

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
1021 North Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506  
217/782-2113

Project Summary for Proposed Issuance of a  
Renewal Federally Enforceable State Operating Permit for  
Mikron Industries Inc., d/b/a Mikron Midwest's  
Vinyl Window and Door Frame Extrusion Operation in  
Winnebago, Illinois

Site Identification No.: 201050AAL  
Application No.: 03030093

Illinois EPA Contacts:

Permit Analyst: German Barria  
Community Relations Coordinator: Brad Frost

Important Dates:

Application Received: March 9, 2011  
Comment Period Begins: July 15, 2011  
Comment Period Closes: August 14, 2011

## PROJECT SUMMARY

### I. INTRODUCTION

Mikron Industries Inc., d/b/a Mikron Midwest ("Mikron") has applied for a renewal of their Federally Enforceable State Operating Permit (FESOP) for its vinyl window and door frame extrusion operation in Winnebago. This plant requires an air pollution control operating permit because it is a source of emission. The Illinois EPA has prepared a draft of the FESOP that it would propose to issue for the plant. However, before issuing the FESOP, 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.

### II. SOURCE DESCRIPTION

Mikron manufactures window and door profiles that are shipped to fabricators who assemble vinyl window and door frames. Mikron uses granular PVC as a raw material which is melted in a heated extruder and forced through a die to create profiles need to assemble window and door frames. The emission units at this plant that require an operating permit include a lamination operation, cleaning operations, grinding/pulverizing operations and material handling operations. These units are sources of emissions because the coatings and cleaning solutions contain organic solvents (and/or HAP), which are emitted to the atmosphere during the laminating and cleaning process.

### III. GENERAL DISCUSSION

FESOPs are federally enforceable, that is, the terms and conditions of FESOPs can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. FESOPs can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

Mikron's 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 FESOP acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, Mikron need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP 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. Emissions of other pollutants, e.g., (volatile organic material, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide) from the plant have potential emissions which are small enough that no additional restrictions are necessary to avoid being a major source of these pollutants.

#### **IV. APPLICABLE EMISSION STANDARDS**

All emission units 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. The Board has specific standards for sources of volatile organic material in the greater Chicago area. The conditions of this permit are intended to ensure that the source will comply with all applicable Board standards.

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

The FESOP conditions identify specific rules and regulations applicable to the emission units at the plant. In particular, the laminator and extruder cleaning operation are subject to 35 IAC 215.301, which limits emissions to less than 8 pounds per hour of organic material.

The FESOP would also contain limitations and requirements to assure that this plant is operated as a non-major source. The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 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 sets limitations on the amount of HAP used at this plant. These limitations are consistent with the historical operation and capacity of the plant.

The permit conditions also establish 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 a FESOP. The Illinois EPA is therefore proposing to issue the FESOP.

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.