

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
C. E. Niehoff & Company for a
Federally Enforceable State Operating Permit (FESOP) for
2021 Lee Street
Evanston, Illinois

Site Identification No.: 031081AFV
Application No.: 100200012

Schedule

Public Comment Period Begins: September 2, 2010
Public Comment Period Closes: October 2, 2010

Illinois EPA Contacts

Permit Analyst: George Kennedy
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

C. E. Niehoff & Company has applied for Federally Enforceable State Operating Permit (FESOP) for its Plant located in Evanston, Illinois. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of this permit that it would propose to issue for the plant. However, before issuing this permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

C. E. Niehoff & Company designs and manufactures heavy duty brushless alternators for motor vehicles. The emission units at this plant that require operating construction permit include coating spray booths rotor laminator, varnish dip tank, degreasers, parts washers, solvent wipe cleaning, and solder flux remover. These units are sources of emissions because of the volatile organic material (VOM) contained in the solvents used in these units. These solvents also contained components considered hazardous air pollutants (HAPs).

III. GENERAL DISCUSSION

This source has applied for a Federally Enforceable State Operating Permits (FESOPs) which are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source is to operate this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need not obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has specific standards for units emitting volatile organic material in the Greater Chicago area; these standards include 35 Ill. Adm. Code 218.204(j)(2) which limits the VOM content of

coatings for Miscellaneous Material Parts and Products Extreme Performance, 35 Ill. Adm. Code 218.183 which requires certain operating conditions, and 35 Ill. Adm. Code 218.1837 which sets requirements to cleaning operations which use organic materials. The application shows that the plant is in compliance with applicable state emission and federal standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing to issue would identify the specific emission standards that apply to the emission units at the plant. As explained, the rotor laminator would be subject to 35 Ill. Adm. Code 218.204(j)(2), which sets limits as to the VOM contained in the coating; and the degreasers would subject to 35 Ill. Adm. Code 218.183 which set operating conditions under which these units would be allowed to operate. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the 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 IAC Part 166.