

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Tru Vue, Inc. for a  
Federally Enforceable State Operating Permit (FESOP) for  
9400 West 55th Street  
McCook, Illinois 60525

Site Identification No.: 031174ACI  
Application No.: 05080045

Illinois EPA Contacts

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**I. INTRODUCTION**

Tru Vue, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its Coating Plant at 9400 West 55<sup>th</sup> Street in McCook, Illinois. 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**

Tru Vue, Inc, operates two glass coating lines at its facility. In the past, Tru Vue has purchased glass coating from a third party. However, Tru Vue, Inc. now manufactures its own coatings. As part of adding the new coating manufacturing process, Tru Vue removed the old glass coating.

Tru Vue has collected data to calculate the emissions from the coating manufacturing process. The coating is made in 300 pound batches. The weights of the materials that go into the coating are weighed and then the coating is weighted again after manufacturing. The difference in weight is assumed to be 100 percent methanol since methanol is a byproduct of the reaction which creates the coating. In actuality, the losses will be a combination of methanol and water, but the losses are assumed to be 100 percent methanol for the calculations.

Based on the data, approximately 4.885 pounds of methanol will be lost for every batch. TO be conservative, Tru Vue is assuming that the amount of methanol that is lost is 8 pounds per 300 pound batch which equates to 2.67 percent. In addition to the emissions from the coating process, there will be some additional cleaning that will be needed.

The principal air contaminant emitted from the facility is volatile organic material, generated during coating application, coating manufacturing and clean-up operations. The natural gas combustion generated predominantly nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO).

**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. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

**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 would also set limitations on the amount of coatings and manufactured used in order to limit emissions. The Permit requires the Permittee to keep records of the coating and vanishing oil usage. With the records the Permittee maintains the Illinois EPA can verify compliance with Permit conditions and calculate the Plants air emissions. These limitations are consistent with the historical operation of emission units at the plant.

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 issuance of its permit. The Illinois EPA is therefore proposing to renew 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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