

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Formel Industries, Inc.. for the
Federally Enforceable State Operating Permit (FESOP) for
2355 North 25th Avenue and 11323 West Franklin Avenue,
Franklin Park, Cook County

Site Identification No.: 031096AMM
Application No.: 05030054

Schedule

Public Comment Period Begins: June 26, 2014
Public Comment Period Closes: July 26, 2014

Illinois EPA Contacts

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I. INTRODUCTION

Formel Industries, Inc. currently operates under federally enforceable state operating permit (FESOP) which has expired. The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). 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 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

Formel Industries, Inc. is packaging products printing plant. The emission units at this plant that require an operating permit include three flexographic and one rotogravure printing presses. Both groups of printing presses are controlled by catalytic afterburners. These units are sources of emissions because the printing inks and cleaning solutions contain organic solvents, which are emitted to the atmosphere during the printing process as volatile organic material (VOM). The solvents also contain components that are considered hazardous air pollutants (HAPs)).

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 and Title I of the Clean Air Act and regulations promulgated thereunder, including 35 IAC Part 203 - Major Stationary Sources Construction and Modification. 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 for both programs. 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 federally enforceable limitations of the annual potential VOM emissions also allow the source to avoid participation in the Emissions Reduction Market System (ERMS).

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 tons.

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, e.g., 35 IAC, Part 218, Subpart H – Printing and Publishing. The source is subject to the requirements of this subpart pursuant to provision of 35 Ill. Adm. Code 218.401(c).

The source potentially could be subject to the 40 CFR 63, Subpart KK— National Emission Standards for the Printing and Publishing Industry. The source is exempted from the requirements of this subpart due to FESOP limitations of the potential emissions of HAPs to below major source threshold level.

The rotogravure printing press potentially could be subject to the New Source Performance Standards (NSPS) for Publication Rotogravure Printing, 40 CFR Part 60, Subpart QQ. The source is exempted from the requirements of this subpart because the affected press does not meet the definition of a publication rotogravure printer.

Pursuant to 35 Ill. Adm. Code 218.402(c) the source is exempt from complying with general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

The revised 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. As explained, the printing presses are subject to 35 IAC 218.401 control requirements, which restricts VOM content of the inks and coatings applied at the printing presses or require certain degree of control to decrease VOM emissions. 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 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.