

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Rollex Corporation for a
Federally Enforceable State Operating Permit (FESOP) for
800 Chase Avenue
Elk Grove Village, Illinois 60007

Site Identification No.: 031440ALU
Application No.: 04080076

Illinois EPA Contacts

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I. INTRODUCTION

Rollex Corporation has applied for a Federally Enforceable State Operating Permit (FESOP) for its manufacturing facility at 800 Chase Avenue in Elk Grove Village. 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

Rollex Corporation manufactures metal siding, facia and trim materials for home construction by coil coating both sides of a chemically treated web of metal.

Coil coating is performed by passing a metal strip through a cleaning section, a chemical treatment station, and followed by a prime coating and finish coating stations. Each coating station is followed by a curing oven and cooling area. The cleaned, coated metal is rewound into a coil. The coil can be slit to various widths for further processing into siding and trim at different roll forming stations.

The process begins with the receipt of the metal coil. These coils are mounted on uncoilers and are fed into the line. The first step is precleaning the strip with a hot wash and rinse, followed by a four stage washer. The strip then proceeds through a chemical treatment bath which treats the surface to improve adhesion of the paint.

The cleaned, treated and dried strip is passed through a primer coating application station which applies a prime coat to the strip. The coating thickness can be different on each side depending on the end use of the strip. The primer coating station is located in a total enclosure so that all fugitive fumes at the coating station are captured and ducted to the oxidizer. The primed strip is then dried in an electric infrared oven and then cooled.

The cooled strip is then passed through the finish coat application station. At this point, a finish coat is applied to one side and a backer coat or coated backside (CBS) is applied on the other side, depending again on its end use. The finish coating station is a total enclosure so that all fugitive fumes at the coating station are captured and ducted to the oxidizer. The finish coat is then cured thoroughly in the finish oven.

The strip is then cooled by air and a water quench prior to being recoiled for further processing.

The process occurs continually, with each step following the other closely. Line speeds can vary from about 50 feet per minute up to 400 feet per minute maximum.

The coatings generate volatile organic material (VOM) emissions. The fumes from the coating and curing process are ducted to a thermal oxidizer where the fumes are converted to carbon dioxide and water vapor.

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 Board has specific standards for units emitting volatile organic material in the greater Chicago area.) The coating operation at Rollex Corporation is subject to a New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60 Subpart TT. This federal regulation requires 90 percent emission reduction of VOM emissions.

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.)

The permit would also set limitations on the amount of coatings and solvents used in order to limit emissions. The Permit requires the Permittee to keep records of the coating and vanishing oil usage. With the records the Permittee maintains the Illinois EPA can verify compliance with Permit conditions and calculate the Plants air emissions. 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 issuance of its permit. The Illinois EPA is therefore proposing to issue 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.

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