

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  
Surface Guard, Inc., for the Renewal of  
Federally Enforceable State Operating Permit (FESOP) for  
515 North Enterprise Street, Aurora, Illinois

Site Identification No.: 043407AAI  
Application No.: 05040029

Schedule

Public Comment Period Begins: August 20, 2014  
Public Comment Period Closes: September 19, 2014

Illinois EPA Contacts

Permit Analyst: Valeriy Brodsky  
Community Relations Coordinator: Brad Frost  
217/782-7027  
[Brad.frost@illinois.gov](mailto:Brad.frost@illinois.gov)

## **I. INTRODUCTION**

Surface Guard, Inc. currently operates under federally enforceable state operating permit (FESOP) which expired . 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). Production and emission limitations, as well as monitoring and recordkeeping conditions contained in the FESOP have prevented the facility from being a major source and will assure this status in the future. These conditions would be enforceable by both the State of Illinois and USEPA.

## **II. SOURCE DESCRIPTION**

Surface Guard, Inc. manufactures protective paper and polyethylene masking tape. The emission units at this plant that require an operating permit include five paper and film adhesive coating lines and one flexographic printing line. These units are sources of emissions because the adhesives, printing inks and cleaning solutions contain organic solvents, which are emitted to the atmosphere during the coating and printing process as volatile organic material (VOM). These solvent 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 needs to 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 and Title I of the Clean Air Act and regulations promulgated thereunder, including 35 IAC Part 203 - Major Stationary Sources Construction and Modification. 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 for both programs. 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, e.g., 35 IAC, Part 218, Subpart F – Coating Operations. The paper and film coating lines are subject to the requirements of this standard.

The flexographic printing press potentially could be subject to 35 IAC, Part 218, Subpart H – Printing and Publishing. The source is exempted from the requirements of this subpart due to FESOP limitations of the potential VOM emission to the below subpart applicability level.

The source potentially could be subject to the 40 CFR 60, Subpart RR— New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations. The source is exempted from the control requirements of this subpart due to actual VOM usage being less than applicability threshold level of 50 tons per year.

The source potentially could be subject to the 40 CFR 63, Subpart KK— National Emission Standards for the Printing and Publishing Industry. The source is exempted from the requirements of this subpart due to FESOP limitations of the potential emissions of HAPs to below major source threshold level.

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

#### **V. CONTENTS OF THE PERMIT**

The renewed 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 paper coating operations are subject to 35 IAC 218, Subpart F which restricts VOM content of the coatings to daily-weighted average of 2.3 pounds per gallon of coating. 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. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

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 renewal 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.