

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  
Easton Bell Sports for a  
Federally Enforceable State Operating Permit (FESOP) for  
1001 Innovation Road  
Rantoul, Illinois 61866

Site Identification No.: 019065ABX  
Application No.: 13030014

Illinois EPA Contacts  
Permit Analyst: David Hulskotter  
Community Relations Coordinator: Brad Frost

**I. INTRODUCTION**

Easton Bell Sports has applied for a Federally Enforceable State Operating Permit (FESOP) for its sporting goods manufacturing plant at 1001 Innovation Road in Rantoul. 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**

Bell Sports located in Rantoul, Champaign County has applied for a new operating permit for a new facility. The facility manufactures sporting and athletic goods, and is covered under Standard Industrial Classification (SIC) Code 3949. Bell Sports' operations include the following emissions units: two sporting helmets coating operations. These coating operations consist of coating spray booths, ovens and panel filters. The coating of the helmets would be classified as plastic part coating.

The coatings and glue contain organic solvents which are emitted to the atmosphere during the coating process and during application of the glue as volatile organic material (VOM).

**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 applied for 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. In general coating operations are subject to 35 Ill. Adm. Code 215.204 Coating Regulations for Manufacturing Plants. However, this regulation does not restrict plastic parts coating and this is what is performed at this facility. This facility would then be subject to 35 Ill. Adm. Code 215.301 which requires that no emission unit at the facility can emit more than eight pounds per hour of organic material to the atmosphere. 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, will 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 of organic solvent usage for the coating operation in order to limit emissions. The Permit requires the Permittee to keep records of the materials used that contain VOM and HAP. With the records the Permittee maintains the Illinois EPA can verify compliance with Permit conditions and calculate the Plants air emissions. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also 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.