

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

**BUREAU OF AIR**

**DIVISION of AIR POLLUTION CONTROL**

**PERMIT SECTION**

PROJECT SUMMARY for the  
PROPOSED TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Signode

7701 West 71<sup>st</sup> Street  
Bridgeview, Cook County, Illinois, 60455

Permit Engineer/Technical Contact: Anatoly Belogorsky, 217/782-2113

Community Relations/Comments Contact: Brad Frost, 217/782-7027

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Springfield, Illinois

## I. INTRODUCTION

This source has applied for a renewal of the Title V - Clean Air Act Permit Program (CAAPP) operating permit (I.D. 031027AAG, Permit # 95090018) for its existing operation. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by the federal Clean Air Act, as amended in 1990, and 40 CFR Part 70. Unlike state operating permits, the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A Title V permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

## II. KEY ELEMENTS OF THE PROPOSED PERMIT

This Title V permit is divided into several sections and the following are the important segments that maybe of interest to the general public:

- a. Introduction
- b. List of abbreviations and acronyms commonly used
- c. Insignificant activities (Section 3)
- d. Significant emission units operated at the source (Section 4)
- e. Overall source conditions (Section 5)
- f. Conditions for emissions trading programs (Section 6)
- g. Conditions for specific significant emission units (Section 7)
- h. General permit conditions (Section 8)
- i. Standard permit conditions (Section 9)
- j. Attachments (Section 10)

## III. SOURCE DESCRIPTION INFORMATION

- a. Location and nature of business

Signode is located at 7701 West 71st Street in Bridgeview. The source produces steel strapping. During production, steel is cold rolled, slit, cleaned and heat treated, painted, and coiled. In addition to steel strapping, the source produces steel seals used for clamping the strap ends together.

b. National Ambient Air Quality Standard status for this area

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment), PM<sub>10</sub>, and PM<sub>2.5</sub> and attainment or unclassifiable for all other criteria pollutants of the National Ambient Air Quality Standards.

c. Major source status

This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

d. Significant emission units

Emission Unit(s)	Description	Unit Designation	Date of Construction	Emission Control Equipment
Fuel Combustion Emission Units	Space Heater #1	H-1	3/98	None
	Natural Gas-Fired Boiler #1	B-1	Prior to 4/14/72	None
	Natural Gas-Fired Boiler #2	B-2	Prior to 4/14/72	None
Grit Seal Lines	Grit Seal Line #1	GS-1	2/1988	Cyclone C-1
	Grit Seal Line #2	GS-2	2/1988	Cyclone C-1
Iron Phosphate Cleaning Tanks	Iron Phosphate Cleaning Tank (Apex Strapping Line)	A-1	8/1995	None
	Pilot Line Iron Phosphate Cleaning Tank (R&D Strapping Line)	PL-1	9/2001	None
Strapping Lines (Contact and Quench Pots)	Magnus 2 Strapping Line Contact Pot	M2-1	Prior to 4/14/72	None
	Magnus 2 Strapping Line Quench Pot	M2-2	Prior to 4/14/72	None
	Magnus 3 Strapping Line Contact Pot	M3-1	Prior to 4/14/72	None
	Magnus 3 Strapping Line Quench Pot	M3-2	Prior to 4/14/72	None
	Magnus 4 Strapping Line Contact Pot	M4-1	2/2000	Smog-Hog SH-1

	Magnus 4 Strapping Line Quench Pot	M4-2	2/2000	Smog-Hog SH-1
Strapping Coating Lines and Wax Applicators	Paint Applicator (Apex Strapping Line)	A-2	Prior to 4/14/72	None
	Electric Paint Drying Oven (Apex Strapping Line)	A-3	2/1985	None
	Wax Applicator/Electric Dryer (Apex Strapping Line)	A-4	Prior to 4/14/72	None
	Paint Dip Tank (Magnus 2 Strapping Line)	M2-3	Prior to 4/14/72	None
	Natural Gas-Fired Paint Drying Oven (Magnus 2 Strapping Line)	M2-4	Prior to 4/14/72	None
	Wax Applicator/Electric Dryer (Magnus 2 Strapping Line)	M2-5	Prior to 4/14/72	None
	Paint Dip Tank (Magnus 3 Strapping Line)	M3-3	Prior to 4/14/72	None
	Natural Gas-Fired Paint Drying Oven (Magnus 3 Strapping Line)	M3-4	Prior to 4/14/72	None
	Wax Applicator/Electric Dryer (Magnus 3 Strapping Line)	M3-5	Prior to 4/14/72	None
	Paint Dip Tank (Magnus 4 Strapping Line)	M4-3	2/2000	None
	Electric Paint Drying Oven (Magnus 4 Strapping Line)	M4-4	2/2000	Thermal Oxidizer
	Wax Applicator/Electric Dryer (Magnus 4 Strapping Line)	M4-5	2/2000	None
	Wax Applicator/Electric Dryer (1,000# Rewinder)	R-1	07/2001	None
Wax Applicator/Electric Dryer (Print Line)	PRINT-1	06/2001	None	

	Wax Applicator/Electric Dryer (#2 Slitting Line)	SLIT-2	02/2003	None
Cold Rolling Mill	Cold Rolling Mill	CRM	Prior to 4/14/1972	Mist Eliminators #1, 2
Punch Press Departments	Department #1	PPD-1	Prior to 01/01/1994	None
	Department #2	PPD-2	07/01/2001	None
Gasoline Storage Tank	Gasoline Non-Retail Dispensing Operations	UST 1A/1B	10/1995	None

#### IV. EMISSIONS INFORMATION

The proposed permit limits the source wide maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source-wide limit. Further unit specific emission unit limitations are found within Sections 5 and 7 of the proposed permit.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	183.05
Sulfur Dioxide (SO <sub>2</sub> )	----
Particulate Matter (PM)	77.61
Nitrogen Oxides (NO <sub>x</sub> )	29.81
HAP, not included in VOM or PM	----
Total	290.47

This proposed permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the proposed permit by T1, T1R, or T1N. Any conditions established in a construction permit [T1] pursuant to Title I and not revised or deleted in this proposed permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new [T1N] or revise [T1R] such conditions in a Title I permit, those conditions are consistent with the information provided in the Title V application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This proposed permit does not establish any new [T1N] requirements.

Emissions of Hazardous Air Pollutants (HAP)

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

V. EMISSIONS CONTROL PROGRAMS INFORMATION

Emissions Reduction Market System (ERMS)

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the proposed permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the proposed permit. The proposed permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions.

VI. MONITORING and COMPLIANCE ASSURANCE MONITORING (CAM) PLAN INFORMATION

- a. This source not being subject to the Compliance Assurance Monitoring (CAM) plan, because either emission units at this source do not utilize pollution control equipment or emission units are subject to NESHAP proposed after November 15, 1990 and excluded from the CAM requirements, pursuant to 40 CFR 64.2(b)(1)(i).
- b. The following emission units (or group of emission units) at the source utilize instrumental or non-instrumental monitoring procedures for verifying compliance with existing emission standards and/or limitations:

Emission Unit (Group of emission units)	Instrumental Monitoring Procedures (values and parameters measured)	Non-instrumental Monitoring Procedures (testing, recordkeeping, inspections, operational practices, etc.)	CAM Applicability Yes/No (based on the information provided in the CAAPP)
Fuel Combustion Emission Units	None	Natural gas usage	No
Grit Seal Lines	None	PM <sub>10</sub> testing	No
Iron Phosphate Cleaning Tanks	None	Records of natural gas usage and VOM content wt. %	No
Strapping Lines (Contact and Quench Pots)	None	Production and emission records	No

Strapping Coating Lines and Wax Applicators	None	Testing of: HAP organic content; Solids content; and VOM content	No
Cold Rolling Mill	None	Production and emission records	No
Punch Press Departments	None	Testing of VOM content of vanishing oil; production and emission records	No
Gasoline Storage Tank	None	Production and emission records	No

VII. OTHER PERTINENT INFORMATION

a. Fugitive Particulate Matter Operating Program

The fugitive operating program is intended to significantly reduce fugitive particulate matter emissions within certain affected locations and facilities in Illinois. The source is subject to the fugitive operating program for particulate matter. Normally, affected operations by this program include, but are not limited to, addressing normal traffic pattern roads, parking facilities, and material piles and handling. Usually a source addresses the programs through the use of water, oils, or chemical dust suppressants.

b. Risk Management Plan (RMP)

A risk management plan (RMP) is a program required for a source affected by Chemical Accident Prevention for reducing the levels of emissions during an emergency, consistent with safe operating procedures. If the Permittee becomes subject to the RMP then the Permittee would be required to immediately implement the appropriate steps described in this plan should an emergency be declared. The Permittee then would be required to maintain and have this plan on file with the Illinois EPA.

c. PM<sub>10</sub> Contingency Measure Plan

This stationary source meets the criteria in 35 IAC 212.700 and is required to prepare and submit a contingency measure plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The plan submitted to the Illinois EPA is incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U

## VIII. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source.

## IX. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a Title V permit. The Illinois EPA is therefore proposing to issue a Title V permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the proposed permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.