

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Great Dane Limited Partnership/Great Dane Trailers
Federally Enforceable State Operating Permit (FESOP)
2006 Kentville Road
Kewanee, Illinois 61443

Site Identification No.: 073813AAG
Application No.: 02030082

Illinois EPA Contacts

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I. INTRODUCTION

Great Dane Limited Partnership / Great Dane Trailers has applied for a Federally Enforceable State Operating Permit (FESOP) renewal for its Semi Truck Trailer Coating plant located at 2006 Kentville Road in Kewanee. 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 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

Great Dane Trailers manufactures semi truck trailers. The emission units at this plant that require an operating permit include seven liquid paint spray booths, natural gas fuel combustion, and a diesel storage tank. These units are sources of emissions because the coatings contain organic solvents, which are emitted to the atmosphere during the painting process as volatile organic material (VOM). These materials 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 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 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. The potential emissions of other pollutants (e.g., nitrogen oxides, carbon monoxide, sulfur dioxide, etc.) from the plant are small enough that no restrictions are needed to avoid being a major source of these pollutants.

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. In addition, this plant would be subject to the new federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart M in the absence of a FESOP to limit the HAP emissions to below major source thresholds. This new rule would require the Great Dane to add new air pollution control equipment and would increase the required testing, monitoring, recordkeeping, and reporting the plant would have to perform. Without the limits in the FESOP, the plant, which operates as a minor source, would be treated as a major source. The application shows that the plant is in compliance with applicable state and federal emission standards that are applicable to minor sources.

V. CONTENTS OF THE PERMIT

The 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 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 would also set limitations on the amount and type of coatings and solvents and the amount of VOM contained in materials used at this plant. These limitations are consistent with the historical operation of emission units at the plant.

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 being controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for its permit. The Illinois EPA is therefore proposing to issue 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.