

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Springfield, Illinois 62794-9506

Project Summary for an Application from  
Modine Manufacturing Company  
for Issuance of the  
Federally Enforceable State Operating Permit (FESOP) for  
4400 Ringwood Road,  
Ringwood, Illinois 60072

Site Identification No.: 111811AAA  
Application No.: 87110005

Schedule

Public Comment Period Begins: July 29, 2010  
Public Comment Period Closes: August 28, 2010

Illinois EPA Contacts

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## **I. INTRODUCTION**

Modine Manufacturing Company currently operates under federally enforceable state operating permit (FESOP). The company applied for a revision of their FESOP to decrease emission of volatile organic materials (VOM) from metal lubricating operations and get relaxation of related record-keeping requirements. The company will continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). Production and emission limitations, as well as monitoring and recordkeeping conditions contained in the FESOP have prevented the facility from being a major source and will assure this status in the future. These conditions would be enforceable by both the State of Illinois and USEPA.

## **II. SOURCE DESCRIPTION**

Modine Manufacturing Company manufactures heat exchangers. Manufacturing process includes metal parts forming, product assembly and painting it with powder coating. The metal forming operations involve usage of solvent –containing lubricants. Powder coating is cured in the natural gas fired oven. Metal parts before assembly are cleaned in a degreaser.

## **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 will operate 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 to operate under 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 of volatile organic material (VOM) and 10 tons for an individual hazardous air pollutant (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 emissions of particulate matter (PM) from process and fugitive sources, e.g., 35 IAC, Part 212, Subpart B – Visible Emissions, Subpart K – Fugitive Particulate Matter and Subpart L – PM Emissions from Process Emission Units. Emission units emitting VOM are regulated by Part 218, e.g., degreasing operations by Subpart E – Solvent Cleaning, metal coating operations are subject to Subpart F – Coating Operations, emissions from lubricating operations on the metal forming is regulated by Subpart TT – Other Emission Units. The sources of VOM emissions are also subject to general VOM emission limitation found in 35 IAC 218.301 – Use of Organic Material.

The emissions of Nitrogen Oxides and Carbon Monoxide from fuel combustion sources are subject to the requirements of Part 217 Subpart B and Part 216 Subpart B, respectively.

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. The process emission units shall not exhibit emission of particulate matter exceeding 30% and fugitive emissions shall not cross property line as specified in Part 212, Subpart B and Subpart K. As explained, the metal cleaning operations are subject to 35 IAC Part 218 Subpart E, coating line (except liquid coating application) is subject to Subpart F and lubricating operations are subject to Subpart TT and emission limitations of 35 IAC 218.301 which requires limiting VOM emissions from each emission unit to less than 8 lbs per hour. 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 per year of VOM and 10 tons for an individual HAP and 25 tons for combined HAPs.

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.

ECB:VJB: