

Project Summary - Cerro Flow Products LLC - Sauget

I. Introduction

An application has been submitted by Cerro Flow Products in order to incorporate federally enforceable limits for modifications to their tube cleaning system at their facility in Sauget, Illinois. These limits would prevent the modifications from being major as defined by NSR. The proposed limits would be accompanied by recordkeeping and reporting requirements to ensure that the modifications are operated as a non-major modification. These conditions would be enforceable by both the State of Illinois and the U.S. Environmental Protection Agency.

II. Source Description

Cerro Flow Products manufactures copper tubing. This permitting action addresses modifications to the new system to clean or degrease copper tubing prior to shipping. The new system performs both liquid and vapor degreasing, in sequence, on loads of tubing while they are contained within a sealed processing vessel that operates at less than atmospheric pressure. This design minimizes emissions of the organic solvent used in the degreasing process.

Cerro Flow Products has requested a construction permit revision to establish higher limits for VOM emissions from the new tube cleaning system, addressing actual emission data from the system that indicates potential exceedances of the limits set in the original permit issued in December 2008. Unlike that permit, this revised permit relies on an evaluation of the net change in VOM emissions from this project, considering the decrease in VOM emissions from the elimination of the existing dip tank cleaning system.

III. Emissions

The primary air contaminants emitted from the tube cleaning system is Volatile Organic Material, VOM, from the degreasing solvent. Total facility VOM emissions will increase by 36.2 tons/year.

IV. Applicable Emission Standards

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for sources of NO_x, SO₂, CO, VOM, and PM. The modification to tube cleaning system complies with all applicable Board standards.

V. Proposed Permit

The conditions of the proposed permit contain limitations and requirements to ensure that this project will be operated as a non-major modification. The permit conditions also establish appropriate compliance procedures, including recordkeeping and reporting requirements. The Permittee must carry out these procedures on an on-

going basis to demonstrate that the facility is operating within the limitations set by the permit and are properly controlling emissions.

VI. Request for Comments

It is the Illinois EPA's preliminary determination that the above noted modifications to this Source meet all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this operation. 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 Ill. Adm. Code Part 166.

KS:ks