

## Project Summary

### I. INTRODUCTION

This source has applied for a revision to its Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Plastic Decorators Inc. is located at 1330 Holmes Road in Elgin. The source molds, paints, prints, and laser etches small plastic parts primarily for the automotive industry. These parts are typically used as switches, knobs, and dial faces, which are sold chiefly to automotive customers for assembly into finished automobiles.

A CAAPP Permit was previously issued for this source. This significant modification to that CAAPP Permit changes the compliance method for Group III spray booth emission limits from a running daily total to a running monthly total. The new compliance method matches the current method for Group I and Group II spray booths. There is no change in emission limits as a result of this permit revision.

### II. EMISSION UNITS

Significant emission units at this source are as follows:

| Emission Unit | Description   | Date Constructed | Emission Control Equipment |
|---------------|---|------------------|----------------------------|
| 1             | Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #1)         | December, 1992   | None                       |
| 2             | Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #2)         | August, 1984     | None                       |
| 4             | Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #4)         | August, 1984     | None                       |
| 5             | Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #5)         | August, 1984     | None                       |
| 6             | Metal Tech/Binks Manual Spray Booth (Manual Spray Booth #6)         | August, 1984     | None                       |
| 10            | Metal Tech/Binks Spray Booth Serial No. 34108 (Spray Booth 60)      | December, 1992   | None                       |
| 20            | Metal Tech/Binks Spray Booth Serial No. 495309691 (Spray Booth 220) | September, 1996  | None                       |

|    |  |                 |      |
|----|--|-----------------|------|
| 21 | Metal Tech/Binks Spray Booth Serial No. 495309692 (Spray Booth 220)  | September, 1996 | None |
| 22 | Metal Tech/Binks Spray Booth Serial No. M1 (Spray Booth 220)         | April, 1994     | None |
| 23 | Metal Tech/Binks Spray Booth Serial No. 693297792 (Spray Booth 220)  | May, 1993       | None |
| 24 | Metal Tech/Binks Spray Booth Serial No. 1292294261 (Spray Booth 220) | May, 1993       | None |
| 25 | Thierica Mfg. Spray Booth (New Spray Booth 25)                       | March, 2001     | None |

| Emission Unit | Description  | Date Constructed | Emission Control Equipment |
|---------------|--|------------------|----------------------------|
| 27            | Metal Tech/Binks Spray Booth Serial No. 49228740 (Spray Booth B/G 204) | October, 1992    | None                       |
| 28            | Metal Tech/Binks Spray Booth Serial No. 59027356 (Spray Booth B/G 168) | June, 1989       | None                       |
| 29            | Metal Tech/Binks Spray Booth Serial No. 59027357 (Spray Booth 220)     | April, 1994      | None                       |

### III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

#### Permitted Emissions of Regulated Pollutants

| Pollutant                          | Tons/Year |
|------------------------------------|-----------|
| Nitrogen Oxides (NO <sub>x</sub> ) | --        |
| Particulate Matter (PM)            | --        |
| Sulfur Dioxide (SO <sub>2</sub> )  | --        |
| Volatile Organic Material (VOM)    | 143.8     |
| HAP, not included in VOM or PM     | --        |
| Total                              | 143.8     |

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

### 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.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

## V. PROPOSED PERMIT

### CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

### Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions.

## VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore

proposing to issue a CAAPP permit, subject to the conditions proposed in the draft 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 Ill. Adm. Code Part 166.

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