

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
HENDERICKSON Bumper and Trim for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
501 Caton Farm Road
Crest Hill, Illinois 60434

Site Identification No.: 197025AAF
Application No.: 86010080

Schedule

Public Comment Period Begins: February 11, 2008
Public Comment Period Closes: March 12, 2008

Illinois EPA Contacts

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I. INTRODUCTION

Hendrickson Bumper and Trim has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Crest Hill, Illinois location. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the 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

Hendrickson Bumper and Trim is engaged in production of automotive metal parts. Manufacturing process includes press stamping, clean-up operations, and cold degreasing. These units are sources of emissions because of the evaporation of cleaning and degreasing solvents. Volatile organic materials (VOM) is the chief air pollutants released from the cleanup operation.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) 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 has been operating 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.

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 application shows that the plant is in compliance with applicable state emission standards.

V. CONTENTS OF THE PERMIT

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the above listed units are subject to 35 Ill. Adm. Code 218, which requires including VOM emissions from clean-up operations included in limits toward becoming major, and limiting discharge of VOM. 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.

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.