

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
TC Industries, Inc. for a
Federally Enforceable State Operating Permit (FESOP) for
3703 South Route 31
Crystal Lake, IL 60012

Site Identification No.: 111813AAE
Application No.: 96030116

Illinois EPA Contacts

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I. INTRODUCTION

TC Industries has applied for a revision to their Federally Enforceable State Operating Permit (FESOP) for its manufacturing plant at 3703 South Route 30 in Crystal Lake. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of 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. The main purpose of the FESOP revision is to incorporate construction permit 12060015.

II. SOURCE DESCRIPTION

TC Industries operates a facility to produce steel parts in Crystal Lake, Illinois. Steel is processed in a variety of ways, including cutting, grinding and other mechanical operations, heat treating, coating and welding. A variety of air emitting equipment is used in these production processes as well as in other support processes which are present at the facility.

The end product produced at this facility is steel parts which are used in a variety of applications. Typically, the parts produced are used as cutting edges, bits and various other applications by heavy construction equipment such as bulldozers, scrapers, loaders, graders, etc.

Parts may be painted using automated "flow coat" operation or in a hand spray booth. VOM emissions are evolved in each case, a portion of which will also be Hazardous Air Pollutants (HAPs). Products of combustion (NO_x, CO and PM) will also be emitted in the gas-fired dryer used on the flow-coat line. (Hand sprayed coatings are air dried so there are no emissions of products of combustion). VOM emissions from both the flow-coat and hand spray lines are uncontrolled. Compliance with applicable VOM regulations is demonstrated by the use of compliant coatings.

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 is seeking 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 Illinois Pollution Control Board has specific standards for units emitting volatile organic material in the Greater Chicago Area. The specific standard for this company is 35 Ill. Adm. Code 218 Subpart F Regulations for Coating Operations. These regulations limit the amount of VOM that may be in the coatings used. The specific regulation is 35 Ill. Adm. Code 218.204(j)(2)(A) extreme performance air dried metal parts coatings. This regulation requires the coatings can not contain more than 3.5 pound of VOM per gallon of coating. There is a National Emission Standard for Hazardous Air Pollutants (NESHAP) for surface coating of miscellaneous metal parts. The requirements of the NESHAP apply to major sources of hazardous air pollutants. This source has emission limits in its permit that keep the amount of hazardous air pollutants below major levels, therefore the NESHAP regulations do not apply. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing to issue 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 conditions 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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