

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
Sterling Multi Products, Inc. for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
326 West 5th Street
Prophetstown, Illinois 61277

Site Identification No.: 195040AAH
Application No.: 73110085

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Sterling Multi Products, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its coating facility at 326 West 5th Street in Prophetstown, Illinois. 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 renewing 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

Solvent degreasing (or solvent cleaning) is the physical process of using organic solvents to remove grease, fats, oils, wax or oil from various metal, glass or plastic items. Open top vapor degreasers are batch loaded boiling degreasers that clean with condensation of hot solvent vapor on colder metal parts. Sterling Multi Products has an open top vapor degreaser that uses halogenated HAP solvent liquid (trichloroethylene) or vapor to remove soils from the surfaces of materials.

The principal air contaminant of concern for this plant is a hazardous air pollutant (HAP) which is generated during solvent cleaning and drying of parts.

The proposed permit limits the potential annual emissions of hazardous air pollutants from the operation to less than 10 tons per year.

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. The vapor degreaser is subject to a National Emission Standard for Hazardous Air Pollutants, 40 CFR Part 63, Subpart T National Emission Standards for Halogenated Solvent Cleaning. These standards require certain equipment requirements, control requirements and operation requirements to be met. 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, 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 degreaser solvent. 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 that 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.

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