

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
Hartford Working Group c/o Clayton Group Services for a
Federally Enforceable State Operating Permit (FESOP) for
201 East Hawthorne
Hartford, Illinois 62048

Site Identification No.: 119050AAS
Application No.: 06050038

Schedule

Public Comment Period Begins: January 24, 2008
Public Comment Period Closes: February 23, 2008

Illinois EPA Contacts

Permit Analyst: George Kennedy
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Hartford Working Group has applied for a Federally Enforceable State Operating Permit (FESOP) for its Hartford, Illinois location. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of this 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

Hartford Working Group is operating a remediation vacuum extraction system. The emission units at this plant that require an operating permit include four vacuum extraction systems including vacuum blowers, thermal oxidizers and two condensate tanks. These units are sources of emissions because the vacuum extraction systems extract volatile organic material (VOM) from the earth, run this material through a thermal oxidizer for control, and then emitted to the atmosphere during the extraction process.

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 will be 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 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. 35 Ill. Adm. Code 219 Subpart TT requires emission capture and control

equipment which achieve overall reduction in uncontrolled VOM emission of a least 81 percent from each emission unit. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would identify the specific emission standards that apply to the emission units at the plant. As explained, the vacuum extraction systems are subject to 35 Ill. Adm. Code 219 Subpart TT, which requires overall 81 percent of reduction of VOM. The conditions of this permit are intended to ensure that the source complies 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.

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.

GMK:06050038:psj