

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR
PERMIT SECTION

August 18, 2011

Responses to Comments on the
Draft CAAPP Operating Permit for
Icon Identity Solutions
for a miscellaneous metal parts coating plant
in Elk Grove Village, Illinois

Source Identification No.: 031440AKK
Application No.: 98080019

BACKGROUND

On May 22, 2009 the Illinois EPA, Bureau of Air received a CAAPP operating permit renewal application from Icon Identity Solutions, for its Clean Air Act Permit Program (CAAPP) permit for an existing miscellaneous metal parts coating plant in Elk Grove Village, Illinois.

The Illinois EPA has completed a public comment period on the draft of a renewed CAAPP permit. Comments from USEPA-Region 5 on this draft have been received August 10, 2011. The Illinois EPA has prepared this document, which addresses significant comments to accompany the submittal of proposed CAAPP permit for 45-day USEPA review.

COMMENTS WITH RESPONSES

Comments from USEPA

1. There is an inconsistency in the record retention time between conditions 3.5(c)(ii) and 2.5(b). Since Condition 2.5(b) is the more stringent requirement, please subsume the record retention requirements of 35 Illinois Administrative Code 254.134 in Condition 3.5(c)(ii) into the requirements of 39.5(7) of the Illinois Environmental Protection Act (Act) listed in Condition 2.5(b).

Response:

The Illinois EPA agrees with the nature of this comment and Condition 3.5(c)(ii) was deleted. All records at the source shall be kept in accordance with Condition 2.5(b).

2. 39.5(7) of the Act requires the CAAPP to include all applicable requirements. This permit does not appear to include all of the requirements from construction permit 97120020, in particular usage limits and work practice requirements. Please include all requirements from identifying construction permits or explain why these requirements are no longer applicable.

Response:

The Illinois EPA agrees with the nature of this comment. All production/emission limits and work practices from CP 97120020 have been reinstated.

3. The origin and authority for condition 4.2(d)(ii)(B) should be 39.5(7)(b) not 39.5(7)(a) as listed.

Response:

Reference to 39.5(7)(b) was made in Condition 4.1(2)(d)(ii)(B).

4. The natural gas usage records required by 4.2(d)(ii)(B) should be monthly records rather than annual records in order to comply with requirement to demonstrate compliance with annual limits in 4.2(d)(i)(E) using a running total of 12 months of data.

Response:

The Illinois EPA agrees with the nature of this comment. Monthly recordkeeping requirements for natural gas usage have been established in Condition 4.1(2)(d)(ii)(B).

FOR ADDITIONAL INFORMATION

Questions about the public comment period and permit decision should be directed to:

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