

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Hoffer Plastics Corporation for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
500 North Collins Street  
South Elgin, Illinois 60177

Site Identification No.: 089080AAC

Application No.: 00100072

Illinois EPA Contacts

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**I. INTRODUCTION**

Hoffer Plastics Corporation has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its plastic parts manufacturing facility at 500 North Collins Street in South Elgin. 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 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**

Hoffer Plastic Corporation manufactures various plastic parts. They operate 125 injection molding machines, nine gas fired generators, screw conveyor oven, and heaters.

The principal air contaminant emitted from the facility is carbon monoxide (CO) which is generated during the fuel combustion process. The CO emissions from the generators and other fuel combustion sources are based on standard emission factors established by the manufacturer and facility.

The injection molding machines emit volatile organic material emissions that are based manufacturers emissions information.

Fuel combustion emissions of sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and particulate matter (PM) are also emitted.

**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 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 CO, 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 in the greater Chicago area. The specific VOM rule for this source would be 35 Ill. Adm. Code 218.301. This rule requires that no person shall cause or allow the discharge of 8 pounds per hour of organic material into the atmosphere. 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 (PRINCIPAL EMISSION UNIT(S) IS/ARE) subject to (RULE), which requires (DESCRIPTION OF STANDARD). 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 (DISCUSSION OF KEY LIMITATIONS, E.G., THE MINIMUM CONTROL EFFICIENCY AND THE AMOUNT OF VOM IN INK AND PRINTING SOLUTIONS USED AT THIS PLANT). These limitations are consistent with the historical operation of emission units at the plant.

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.

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