

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary
Renewal of their Federally Enforceable State Operating Permit (FESOP)
Daubert Cromwell, LLC
Alsip, Cook County, 60803

Site Identification No.: 031003ADP
Application No.: 02040026

Schedule

Public Comment Period Begins: February 20, 2014

Public Comment Period Closes: March 22, 2014

Illinois EPA Contacts

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I. INTRODUCTION

Daubert Cromwell, LLC has applied for a Federally Enforceable State Operating Permit (FESOP) renewal for its Alsip, 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 revised 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

Daubert Cromwell, LLC manufactures corrosion preventive products. It produces varieties of grades of papers for rust prevention and barrier packaging that protect against moisture, grease, and heavy duty environmental conditions. The emission units at this plant that require an operating permit include: Corrosion inhibitor coating and printing lines, wax coating lines and waxing mixing tanks. These units are sources of emissions because of the Volatile Organic Material (VOM) emissions from the corrosion inhibitor coating to the atmosphere.

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 will operate 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.

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 specific standards for VOM (35 Ill. Adm. Code 218). The application shows

that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would identify the specific emission standards that apply to the emission units at the plant. 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 will limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM.

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 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 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.