

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary
Federally Enforceable State Operating Permit (FESOP)
Altorfer, Inc.
6315 Fauber Road, Bartonville, Illinois 61607

Site Identification No.: 143808AAZ
Application No.: 08030061

Illinois EPA Contacts

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I. INTRODUCTION

Altorfer, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its manufacturing facility at 6315 Fauber Road in Bartonville. 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 permit that it would propose to issue for the plant. However, before issuing 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

Altorfer, Inc. fabricates modular electricity generator sets at the Subject facility. The processes that require an air pollution permit are a wet paint line, a powder coat line, three diesel engine test cells and one 100 gallon gasoline storage tank.

The current coating operations include a wet paint line and the fabricated parts are washed and oven-dried prior to application of the primer coat. The part is then cured in an oven followed by spraying of the desired top coat. The part is again oven-cured prior to final assembly.

The major air pollutant of concern at this facility is volatile organic material (VOM). The largest source of VOM at this facility is the coating operations. VOM is contained in the paints and solvents. The VOM is evaporated into the atmosphere when these materials are used.

The fuel combustion equipment combusts diesel fuel. Nitrogen oxides are emitted from the fuel combustion equipment. Nitrogen oxides are formed thermally by a combination of oxygen and nitrogen in the air at the temperatures at which fuel is burned. Thermal nitrogen oxides formed during the operation of all common high temperature combustion processes.

Carbon monoxide is also emitted from the fuel combustion equipment. It is formed by the incomplete combustion of fuel. Carbon monoxide is associated with most combustion processes and is found in measurable amounts in the exhausts of fuel combustion equipment. Other air contaminants formed by the combustion of diesel fuel are particulate matter, sulfur dioxide and VOM. These air pollutants are emitted in smaller amounts than nitrogen oxides and carbon monoxide.

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 applied for 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 to 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 Illinois Pollution Control Board has specific standards for units emitting volatile organic material. The specific standard for this company is 35 Ill., Adm. Code 215 Subpart F Regulations for Coating Operations. These regulations limit the amount of VOM that may be in the coatings used. There is a National Emission Standard for Hazardous Air Pollutants (NESHAP) for coating of miscellaneous metal parts and products, 40 CFR 63, subpart MMMM. The requirements of the NESHAP apply to major sources of hazardous air pollutants. This source has emission limits in its permit that keep the amount of hazardous air pollutants below major levels therefore the NESHAP regulations do not apply. The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing will identify the specific emission standards that apply to the emission units at the plant. As explained, the paint booth is subject to 35 Ill. Adm. Code 215.204(j), which requires extreme performance miscellaneous metal parts and products coatings not to contain more than 3.5 pounds of VOM per gallon of coating. 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 the amount of VOM used in the coatings and solvents. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also 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 that 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.