

**Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
1021 N. Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506**

Project Summary for an Application from  
Seymour of Sycamore, Inc. for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
917 Crosby Avenue  
Sycamore, Illinois

Site Identification No.: 037055AAG  
Application No.: 72100653

Schedule

Public Comment Period Begins: January 2, 2008  
Public Comment Period Closes: February 1, 2008

Illinois EPA Contacts

Permit Analyst: George Kennedy  
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## **I. INTRODUCTION**

Seymour of Sycamore, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Sycamore, Illinois 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**

Seymour of Sycamore, Inc. is engaged in paint manufacturing activities including preparation of dispersions of paint pre-mix slurries, blending of dispersions with solvents and additives, mixing of blended material, filling of aerosol cans with final paint products, and charging of aerosol cans with propellant. The emission units at this plant that require an operating permit include 16 mixing stations, 4 propellant filling machines, 4 aerosol filling machines, 1 bulk paint filling line, 3 sand mills, 8 high speed mixers and 44 storage tanks. These units are sources of emissions because of the evaporation of solvents and thinners, which are contained within the coating to aid in the application process and for clean-up. Hazardous Air Pollutants (HAPs), specifically toluene, and other volatile organic materials (VOM) are the chief air pollutants released from the manufacturing of spray paint.

## **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 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 application shows that the plant is in compliance with applicable state emission standards.

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

The renewed 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 above listed units are subject to 35 Ill. Adm. Code 215, which requires including VOM emissions from clean-up operations included in limits toward becoming major, loading operations equipment requirements, and limiting discharge of VOM. 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.

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.