

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary
For a Revised Construction Permit Application
From Titan Tire Corporation of Freeport
For Co-generation System For
The Tire Manufacturing Facility,
In Freeport, Stephenson County

Site Identification No.: 177813AAA

Application No.: 95010051

Date Received: September 3, 2008

Schedule

Public Comment Period Begins: November 11, 2008

Public Comment Period Closes: December 11, 2008

Illinois EPA Contacts

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I. INTRODUCTION

Titan Tire Corporation of Freeport (Titan Tire) has requested a revised construction permit for its cogeneration system. The cogeneration system consists of three gas turbines, which supply electricity and steam to Titan Tire's tire manufacturing plant. The original construction permit for the cogeneration system, which was issued in 1995, required two existing natural gas fired boilers (Boiler 1 and 2) be shutdown and cease operation once the cogeneration system began operating. As a result, the cogeneration project did not constitute a major modification subject to federal rules for Prevention of Significant Deterioration (PSD) with the contemporaneous decrease in emissions from the shutdown of existing boilers.

Titan Tire has applied for a revised permit that would allow operation of the Boiler 2 to resume. The Illinois EPA has reviewed Titan Tire's application and made a preliminary determination that the application meets applicable requirements. While the revised permit would only require one boiler to be shutdown, the operation of the remaining boilers (Boilers 2, 3 and 4) would still be limited to provide the necessary decrease in emissions of nitrogen oxides (NOx) so that the cogeneration system would not be a major modification. Accordingly, the Illinois EPA has prepared a draft of the revised construction permit that it would propose to issue. However, before issuing this permit, the Illinois EPA is holding a public comment period to receive comments on the terms and conditions of the draft permit.

II. CHANGES IN THE PERMIT

The changes present in the revised permit as compared to the original permit would include the following:

- Emissions and operating limitations are set for the three existing boilers (Boiler 2, 3, and 4) that may operate limiting NOx emissions to less than the significant emission increase thresholds so that the re-activation of Boiler 2 by itself would not constitute a major modification subject to the federal rules for PSD.
- Requirement for shutdown of Boiler 2 would be absent and re-activation of Boiler 2, which was idled when the cogeneration system originally began operation, would be authorized.
- The permit addresses the net emission change as a "current project" addressing reactivation of Boiler 2 as a new project proposed in 2008, as well as a "revised project" addressing reactivation of Boiler 2 as a revision to the original netting analysis for the cogeneration system would be included, showing non-major project status.
- The permit addresses whether re-activation of Boiler 2 potentially would constitute "reconstruction", finding that because the cost of activities to re-start the boiler is less than 50% of the fixed capital cost to construct a comparable new boiler, Boiler 2 would not be subject to the NSPS, 40 CFR 60, Subpart Db, pursuant to 40 CFR 60.15.

III. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the revised permit would meet all applicable state and federal air pollution control requirements. The Illinois EPA is therefore proposing to issue a revised construction permit for the facility.

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.