

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
GSI Technologies, Inc. for a  
Federally Enforceable State Operating Permit  
(FESOP) and a  
Construction Permit for  
311 Shore Drive  
Burr Ridge, Illinois 60527

Site Identification No.: 043419AAR  
Application No.: 09020030 & 10070027

Illinois EPA Contacts

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## **I. INTRODUCTION**

GSI Technologies, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its printing plant. 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. The source has also applied for a construction permit for a screen printing line, roll cleaner and modification to another screen printing line.

## **II. SOURCE DESCRIPTION**

GSI Technologies, Inc. currently operates a printing facility located at 311 Shore Drive in Burr Ridge, Illinois that produces medical electrodes, Smart Cards, RFID systems, and electroluminescent lamps (EL) and industrial print products utilizing flexographic and screen printing processes. The principal air contaminant emitted from the facility is Volatile Organic Material (VOM), generated during the ink application and from solvents usage.

## **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 Board has specific standards for units emitting Volatile Organic Material in the Greater Chicago Area. The applicable rules for screen printing lines are found in 35 Ill. Adm. Code 218 Subpart TT. These regulations require coatings to contain no more than 3.5 pounds per gallon of VOM per gallon of coating. However, the permit limits VOM emissions to below the applicability level of Subpart TT. Therefore, the 3.5 pounds per gallon limit is not applicable. Also, 45 Ill. Adm. Code 218.301 applies and requires each emission

unit to emit less than eight pounds per hour of VOM. 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 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 complies 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 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.