

## Project Summary

### I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Borg-Warner Automotive Automatic Transmission System Corporation (Borg-Warner) is located at 700 South 25th Avenue in Bellwood. The source manufactures friction plates used in automotive transmissions and other drive train components. A friction plate is comprised of a steel core and one or two paper facings. The steel cores are stamped from coiled steel, acid cleaned, and then coated with adhesive. Paper, saturated with resin to enhance durability, is then stamped to fit onto the steel core. In some cases, however, adhesive is applied to the paper before stamping rather than to the steel core. A friction plate is made after the paper facings and the steel cores are bonded together. As a final step, the friction plates are sanded to desired thickness and grooved to enhance the plate's performance in a transmission.

### II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
GL1	Glue Line Dip Tank with Natural Gas-Fired Curing Oven (350,000 Btu/hr) (Glue Line 1)	1960	Thermal Oxidizer SR9000
GL2	Glue Line Dip Tank with Natural Gas-Fired Curing Oven (350,000 Btu/hr) (Glue Line 2)	1960	Thermal Oxidizer SR9000
GL3	Glue Line Dip Tank with Natural Gas-Fired Curing Oven (350,000 Btu/hr) (Glue Line 3)	1960	Thermal Oxidizer SR9000
RCGLI	Continental Equipment Corp. Model D0481-001 Roller Coater with 3 Stage Natural Gas-Fired Oven (800,000 Btu/hr) (Roll Coater Glue Line I)	September, 1997	Thermal Oxidizer SR9000
CPF1	Pollution Control Products Co. Model #27A Controlled Pyrolysis Cleaning Furnace (Controlled Pyrolysis Furnace 1)	1983	Internal Afterburner
CPF2	Pollution Control Products Company Model PTR-340 Controlled Pyrolysis Cleaning Furnace (Controlled Pyrolysis Furnace 2)	1989	Internal Afterburner
CPF3	Pollution Control Products Co. Model PRC 340 Controlled Pyrolysis Cleaning Furnace (Controlled Pyrolysis Furnace 3)	1996	Internal Afterburner



Emission Unit	Description	Date Constructed	Emission Control Equipment
BLU SURF	Paper Gluing and Curing Process (Blu Surf)	June, 1972	BLU SURF Catalytic Oxidizer
ROSS I	Midland Ross Saturating, Pre-Curing, and Curing Line (Ross I)	May, 1980	ROSS I Thermal Oxidizer
ROSS II	Ross-Waldron Model L5093/5094 Saturating, Pre-Curing, & Curing Line (Ross II)	November, 1984	ROSS II Thermal Oxidizer
PM	Paper Machining Process (Slitting, Blanking, Sanding, Sizing, and Grooving)	Prior to April 14, 1972	Two Cyclones
VIA	Videojet Ink Application	Unknown	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Nitrogen Oxides (NO <sub>x</sub> )	46.86
Particulate Matter (PM)	12.91
Sulfur Dioxide (SO <sub>2</sub> )	0.25
Volatile Organic Material (VOM)	438.44
HAP, not included in VOM or PM	--
Total	498.46

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft 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 Ill. Adm. Code Part 166.