

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Sloan

Franklin Park, Illinois

Proceedings Pursuant to

Section 113(a)(1) of the

Clean Air Act, 42 U.S.C.

§ 7413(a)(1)

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NOTICE OF VIOLATION

EPA-5-25-IL-5

NOTICE OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation under Section 113(a)(1) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(1). EPA finds that Sloan is violating the Illinois State Implementation Plan (SIP), as follows:

Statutory and Regulatory Background

1. On September 9, 1994, EPA approved Part 211 Subpart B as part of the federally enforceable SIP for Illinois. 59 Fed. Reg. 46562.
2. Ill. Admin. Code tit. 35, § 211.1550 states that "Conveyorized Degreasing" means the continuous process of cleaning and removing soils from surfaces utilizing either cold or vaporized solvents.
3. Ill. Admin. Code tit. 35, § 211.4170 states that "Open Top Vapor Degreasing" means the batch process of cleaning and removing soils from surfaces by condensing hot solvent vapor on the colder metal parts.
4. On September 9, 1994, EPA approved Part 218 Subpart E as part of the federally enforceable SIP for Illinois. 59 Fed. Reg. 46562.
5. Ill. Admin. Code tit. 35, § 218.103 states that the "provisions of this Part shall apply to all sources located in the Chicago area, which is composed of Cook, DuPage, Kane, Lake, McHenry, and Will Counties, and Aux Sable Township and Goose Lake Township in Grundy County, and Oswego Township in Kendall County."
6. On September 9, 1994, EPA approved Part 218 Subpart E as part of the federally enforceable SIP for Illinois. 59 Fed. Reg. 46562.
7. Ill. Admin Code tit. 35, § 218.108(b) states that notwithstanding the provisions of any other Sections of Part 218, any equivalent alternative control plan, equivalent device, or other equivalent alternative practice authorized by IEPA where Part 218 provides for such alternative or equivalent practice or equivalent variations or alterations to test methods approved by IEPA shall be effective only when included in a federally enforceable permit or approved as a SIP revision.

8. III. Admin. Code tit. 35, § 218.181 states that the requirements of Sections 218.182, 218.183, 218.184, and 218.186 of Subpart E shall apply to all cold cleaning, open top vapor degreasing, and conveyorized degreasing operations which use volatile organic materials.
9. III. Admin. Code tit. 35, § 218.184 states that the requirements for Conveyorized Degreasing are:
 - a) Operating requirements: No person shall operate a conveyorized degreaser unless:
 - 1) Exhaust ventilation exceeding 20 cubic meters per minute per square meter (65 cubic feet per minute per square foot) of area of loading and unloading opening is not used, unless necessary to meet the requirements of the Occupational Safety and Health Act (29 U.S.C. Section 651 et seq.);
 - 2) Solvent carryout emissions are minimized by:
 - A) Racking parts for best drainage; and
 - B) Maintaining the vertical conveyor speed at less than 3.3 m/min (11 ft/min);
 - 3) Waste solvent is stored in covered containers only and not disposed of in such a manner that more than 20% of the waste solvent (by weight) is allowed to evaporate into the atmosphere;
 - 4) Solvent leaks are repaired immediately;
 - 5) Water is not visually detectable in solvent exiting from the water separator; and
 - 6) Downtime covers are placed over entrances and exits of conveyorized degreasers immediately after the conveyors and exhausts are shut down and not removed until just before start-up.
 - b) Equipment Requirements: No person shall operate a conveyorized degreaser unless:
 - 1) The degreaser is equipped with a drying tunnel, rotating (tumbling) basket or other equipment sufficient to prevent cleaned parts from carrying out solvent liquid or vapor;
 - 2) The degreaser is equipped with the following switches:
 - A) One which shuts off the sump heat source if the amount of condenser coolant is not sufficient to maintain the designed vapor level;
 - B) One which shuts off the spray pump or the conveyor if the vapor level drops more than 10 cm (4 in) below the bottom condenser coil; and

- C) One which shuts off the sump heat source when the vapor level exceeds the design level.
 - 3) The degreaser is equipped with openings for entrances and exits that silhouette workloads so that the average clearance between the parts and the edge of the degreaser opening is less than 10 cm (4 in) or less than 10 percent of the width of the opening;
 - 4) The degreaser is equipped with downtime covers for closing off entrances and exits when the degreaser is shut down; and
 - 5) The degreaser is equipped with one of the following control devices, if the air/vapor interface is larger than 2.0 square meters (21.6 square feet):
 - A) A carbon adsorption system with ventilation greater than or equal to 15 cubic meters per minute per square meter (50 cubic feet per minute per square foot) of air/vapor area when downtime covers are open, and exhausting less than 25 ppm of solvent by volume averaged over a complete adsorption cycle; or
 - B) Any other equipment or system of equivalent emission control as approved by the Agency, and further processed consistent with Section 218.108 of this Part. Such equipment or system may include a refrigerated chiller.
- 10. Ill. Admin. Code tit. 35, § 218.186 states that the following test methods shall be used to demonstrate compliance with Part 218, Subpart E:
 - a) Vapor pressures shall be determined by using the procedure specified in Section 218.110 of Part 218.
 - b) Exhaust ventilation rates shall be determined by using the procedures specified in Section 218.105(f)(3) of Part 218.
 - c) The performance of control devices shall be determined by using the procedures specified in Section 218.105(f) of Part 218.
- 11. On January 3, 2023, Ill. Admin. Code tit. 35, § 201.157 was approved as part of the federally enforceable SIP for Illinois. 65 Fed. Reg. 14.
- 12. Ill. Admin. Code tit. 35, § 201.157 states that an application for an operating permit shall contain, as a minimum, the data and information specified in Section 201.152. Each application shall list all individual emission units and air pollution equipment for which a permit is sought. Any applicant may seek to obtain from the Agency a permit for each emission unit, or such emission units as are similar in design or principle of operation or function, or for all emission units encompassed in an identifiable operating unit, unless subject to the provisions of Section 201.169 of this Subpart or required to obtain an operating permit with federal enforceable

conditions pursuant to Section 39.5 of the Act. To the extent that the above specified data and information has previously been submitted to the Agency pursuant to this Subpart, the data and information need not be resubmitted; provided, however, that the applicant must certify that the data and information previously submitted remains true, correct and current. An application for an operating permit shall contain a description of the startup procedure for each emission unit, the duration and frequency of startups, the types and quantities of emissions during startup, and the applicant's efforts to minimize any such startup emissions, duration of individual startups, and frequency of startups. If applicable, pursuant to the requirements of Subpart I of this Part, an application for a permit shall contain a description of the startup procedure for each emission unit, the duration and frequency of startups and quantities of emissions during startup in excess of emissions during operations, and the applicant's efforts to minimize any such startup emissions. The Agency may adopt procedures that require data and information in addition to and in amplification of the matters specified in the first sentence of this Section, that are reasonably designed to determine compliance with this Chapter, and ambient air quality standards, and that set forth the format by which all data and information shall be submitted.

13. On January 5, 2022, EPA published a rule amending the CAA Section 112 List of Hazardous Air Pollutants (HAPs). The list of HAPs under the CAA was amended to add 1-bromopropane and the rule went into effect on February 4, 2022. 87 Fed. Reg. 393.

Factual Background

14. Sloan owns and operates a flush valve manufacturing facility at 10500 Seymour Avenue, Franklin Park, Cook County, Illinois (the Facility).
15. The Facility is subject to the Illinois SIP.
16. Sloan operates, among other things, a vapor degreaser at the Facility.
17. On December 6, 2023, EPA performed an on-site inspection of the Facility.
18. On March 25, 2024, EPA issued an information request to Sloan pursuant to Section 114 of the CAA (the Information Request). Sloan responded on May 30, 2024.
19. In response to the Information Request, Sloan stated the following about the vapor degreaser:
 - a) The vapor degreaser operates in a continuous mode;
 - b) It is a conveyORIZED degreaser;
 - c) The solvent/air interface for the three chambers of the vapor degreaser are 30 square feet per tank. There are 3 tanks within the vapor degreaser;
 - d) There is no drying tunnel in the vapor degreaser;

e) There is a chilled water supply to condenser coils that creates a vapor barrier where solvent is removed from the parts and equipment to prevent escape of solvent and fumes; and

f) The vapor degreaser operates 2,500 hours per year.

20. Prior to and after the HAPs list was amended to add 1-bromopropane on February 4, 2022, Sloan reported annual 1-bromopropane emissions of greater than 10 tons per year. In response to the Information Request, Sloan submitted the following 1-bromopropane emissions.

	2019	2020	2021	2022	2023
Tons per year	11.1799	12.8514	18.0401	20.1921	17.5319
Pounds per hour	8.7686	10.0796	14.1491	15.8370	14.0255

21. On January 25, 2023, Sloan completed an application for a Title V permit under the IEPA Clean Air Act Permit Program (CAAPP).
22. In its application, Sloan identified its vapor degreaser as a Batch Vapor Degreaser and an Open Top Vapor Degreaser and not as a conveyorized degreaser.
23. In its application, Sloan also stated that the diameter of the exhaust point of the vapor degreaser is 3.38 square feet, the vapor degreaser has no air pollution controls, and the emissions from the vapor degreaser are subject to Ill. Admin. Code tit. 35, § 218.301.
24. On September 5, 2023, the Illinois Environmental Protection Agency (IEPA) issued a Title V permit (Permit No. 23020002) to Sloan.
25. The Title V permit requires Sloan operate the degreaser in accordance with the provisions of the Illinois SIP for Open Top Vapor Degreasing, found at Ill. Admin. Code tit. 35, § 218.183.
26. Based on the Information Request Response provided by Sloan, which included the dimensions of its vapor degreaser, EPA calculated what the emissions of 1-bromopropane should be in pounds per hour and tons per year if the refrigerated chiller worked equivalently to a carbon adsorption system with 25 ppm emission as required by Ill. Admin. Code tit. 35, § 218.184(b)(5)(B).
27. The 1-bromopropane emissions reported by Sloan exceed the calculated emissions of a carbon adsorption system or equivalent emission control functioning in accordance with at Ill. Admin. Code tit. 35, § 218.184(b)(5).

Violations

28. By not classifying its vapor degreaser as a conveyorized degreaser, Sloan has failed to submit a permit application with information that is true and correct, in violation of the Illinois SIP at Ill. Admin. Code tit. 35, § 201.157 and Section 113(a), 42 U.S.C. § 7413(a) of the CAA.
29. By failing to utilize a carbon adsorption system or an equivalent emission control consistent with Ill. Admin. Code tit. 35, § 218.108, Sloan is in violation of the Illinois SIP at Ill. Admin. Code tit. 35, § 218.184(b)(5) and Section 113(a), 42 U.S.C. § 7413(a) of the CAA.

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