

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Custom Aluminum Products, Inc. for a
Federally Enforceable State Operating Permit (FESOP) for
414 West Division
South Elgin, Illinois 60177

Site Identification No.: 089080AAS
Application No.: 96030089

Illinois EPA Contacts

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I. INTRODUCTION

Custom Aluminum Products, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its manufacturing plant at 414 West Division in South Elgin, Illinois. 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

Custom Aluminum Products is located at 414 West Division, South Elgin in Kane County. This source operates an aluminum extrusion and building products manufacturing facility. The coating process consists of extruded aluminum parts moving through the coating booth on a conveyor and into single stage natural gas fired baking ovens. The coating operations are primary sources of VOM emissions at the plant. The coating and solvents contain organic solvents which are emitted to the atmosphere during the coating process as volatile organic material.

The drying ovens and baking ovens use natural gas. The principal air contaminant emitted from the combustion of natural gas is nitrogen oxides which are generated from the fuel combustion process. Nitrogen oxides are formed thermally by a combination of oxygen and nitrogen in the air at a temperature at which is burned.

In addition, sulfur dioxides (SO₂), carbon monoxide (CO), particulate matter (PM) and volatile organic material (VOM) are emission formed by combustion processes. CO is formed by incomplete combustion of fuel.

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

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. 35 Ill. Adm. Code 218.204(j), Extreme Performance Miscellaneous Metal Parts Coating, requires all coatings used shall not exceed 3.3 pounds of VOM per gallon of coating and metal parts clear coating has a limit of 4.3 pounds of VOM per gallon of coating. The permit will also allow the source to average the VOM contents on a daily basis to meet the applicable VOM content limit. The permit also contains other coating regulations with the applicable VOM content limits. 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 will identify the specific emission standards that apply to the emission units at the plant. As explained, the paint booth is subject to 35 Ill. Adm. Code 218.204(j), which requires extreme performance miscellaneous metal parts and products coatings not to contain more than 3.3 pound of VOM per gallon of coating. 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 would also 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 that 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 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.

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