

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
REASONABLY AVAILABLE CONTROL)	R10-8
TECHNOLOGY (RACT) FOR VOLATILE)	(Rulemaking-Air)
ORGANIC MATERIAL EMISSIONS FROM)	
GROUP II CONSUMER & COMMERCIAL)	
PRODUCTS: PROPOSED AMENDMENTS)	
TO 35 ILL. ADM. CODE 211, 218, and 219)	

NOTICE

To: John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the FIRST NOTICE COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: February 17, 2010

1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

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FIRST NOTICE COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

The Illinois Environmental Protection Agency ("Illinois EPA"), by its attorney, respectfully submits its comments in the above rulemaking proceeding regarding first notice, published on February 5, 2010. (See 34 Ill. Reg. 1766-2086).

The Illinois EPA proposes the following clarifications and corrections to the first notice version of the proposal:

- 1) In Section 218.187(a)(1), the Illinois EPA recommends inserting the word "at" for clarification purposes, as set forth below.

Section 218.187 Other Industrial Solvent Cleaning Operations

- a) Applicability. On and after April 1, 2011:
 - 1) Except as provided in subsection (a)(2) of this Section, the requirements of this Section shall apply to all cleaning operations that use organic materials at sources that emit a total of 6.8 kg/day (15 lbs/day) or more of VOM from cleaning operations at the source, in the absence of air pollution control equipment. For purposes of this Section, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;

2) In Section 218.205(b)(1), the first notice version of the proposal deletes a slash mark between “kg” and “l” and inserts an open parenthesis that breaks up the unit of measurement.

The Illinois EPA therefore proposes the following amendment.

b) No owner or operator of a miscellaneous metal parts and products coating line subject to the limitations of Section 218.204(j) of this Subpart shall apply coatings to miscellaneous metal parts or products on the subject coating line unless the requirements in subsection (b)(1) or (b)(2) of this Section are met.

1) For each coating line which applies multiple coatings, all of which are subject to the same numerical emission limitation within Section 218.204(j) during the same day (e.g., all coatings used on the line are subject to 0.42 kg/l (3.5 lbs/gal)), the daily-weighted average VOM content shall not exceed the coating VOM content limit corresponding to the category of coating used, or

3) The first notice version of the rule reformats Section 218/219.401(c)(1), which changes several internal cross references. The first notice version, however, does not amend these references in the appropriate locations. This omission results in references to subsections that no longer exist (for example, the rule contains references to subsections (c)(1)(C) and (c)(1)(D), which do not exist pursuant to the first notice format) and references to subsections that no longer contain the pertinent information (for example, existing references to subsection (c)(1)(B) should now reference subsection (c)(1)(A)(ii) pursuant to the first notice format). Incorrect references appear in several flexographic printing sections/subsections, including Sections 218/219.401(c)(1), (c)(2), (c)(4), (c)(6), and 218/219.403. To avoid confusion, erroneous references, and any unintended substantive changes to subsection (c), the Illinois EPA proposes that the subsection be reformatted consistent with the Illinois EPA’s original proposal.

Returning subsection (c) to its original format will resolve the issues set forth above, without altering any substantive first notice revisions. Alternatively, if the formatting changes set forth

in first notice are kept, the Illinois EPA recommends that the internal cross references be corrected consistent with such changes.

4) In its Motion to Amend Rulemaking Proposal, the Illinois EPA proposed deleting certain existing language in Section 218/219.404(b)(1)(B) and (d)(1)(D) in response to a request by industry representatives (*See* Motion to Amend Rulemaking Proposal, Item Number 6). Such language still appears in the first notice version of the proposal, however. In the event that the language was mistakenly left in the proposed rule, the Illinois EPA recommends that it be deleted as follows:

Section 218/219.404(b)(1)(B):

- B) Calculations which demonstrate that total maximum theoretical emissions of VOM from all flexographic and rotogravure printing lines at the source never exceed 90.7 Mg (100 tons) per calendar year before the application of capture systems and control devices. Total maximum theoretical emissions of VOM for a flexographic or rotogravure printing source is the sum of maximum theoretical emissions of VOM from each flexographic and rotogravure printing line at the source. The following equation shall be used to calculate total maximum theoretical emissions of VOM per calendar year before the application of capture systems and control devices for each flexographic and rotogravure printing line at the source:

$$E_p = A \times B + 1095 (C \times D \times F)$$

where:

E_p = Total maximum theoretical emissions of VOM from one flexographic or rotogravure printing line in units of kg/year (lbs/year);

A = Weight of VOM per volume of solids of the coating or ink with the highest VOM content as applied each year on the printing line in units of kg VOM/1 (lbs VOM/gal) of coating or ink solids;

B = Total volume of solids for all coatings and inks that can potentially be applied each year on the printing line in units of 1/year (gal/year). The instrument and/or method by which the owner or operator accurately

~~measured or~~calculated the volume of each coating and ink as applied and the amount that can potentially be applied each year on the printing line shall be described in the certification to the Agency;

Section 218/219.404(d)(1)(D):

- D) The ~~instrument or~~method by which the owner or operator will accurately ~~measure or~~calculate the volume, or weight of solids, as applicable, of each coating and ink as applied each day on each printing line.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By 
Dana Vetterhoffer
Assistant Counsel
Division of Legal Counsel

DATED: February 17, 2010

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CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state that I have served electronically the attached FIRST NOTICE COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY upon the following person:

John Therriault, Assistant Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218

and electronically to the following persons:

SEE ATTACHED SERVICE LIST.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 
Dana Vetterhoffer
Assistant Counsel
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DATED: February 17, 2010

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Service List R10-8

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