

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Parenti & Raffaelli, Ltd. for a
Federally Enforceable State Operating Permit (FESOP) for
215 East Prospect Avenue
Mount Prospect, Illinois 60056

Site Identification No.: 031198ABT
Application No.: 95120141

Illinois EPA Contacts

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I. INTRODUCTION

Parenti & Raffaelli, Ltd. has applied for a Federally Enforceable State Operating Permit (FESOP) for its plastic bag and film manufacturing facility at 4848 South Hoyne Avenue in Chicago. 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 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

The Parenti & Raffaelli facility operates Architectural Woodworking Coating lines for the application of surface coatings to the woodwork of different finishing appearances based on a customer's order and design specifications. All coating operations are performed in the Wood Finishing Room. The emission units include three Paint Spray Booths (SB-1, SB-2, and SB-3) for the application of sprayable paint coatings to the woodwork surfaces using manual airless and conventional spray applicators, a Drying Room for the low temperature paint dry-off, and a Paint Storage Vault for the storage of paint and solvent products. The wood finishing room also includes the application of paint coatings to the woodwork surfaces using paint brushes and rollers, the Miscellaneous Paint Mixing and Thinning Operations for the preparation of paint formula, and the Miscellaneous Paint Stripping and Solvent Cleaning Operations for paint stripping and equipment cleaning activities.

All coating lines are operated in batch mode and each coating line can be applied in either SB-1, SB-2, or SB-3. All coating lines either use the drying room for paint dry-off or the wood finishing room for air drying. When multiple coatings are required for specific woodwork jobs, each coating is applied and dried before subsequent coatings are applied and dried in different coating lines. At the woodworking shop various sawing, cutting and sanding machines are controlled by a cyclone and baghouse.

The coatings, glue and solvents contain organic solvents which are emitted to the atmosphere during the coating process and glue application as volatile organic material.

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 applied for 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 not 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 Board has specific standards for units emitting volatile organic material in the greater Chicago Area. These standards put limitations on the amount of VOM in each coating. All topcoat coatings are allowed 0.8 pounds of VOM per pound of coating solids. Opaque stain coatings are allowed 4.7 pounds of VOM in each gallon of coating. Semi-transparent stain coatings are allowed 4.7 pounds of VOM in each gallon of coating and there are other limitations for additional wood furniture coatings found at 35 Ill. Adm. Code 218.204L.

V. Contents of the Permit

This permit that the Illinois EPA is proposing, will 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 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. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

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 issuance 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.

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