

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary
Renewal of their Federally Enforceable State Operating Permit (FESOP)
Metro East Industries, Inc.
Alorton, St Clair County

Site Identification No.: 163005AAE
Application No.: 03090011

Schedule

Public Comment Period Begins: June 26, 2014
Public Comment Period Closes: July 26, 2014

Illinois EPA Contacts

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I. INTRODUCTION

Metro East Industries, Inc. currently operates under federally enforceable state operating permit (FESOP). The company has applied for a renewal of its FESOP. This facility is located at 3200 Missouri Avenue, Alorton, St Clair County, IL. This facility 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 facility. 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

Metro East Industries, Inc. operates a rail car painting operation that coats a variety of railcars and locomotives. The principal air contaminant emitted from the facility is Volatile Organic Material (VOM), generated during the coating application.

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.

This facility has requested to operate under a FESOP because the actual emissions of the facility are below the levels at which the facility would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the facility's potential emissions would be such that the facility would be considered a major source. The permit acts to restrict the facility potential emissions so that it is not considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the facility, 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. Illinois has specific regulations 35 Ill. Adm. Code 219.204(k) specifies the volatile organic material allowed in coating materials for heavy off-highway vehicle products coating; 35 Ill. Adm. Code 219.301, specifies limits of organic material discharge into the atmosphere from any emission source. The application shows that the facility is in compliance with applicable state emission standards.

V. CONTENTS OF THE PERMIT

The FESOP permit that the Illinois EPA is proposing to issue would identify specific emission standards that apply to the emission units at the facility. 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 facility is operated as a non-major source. The permit would limit the operation and annual emissions of the facility 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 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 facility is being operated within the limitations set by the permit and the facility'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 this 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.