced and the amount of aerosol cans filled. Since the production at this facility is limited, therefore the air emissions from this facility are limited. These limitations are consistent with the historical operation of emission units at the plant.

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.