

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
L & P Plastics Company, for
Issuance of the Construction Permit for
Paint Booths
Carlyle, Illinois

Site Identification No.: 027030AAW
Application No.: 07020003

Schedule

Public Comment Period Begins: 04/25/2007
Public Comment Period Closes: 05/25/2007

Illinois EPA Contacts

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I. INTRODUCTION

L & P Plastics Company has applied for a construction permit for its Carlyle plant to construct two new paint booths and six modify paint booths unit. The construction of this facility will have the Potential to Emit (PTE) of the single hazardous air pollutant (HAP), toluene over major source threshold level of 10 tons per year thus making this project a major modification for the purposes of Section 112(g) of the Clean Air Act. L & P Acquisition Company has proposed to restrict its production rate at the level which would limit toluene emission to less than 10 tons per year. These limits would prevent the facility from being a major source, avoiding the applicability of the requirements of the Section 112(g). The Illinois EPA has prepared a draft of the construction 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

L & P Plastics Company manufactures plastic parts using an injection molding process beginning with thermoplastic beads. In addition to fabricating the plastic parts, many of them have to be painted. The solvents in the points are volatile organic materials (VOM), some of which are hazardous air pollutants (HAPs).

III. GENERAL DISCUSSION

The limitations established by the construction permit 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 limitations on the operation of a source restrict the potential emissions of the source.

The source has actual emissions which are below the levels at which the plant would be considered a major source under Section 112(g) Clean Air Act. However, in the absence of federally enforceable limitations, the plant 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 undergo Section 112(g) review, as would otherwise be required.

The construction permit limits the operation and annual emissions of the plant to below the major-source-thresholds of 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 standards for sources of Volatile Organic Material (VOM) emission. The application shows that the plant is in compliance with applicable state emission standards.

The principal air contaminant of concern for the facility is VOM from the organic solvents in the paints. The solvents are a vital component of paint which allows the proper application of paint solids through the application equipment to the plastic surface. L & P Plastics Company uses several types of coatings with different amounts of VOM in each gallon. Each type has a usage and VOM content limits which total to less than 100 ton/yr. Cleaning solvent, also a VOM is also limited. Some of the VOMs are HAPs. HAP limits are based on actual emissions.

This permit is issued based on the construction of the two (2) new paint booths and modification of six (6) existing paint booths not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the volatile organic material (VOM), emissions from the above-listed equipment below the levels that would trigger the applicability of these rules.

This permit will be issued based upon the coating operations being subject to 35 Ill. Adm. Code 215.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 215 Subpart K shall apply only to photochemically reactive material.

V. CONTENTS OF THE PERMIT

The construction 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 emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not exceed 0.9 tons/month and 9.0 tons/year of any single HAP and 2.25 tons/month and 22.5 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of Section 112(g) of the Clean Air Act and the NESHAP for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP. 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 minimum control efficiency and the amount of coating used at this facility. 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 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.