

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
Honeywell Analytics, Inc. for a
Federally Enforceable State Operating Permit (FESOP) for
405 Barclay Boulevard
Lincolnshire, Illinois 60069

Site Identification No.: 097095AAD
Application No.: 05110015

Illinois EPA Contacts

Permit Analyst: David Hulskotter
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Honeywell Analytics, Inc. has applied for a Federally Enforceable State Operating Permit (FESOP) for its Lincolnshire, 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 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

Honeywell Analytics Inc. manufactures toxic and flammable gas detection equipment. The emission units at this plant that require an operating permit include tape processing machines. These tape processing machines are controlled by a regenerative thermal oxidizer. These units are sources of emissions because 10% of the volatile organic material (VOM) used in the coating process is emitted to the atmosphere. The remaining 90% volatile organic material is controlled by the thermal oxidizer. Other miscellaneous equipment at the facility includes small boilers, unit heaters and laboratory hoods.

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.

This a first time operating permit application. But, 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. The source is now applying for a FESOP. 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. 35 Ill. Adm. Code 218.207(1) requires the capture system and control device provide at least 90 percent reduction in the overall emissions of VOM from the coating line for paper coating. The

application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would 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.) 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 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.

DWH: