

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
1021 N. Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506

Project Summary for an Application from  
Sandstrom Products Company for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
Paint Manufacturing Plant  
Port Byron, Illinois

Site Identification No.: 161055AAA  
Application No.: 73020542

Schedule

Public Comment Period Begins: October 13, 2008  
Public Comment Period Closes: November 12, 2008

Illinois EPA Contacts

Permit Analyst: Jocelyn Stakely  
Community Relations Coordinator: Brad Frost

## **I. INTRODUCTION**

Sandstrom Products Company has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for their paint manufacturing facility. 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 renewed permit that it would propose to issue for the plant. However, before renewing 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**

Sandstrom Products Company manufactures paint, adhesive products, lubricants, and latex emulsions products. The products are available for commercial and industrial uses. Raw material (additives, pigments, resins and solvents) are processed through mixing and milling equipment. The company operates 23 mixing tanks, 10 mills, 10 mixers, five mineral spirits storage tanks, one xylene storage tank, two glycol ether storage tanks, and a ribbon mixer. The manufacturing operations are primarily a source of volatile organic material (VOM) emissions, particulate matter (PM) emissions, and hazardous air pollutant (HAP) emissions. The tanks emit VOM emissions. HAP and VOM emissions are uncontrolled.

## **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 been operating this plant under 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 to 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, 100 tons for PM, 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 standards for sources of Volatile

Organic Material (VOM), and Particulate Matter (PM) emission. The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern is volatile organic material (VOM) which is generated during solvent handling/usage throughout the paint mixing process. The secondary air contaminant emitted during paint production is particulate matter (PM), which is released during the dry pigment mixing and handling. The facility has limited their throughput that will keep the PM and VOM emissions below the major source threshold level of 100 tons per year for PM and 100 tons per year for VOM.

Other emissions of hazardous air pollutants (HAP) are also emitted; however, their levels are also depended on the amount of VOM and will remain below the major source threshold level of 10 ton per year for single HAP and 25 ton per year for combined total HAPs.

## **V. CONTENTS OF THE PERMIT**

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant.

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, 100 tons for PM, 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 requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on Paint Manufacturing Plant emissions. These limitations are consistent with the historical operation and capacity of the facility.

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 renewal 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.