

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
1021 N. Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506

Project Summary for an Application from  
Parker Hannifin Corp. for  
Federally Enforceable State Operating Permit (FESOP) for  
Rubber Adhesive Bonding and Rubber Parts Plant  
Woodridge, Illinois

Site Identification No.: 197425AAA  
Application No.: 05120080

Schedule

Public Comment Period Begins: July 17, 2013  
Public Comment Period Closes: August 16, 2013

Illinois EPA Contacts

Permit Analyst: Jocelyn Stakely  
Community Relations Coordinator: Brad Frost

## **I. INTRODUCTION**

An application has been voluntarily submitted by the Parker Hannifin Corp., Inc. for their Rubber Adhesive Bonding and Rubber Parts Plant in order to voluntarily incorporate federally enforceable limits. These limits would prevent the above facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by recordkeeping requirements to assure that the plant is operated as a non-major source. Unlike the site's current operating permit(s), these conditions would be enforceable by both the State of Illinois and USEPA.

## **II. SOURCE DESCRIPTION**

Parker Hannifin Corp., Inc. manufactures rubber adhesive bonding and rubber parts.

The company operates:

Twenty-Four (24) Small Rubber Molding Presses;  
Forty-Four (44) Large Rubber Molding Presses;  
Three (3) Gas Curing Ovens Controlled by an Electrostatic Precipitator;  
Four (4) Gas Post Cure Ovens (Uncontrolled);  
Four (4) Electric Post Cure Ovens (Uncontrolled);  
Sleeve Making Operation;  
Two (2) Adhesive Application Dip Tanks; and  
Three (3) Abrasive Blaster (Parts Cleaning) Units

The transfer molding involves the distribution of uncured rubber stock from one part of the mold (the pot) into the actual mold cavity. This process permits the molding of complicated shapes or the imbedding of inserts (metal) in our products. The ovens are used to post cure the molded parts. The parts are blasted with aluminum oxide to create a roughened surface for better rubber adhesion. These processes are sources of emissions because emissions generated from rubber adhesive bonding and rubber parts manufacturing is volatile organic material (VOM) and hazardous air pollutants (HAP). Other contaminant formed by production process is particulate matter.

## **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, 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 standards for sources of Volatile Organic Material (VOM). The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern is volatile organic material (VOM) which is created by the rubber adhesive bonding and rubber parts plant. The facility has limited their throughput that will keep the VOM emissions below the major source threshold level of 100 tons per year for VOM.

Other emissions of hazardous air pollutants (HAP) are also emitted; however, their levels are also depended on the amount of VOM and will remain below the major source threshold level of 10 ton per year for single HAP and 25 ton per year for combined total HAPs.

#### **V. CONTENTS OF THE PERMIT**

This permit that the Illinois EPA is proposing to issue will identify the specific emission standards that apply to the emission units at the plant. 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 would also set limitations on requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on rubber adhesive bonding and rubber parts plant emissions. These limitations are consistent with the historical operation and capacity of the facility.

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 issuance of its permit. The Illinois EPA is therefore proposing to issue 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.