

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
CraftMaster Manufacturing, Inc. for Renewal of its Federally Enforceable
State Operating Permit (FESOP) for
Wood Door Manufacturing
Plainfield, Illinois

Site Identification No.: 197815AAH
Permit Application No.: 73100116

Schedule

Public Comment Period Begins: July 20, 2012
Public Comment Period Closes: August 19, 2012

Illinois EPA Contacts

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I. INTRODUCTION

CraftMaster Manufacturing, Inc., This facility has applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for its Plainfield door manufacturing operation. This facility is located at 1411 North Van Dyke Road, Plainfield, Will County. This facility requires an air pollution control operating permit because it is a source of air emissions. The Illinois EPA has prepared a draft of the 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

CraftMaster Manufacturing, Inc. manufactures wood door from machined wood, then coats the doors with various varnishes and coating. This operation causes this facility to a source of Volatile Organic Material (VOM) and Hazardous Air Pollutants (HAPs).

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 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 facility, as would otherwise be required.

The FESOP limits the operation and annual emissions of the facility to below the major-source-thresholds of 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

This FESOP permit further limits the potential emissions of VOM from the source to less than 25 tons/year and establishes federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System, and the requirements of 35 Ill. Adm. Code 218.204(l) (Wood Furniture Coating). This permit also address as well the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, 40 CFR 63 Subpart DDDD, and the National Emission Standards for Hazardous Air

Pollutants (NESHAP) for Surface Coating of Wood Building Products, 40 CFR 63 Subpart QQQQ.

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 Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), Volatile Organic Material, Particulate Matter (PM₁₀), and Carbon Monoxide (CO) emission. The application shows that the facility is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The FESOP permit that the Illinois EPA is proposing to issue will 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 and the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System of 25 tons per year for VOM, and 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 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 the permit renewal. 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.