

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Duraco, Inc. for the Revision of  
Federally Enforceable State Operating Permit (FESOP) for  
7400 West Industrial Drive  
Forest Park, Illinois

Site Identification No.: 031090ACF  
Application No.: 03120015

Schedule

Public Comment Period Begins: March 13, 2013  
Public Comment Period Closes: April 12, 2013

Illinois EPA Contacts

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## **I. INTRODUCTION**

Duraco, Inc. currently operates under federally enforceable state operating permit (FESOP). The company has applied for a revision of its FESOP to incorporate two new coating/laminating lines from construction permit 12110014. This addition to company's operations triggered applicability of Emission Reduction Market System and required to incorporate in the FESOP appropriate restrictions on their operations 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**

Duraco, Inc. is a pressure sensitive tape manufacturer. The adhesives are applied to the rolls of paper or plastic film. After coating rolls are cut in tapes. The coating equipment is periodically cleaned with a solvent. These units are sources of emissions because the adhesives and cleaning materials contain organic solvents, which are emitted to the atmosphere as volatile organic material (VOM). The solvents also contain components that are considered hazardous air pollutants (HAPs). The natural gas combustion generates the whole spectrum of pollutants predominantly represented by 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 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 Clean Air Act and regulations promulgated thereunder. 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 this program. 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, 10 tons for an individual HAP and 25 tons for combined HAPs tons and ozone seasonal VOM emission below 15 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 E – Solvent Cleaning, Subpart F - Coating Operations.

The pressure sensitive tape manufacturing is the subject to the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR which imposes limitations on the VOM content of the coatings and the use of a control device to reduce VOM emissions.

National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR 63 Subpart OOOOOO. To comply with requirements of Subpart OOOOOO the company shall not use Methylene Chloride in their operations.

Pursuant to 35 Ill. Adm. Code 218.209 paper coating operations are 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 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. As explained, the non-coating equipment cleaning operations are subject to 35 IAC 218.187 control requirements, which restricts VOM content of cleaning solutions. The paper coating operations are subject to 35 IAC 218.204(c) which requires limitations on the VOM content of the coatings and the use of a control device to reduce VOM emissions. These limitations are identical to those found in 40 CFR 60, Subpart RR.

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.