

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary
The Federally Enforceable State Operating Permit (FESOP)
LA-CO Industries, Inc.
Elk Grove Village, Cook County

Site Identification No: 031440AKH
Application No.: 95030004

Schedule

Public Comment Period Begins: June 5, 2014

Public Comment Period Closes: July 5, 2014

Illinois EPA Contacts

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I. INTRODUCTION

LA-CO Industries, Inc. currently operates under federally enforceable state operating permit (FESOP) which has 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). 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

LA-CO Industries, Inc. manufactures marking pens and sticks, sealants, joint compounds, fluxes, crayons, etc. They use paints produced at the site as well as purchased to fill marking pens. Marking sticks are made by mixing powder with wax, oils and solvents. The crayon production consists of mixing powder with oil and solvents, grinding received material and then pressing it in crayon. The equipment clean-up is done in two cold cleaning degreasers and by wipe cleaning. The principal air contaminant emitted from the facility is Volatile Organic Material (VOM), generated from solvent evaporation. Some of these materials contain hazardous air pollutants (HAP).

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 been operating 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 Clean Air Act and regulations promulgated thereunder. 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 this program. 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 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 board has specific standards for units emitting volatile organic material, e.g., 35 IAC, Part 218, Subpart E – Solvent Cleaning. Subpart AA – paint and Ink manufacturing.

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 continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the Solvent Cleaning operations are potentially subject to operational limitations of 35 IAC Part 218 Subpart E. However, solvent wipe cleaning operations are eligible for exemption from the Subpart E requirements due to permit limitations on plant-wide monthly cleaning solvent usage to below the applicability level of 500 pounds. The paint manufacturing operations are eligible for exemption from 35 Ill. Adm. Code part 218 Subpart AA requirements due to this permit limitations on annual VOM emission from this operation below applicability level of 25 tons per year.

The facility's operations are subject to general VOM emission limitation in 35 IAC 215.301 – Use of Organic Material of 8 lbs of VOM emission 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 for VOM, 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.