

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
1021 N. Grand Avenue East  
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Project Summary for an Application from  
Bell Racing Company  
for Issuance of the Construction Permit for  
116 East Neal Drive, Rantoul

Site Identification No.: 019065ABQ  
Application No.: 08070050

Schedule

Public Comment Period Begins: November 26, 2008  
Public Comment Period Closes: December 26, 2008

Illinois EPA Contacts

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## **I. INTRODUCTION**

Bell Racing Company has applied for a construction permit for its Rantoul plant to modify their mold powder coating booth to add liquid coating capability and to add a new helmet cleaning solvent. This modification results in increase of emissions of volatile organic materials (VOM) and hazardous air pollutants (HAP), including increase in emission of a single HAP, styrene, over 8 tons per year. This modification makes the facility potential subject to the requirements of Part 112(g) of the Clean Air Act (Act) – National Emission Standards for Hazardous Air Pollutants. The Bell Racing Company has proposed to restrict its production rate at the level which would limit emissions of a single HAP from modified emission unit to less than 10 tons per year. These limits would prevent the facility from being subject to Section 112(g) of the Act. The Illinois EPA has prepared a draft of the construction 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**

The company manufactures auto racing reinforced fiberglass helmets. Manufacturing process consists of applying the layers of polystyrene resin and jell to the mold. Mold surface is coated with powder and liquid coatings. Before coating the helmets are cleaned with organic solvents. Both operations, coating and solvent cleaning, are sources of VOM and HAP emissions.

## **III. GENERAL DISCUSSION**

The limitations established by the construction permit 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 limitations on the operation of a source restrict the potential emissions of the source.

The construction permit limits the operation and annual emissions of the plant to below the threshold level of 10 tons per year of single HAP excluding source from the requirements of Section 112(g) of the Act.

## **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., general VOM emission limitation found in 35 Ill. Adm. Code 215.301 – Use of Organic Material.

The source potentially could be subject to the 40 CFR Part 63, Subpart PPPP — National Emission Standards for Surface Coating of Plastic Parts and Products and Subpart WWWW - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production. The source is exempted from the requirements of these subparts due to federally enforceable 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 construction 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 coating and cleaning operations are subject to 35 IAC 218.301, which restricts VOM emissions from any emission unit to less than 8 lb/hr. 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 modification is not triggering major source status for HAP and does not need to undergo Section 112(g) review. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 10 tons for an individual HAP and 25 tons for combined HAPs.

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 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.