

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary  
Federally Enforceable State Operating Permit (FESOP) Renewal  
Interlake Mecalux  
1600 North 25<sup>th</sup> Avenue, Melrose Park, Illinois

Site Identification No.: 031186AHL  
Application No.: 02080044

Schedule

Public Comment Period Begins: April 2, 2014  
Public Comment Period Closes: May 2, 2014

Illinois EPA Contacts

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## **I. INTRODUCTION**

Interlake Mecalux, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Melrose Park location. 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 renewed permit that it would propose to issue for the plant. However, before renewing 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**

Interlake Mecalux, Inc. is a manufacturer of metal racking systems used in warehouses and large bulk quantity stores. The emission units at this plant that require an operating permit include hydro-soluble painting process, cathaphoresis painting process and solvent cold-cleaning of metal parts. These units are sources of emissions because of the volatile organic material (VOM) emitted to the atmosphere during the painting and cleaning process contained in the raw material used in the processes.

## **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 coating lines are required to meet the requirements of 35 Ill. Adm. Code 218.204(j)(4)(B) or 35 Ill. Adm. Code 218.207 which requires an afterburner to control the VOM emissions. The Board has standards for sources of volatile organic material emissions. The application shows that the plant is in compliance with applicable state and federal emission standards.

#### **V. CONTENTS OF THE PERMIT**

The revised 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, the principle emissions units are hydro-soluble painting process, cataphoresis painting process and solvent cold-cleaning of metal parts subject to 35 Ill. Adm. Code 218.204(j)(4)(B), which requires limit of 2.8 lb/gas of VOM for coatings. 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 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.