

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Rockford Silk Screen Process, Inc. for a  
Federally Enforceable State Operating Permit (FESOP) for  
6201 Material Avenue  
Rockford, Illinois 61110

Site Identification No.: 201030AZE  
Application No.: 07080050

Schedule

Public Comment Period Begins: February 17, 2009  
Public Comment Period Closes: March 19, 2009

Illinois EPA Contacts

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**I. INTRODUCTION**

Rockford Silk Screen Process, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its screen printing facility at 6201 Material Avenue in Rockford. 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**

Rockford Silk Screen Process, Inc., located in Rockford, Illinois, specializes in high-quality screen printing. Rockford Silk Screen Process, Inc. utilizes inks cured with ultra-violet light rather than conventional solvent based inks.

A major limitation on production at the facility is the limited amount of space available for drying the substrate, allowing for a maximum of 11,000 ft<sup>2</sup> of substrate to be dried in an hour.

Rockford Silk Screen Process, Inc. recently acquired two hand presses such that their potential to emit increased above major source thresholds while their actual emissions remained the same. As a result, the source seeks a Federally Enforceable State Operating Permit (FESOP).

The emissions of volatile organic material (VOM) result from the use of ink and solvents. These materials contain organic solvents which are emitted to the atmosphere during their use.

**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 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.

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

**V. CONTENTS OF THE PERMIT**

This permit that the Illinois EPA is proposing to issue will identify the specific emission standards that apply to the emission units at the plant. As explained, the principal emission units, the silk screen presses are subject to 35 Ill. Adm. Code 215.301. This regulation requires each emission unit shall not emit more than 8 pounds per hour of organic material. 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 issuance of 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.

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