

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

International Truck and Engine Corp.
Attn.: Sanjay Patel
10400 West North Avenue
Melrose Park, Illinois 60160

Permit Engineer/Technical Contact: Sunil Suthar, 217/782-2113

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Springfield, Illinois

I. INTRODUCTION

This source has applied for a renewal Title V - Clean Air Act Permit Program (CAAPP) operating permit (I.D. 031186ABK, Permit #95080106) for its operation. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by the federal Clean Air Act, as amended in 1990, and 40 CFR Part 70. Unlike state operating permits, the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A Title V permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

II. SOURCE DESCRIPTION INFORMATION

a. Location and nature of business

International Truck and Engine Corp. is located at 10400 West North Avenue in Melrose Park. The source is an assembly plant for diesel engines. After assembly each engine is tested for durability and performance in any of International's several computerized engine test cells. The source also engages in research and development of diesel engine. Diesel engine development and testing is conducted in 70 such engine test cells, other test cells are audit test cells. In addition, International operates a cogeneration system to supply energy for peak demand periods at the plant.

b. National Ambient Air Quality Standard status for this area

This source is located in an area that is in non-attainment of the National Ambient Air Quality Standards for ozone, PM₁₀ and PM_{2.5} and attainment for all other pollutants.

c. Major source status

This permit is issued based on the source requiring a CAAPP permit as a major source of CO, NO_x, and VOM emissions

d. Significant emission units

Emission Unit	Description	Date Constructed	Emission Control Equipment
PB1	Binks Paint Spray Booth (Paint Booth #1)	Prior to 1970	Water Curtain
PB2	George Koch & Sons, Inc. Paint Spray Booth (Paint Booth #2)	February, 1995	Water Curtain
DOO	George Koch & Sons, Inc. Dry-Off Oven (Dry-Off Oven)	February, 1995	None
2SDO	George Koch & Sons, Inc. Two Stage Drying Oven (Two Stage Drying Oven)	February, 1995	None
B1	Stone Johnson Boiler (Boiler #1)	October, 1988	None
B2	Stone Johnson Boiler (Boiler #2)	October, 1988	None
B3	Stone Johnson Boiler (Boiler #3)	October, 1988	None
NGDDF	Lanley Draw Furnace (NGD Crankshaft Draw Furnace)	April, 1992	None
L-3	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
L-6	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
L-9	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
L-13	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
BB-3	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
BB-8	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
BB-12	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
N-18	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
G-12	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
G-8	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
G-4	Rapid Model 3073 Natural Gas Fired Space Heater (8.25 mmBtu/hr)	November, 1987	None
BB-7	Rapid Model SR66 Natural Gas Fired Space Heater (6.25 mmBtu/hr)	November, 1987	None
B-23	Rapid Model 3060 Natural Gas Fired Space Heater (4.25 mmBtu/hr)	November, 1987	None
10-E	Rapid Model 3049 Natural Gas Fired Space Heater (3.25 mmBtu/hr)	November, 1987	None
A-20	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
C-20	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
D-20	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
E-20	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
F-20	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
G-20	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
H-20	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
I-20	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
I-16	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
G-24	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
K-15	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
K-18	Buffalo Model C-25-210-GFU Natural Gas Fired Space Heater (2.5 mmBtu/hr)	May, 1971	None
AA-21-3	Hartzell Model G-2512 Natural Gas Fired Space Heater (2.5 mmBtu/hr)	November, 1970	None
AA-21-4	Hartzell Model G-2512 Natural Gas Fired Space Heater (2.5 mmBtu/hr)	November, 1970	None
D-2	Hartzell Model G-259 Natural Gas Fired Space Heater (2.5 mmBtu/hr)	November, 1970	None
H-2	Hartzell Model G-259 Natural Gas Fired Space Heater (2.5 mmBtu/hr)	November, 1970	None
L-9	Devilbliss Model ARG-50 Natural Gas Fired Space Heater (5.2 mmBtu/hr)	January, 1970	None
AA-17	Devilbliss Model ARG-50 Natural Gas Fired Space Heater (5.2 mmBtu/hr)	January, 1970	None
L-13-0	Devilbliss Model ARG-50 Natural Gas Fired Space Heater (5.2 mmBtu/hr)	January, 1970	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
L-13-3	Devilbliss Model ARG-50 Natural Gas Fired Space Heater (5.2 mmBtu/hr)	January, 1970	None
ETC	79 Navistar International Transportation Corp. Engine Test Cells	Prior to 1970	None
COGEN	12 Caterpillar Model G3516SITA Natural Gas Spark Ignition Reciprocating Engines	July, 1992	3-Way Catalytic Converters (12)
EETC	15 Navistar International Transportation Corp. Engineering Engine Test Cells	1998	None
TG	13,488,800 Btu/Hr Caterpillar Model #3516 #2 Fuel Oil Fired Internal Combustion Engine (Temporary Generator)	September, 1999	None
CPC	Cold Parts Cleaning Operations	Pre 1980	None

III. EMISSIONS INFORMATION

The proposed permit limits the source wide maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source-wide limit. Further unit specific emission unit limitations are found within Sections 5 and 7 of the proposed permit.

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

Pollutant	Tons/Year
Nitrogen Oxides (NO _x)	336.860
Particulate Matter (PM)	34.360
Sulfur Dioxide (SO ₂)	7.770
Volatile Organic Material (VOM)	96.950
HAP, not included in VOM or PM	0.004
Total	475.944

The proposed permit does not limit the maximum annual source wide emissions from significant emission units at the source. Unit specific emission unit limitations are found within Sections 5 and 7 of the proposed permit.

This proposed permit contains terms and conditions that address the applicability, and, if determined applicable, substantive requirements of Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the proposed permit by T1, T1R, or T1N. Any conditions established in a construction permit [T1] pursuant to Title I and not revised or deleted in this proposed permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new [T1N] or revise [T1R] such conditions in a Title I permit, those conditions are consistent with the information provided in the Title V application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This proposed permit does not establish any new [T1N] requirements or revised [T1R] requirements.

IV. EMISSIONS CONTROL PROGRAMS INFORMATION

a. Emissions Reduction Market System (ERMS)

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the proposed 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 proposed permit. The proposed 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.

V. COMPLIANCE ASSURANCE MONITORING (CAM) PLAN INFORMATION

The Compliance Assurance Monitoring (CAM) plan is a program for pollutant-specific emission units which use an add-on control device to achieve compliance with an emission limitation or standard, has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than major source threshold levels, and is not specifically exempt by 40 CFR Part 64. Subject units and the CAM plans are identified in Attachment 3 of the proposed permit.

VI. OTHER PERTINENT INFORMATION

a. Fugitive Particulate Matter Operating Program

The fugitive operating program is intended to significantly reduce fugitive particulate matter emissions within certain affected locations and facilities in Illinois. The source is subject to the fugitive operating program for particulate matter. Normally, affected operations by this program include, but are not limited to, addressing normal traffic pattern roads, parking facilities, and material piles and handling. Usually a source addresses the programs through the use of water, oils, or chemical dust suppressants.

b. Risk Management Plan (RMP)

A risk management plan (RMP) is a program required for a source affected by Chemical Accident Prevention for reducing the levels of emissions during an emergency, consistent with safe operating procedures. If the Permittee becomes subject to the RMP then the Permittee would be required to immediately implement the appropriate steps described in this plan should an emergency be declared. The Permittee then would be required to maintain and have this plan on file with the Illinois EPA.

c. Episode Action Plan (EAP)

An episode action plan (EAP) is a program for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Permittee is required to immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared. The Permittee is required to maintain and have this plan on file with the Illinois EPA.

d. PM₁₀ Contingency Measure Plan

If the Permittee becomes subject to a contingency measure plan then the Permittee will be required to prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions. Such plan will be incorporated by reference into the proposed permit and shall be implemented by the Permittee.

VII. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source.

VIII. REQUEST FOR COMMENTS

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

Comments are requested by the Illinois EPA for the proposed 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.

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