

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Caterpillar Inc. for Issuance of a
Construction Permit for
A Restructuring Project in
Decatur, Illinois

Site Identification No.: 115015AAK
Application No.: 10050013

Important Dates:

Comment Period Begins: May 20, 2010
Comment Period Closes: June 19, 2010

Illinois EPA Contacts:

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PROJECT SUMMARY

I. Introduction

A construction permit application has been submitted by Caterpillar, Inc. for a Restructuring Project at its plant in Decatur, Illinois. The application shows that the various changes to the painting operations at the plant will not result in a significant increase in emissions. For emissions of volatile organic material (VOM), this is because the project will be accompanied by the shutdown of certain existing painting operations.

II. Project Description

Currently, the plant generally assembles equipment first and then applies the finish coatings of paint to the assembled equipment. The restructuring entails modifications to the plant to enable finish painting of vehicles, and parts prior to final assembly. This will reduce the amount of paint that is used, improve overall paint quality, and improve worker safety.

Various changes are needed to certain existing paint lines to accommodate painting of free standing parts. When assembling equipment with finish painted parts, additional touch up coating would be required. This touchup coating will be performed in two new Customer Acceptance Booths. There will also be natural gas fired combustion units associated with the coating operations. These coating operations emit volatile organic material (VOM) and particulate matter (PM). The coating operations would have down draft spray booths equipped with dry filters for the control of PM emissions.

III. Emissions

The conditions in the proposed permit for the project are based on the project not being a major modification under 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

When considered by themselves, the new and modified coating lines addressed by this project will result in a significant increase in emissions, i.e., the emissions exceed 40 tons per year of volatile organic material. As a consequence, Caterpillar has elected to perform a netting exercise to show the project does not constitute a major modification of the source for purposes of the federal PSD program. The netting exercise involves an evaluation of emission increases and decreases which have occurred over a contemporaneous time period. The resulting netting exercise shows an emission rate which is less than the significant emission rate established by the federal PSD program. (See Attachment 2 of the draft permit.)

IV. Applicable Emission Standards

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for

sources of VOM emissions from coating operations. This project readily complies with all applicable Board standards.

The plant is subject to federal National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart M. Because Caterpillar does not have an add-on control device for control of VOM emissions, they will be required to utilize coatings and solvents that contain a lower hazardous air pollutant content.

V. Draft Permit

The conditions of the draft permit contain limitations and requirements to assure that this project will not be considered a major modification for purposes of the federal PSD program. The permit sets limitations on coating usage and VOM emissions.

The permit conditions also establish appropriate compliance procedures, including recordkeeping requirements and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the plant is operating within the limitations set by the permit.

VI. Request for Comments

It is the Illinois EPA's preliminary determination that the this project meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a construction permit for this project.

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.