

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary
the Federally Enforceable State Operating Permit (FESOP)
W. R. Meadows, Inc.
Hampshire, Kane County

Site Identification No: 089045AAL
Application No.: 09020034

Schedule

Public Comment Period Begins: April 17, 2014
Public Comment Period Closes: May 17, 2014

Illinois EPA Contacts

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I. INTRODUCTION

W. R. Meadows, Inc. has voluntarily applied for an operating permit for its asphalt construction products manufacturing facility in order to incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. 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 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

W. R. Meadows, Inc. manufactures asphalt based products to be used in construction industry, such as asphalt saturated felt and fiber boards, as well as products for care and maintenance of asphalt and concrete surfaces. The production process consists of several hot asphalt mixing and saturation tanks and cold mixtures mixing tanks. The raw materials and some products are stored in various sizes storage tanks. The principal air contaminant emitted from the facility is Volatile Organic Material (VOM), generated during the VOM-containing materials handling and processing operations. Some of these materials contain hazardous air pollutants (HAP).

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 Clean Air Act and regulations promulgated thereunder. 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 for this program. 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 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 board has specific standards for units emitting volatile organic material in the Greater Chicago area, e.g., 35 IAC, Part 218,

Subpart B: ORGANIC EMISSIONS FROM STORAGE AND LOADING OPERATIONS, Subpart E: SOLVENT CLEANING, Subpart PP: MISCELLANEOUS FABRICATED PRODUCT MANUFACTURING PROCESSES and Subpart QQ: MISCELLANEOUS FORMULATION MANUFACTURING PROCESSES. There are several potentially applicable National Emission Standards for Hazardous Air Pollutants (NESHAP), such as Chemical Manufacturing Area Sources, 40 CFR 63 Subpart VVVVVV and Asphalt Processing and Asphalt Roofing Manufacturing Subpart AAAAAAA. However, the company's operations are not subject to these regulations either due to not using specific materials or not producing specific products. The company's operations are subject to general 35 Ill. Adm. Code requirements of Part 212 - Visible And Particulate Matter Emissions and Part 218 - Organic Material Emission Standards And Limitations For The Chicago Area. The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The 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, manufacturing of asphalt saturated felt and boards is subject to 35 IAC Subpart PP which restricts VOM content of used materials. The emission units emitting less than 2.5 tons of VOM emission per year are eligible from requirements of otherwise applicable Subpart QQ. The facility is exempt from requirements of 35 Ill. Adm. Code part 218 Subparts E due to cleaning solvent usage being below applicability threshold of 500 pounds per month. 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 of VOM, 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.