

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Springfield, Illinois 62794-9506

Project Summary for an Application from  
Illinois Tool Works - Fastex  
for Issuance of the  
Federally Enforceable State Operating Permit (FESOP) for  
195 Algonquin Road,  
Des Plaines, Cook County

Site Identification No.: 031063AAD  
Application No.: 02070077

Schedule

Public Comment Period Begins: October 16, 2012  
Public Comment Period Closes: November 15, 2012

Illinois EPA Contacts

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## **I. INTRODUCTION**

Illinois Tool Works - Fastex currently operates under federally enforceable state operating permit (FESOP) which was issued more than five years ago. The company requested a renewal of their FESOP 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**

Illinois Tool Works performs metal parts stamping and plastic parts molding operations. Between operations the metal parts are cleaned with organic solvents.

## **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 operate 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 operate under 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 of volatile organic material (VOM).

## **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 emissions of particulate matter (PM) from process and fugitive sources, e.g., 35 IAC, Part 212, Subpart B – Visible Emissions, Subpart K – Fugitive Particulate Matter and Subpart L – PM Emissions from Process Emission Units. Emission units emitting VOM are

regulated by Part 218, e.g., emissions from metal parts stamping and plastic parts molding operations is regulated by Subpart TT – Other Emission Units. Solvent cleaning operations are regulated by Subpart E. The sources of VOM emissions are also subject to 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 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. The process emission units shall not exhibit emission of particulate matter exceeding 30% and fugitive emissions shall not cross property line as specified in Part 212, Subpart B and Subpart K. As explained, metal parts stamping and plastic parts molding operations are subject to Subpart TT and emission limitations of 35 IAC 218.301 which requires limiting VOM emissions from each emission unit to less than 8 lbs per hour. 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 per year of VOM and 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.

ECB:VJB: