

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Hamilton Sundstrand  
Attn: Larry Carlson  
4747 Harrison Avenue  
P.O. Box 7002  
Rockford, Illinois 61125-7002

Application No.: 73100101

I.D. No.: 201030AEU

Applicant's Designation:

Date Received: June 2, 1999

Subject: FESOP

Date Issued: August 19, 1999

Expiration Date: November 21, 2001

Location: 2421-11th Street, Rockford

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of several natural gas fired Combustion units (Plant 1 boilers, and emergency generator); three engines with 3-way catalytic converters, a diesel fired emergency generator and an emergency fire pump; also Plant 1 surface coating operations and cleaning operations (vapor degreasing, cold cleaning, 4 paint spray booths, etc.); and miscellaneous operations (test cells, storage tanks, welding, packaging foam and cooling towers) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year each for nitrogen oxides, carbon monoxide and volatile organic materials). As a result the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. Emissions and operation of the external combustion units shall not exceed the following limits:

i.	Natural Gas Usage	E M I S S I O N S				
		NO <sub>x</sub>	CO			
<u>Item of Equipment</u>	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Combustion Units (Total)(Boilers, Heaters, etc.)	14.2	56.7	1420.0	2.84	284	0.6

<u>Item of Equipment</u>	<u>Horsepower Rating (HP)</u>	<u>Hours of Operation (Hr/Yr)</u>	<u>E M I S S I O N S</u>			
			<u>NO<sub>x</sub> (Gr/HP-Hr)</u>	<u>(T/Yr)</u>	<u>CO (Gr/HP-Hr)</u>	<u>(T/Yr)</u>
Emergency Generator	355	100	14.0	0.4	3.03	0.1
Emergency Fire Pump	185	100	14.0	0.2	3.03	0.1
Emergency Generator	248	75	20.0	0.4	35.0	0.7

iii. A. Natural gas consumption and emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO) and volatile organic materials (VOM) from the 14.9 mmBtu/hr engines shall not exceed the following limits:

Normal Operation:

<u>Emission Unit</u>	<u>Natural Gas Consumption</u>		<u>E M I S S I O N S</u>					
	<u>(mmcf/Mo)</u>	<u>(mmcf/Yr)</u>	<u>NO<sub>x</sub> (Lb/Hr)</u>	<u>(T/Yr)</u>	<u>CO (Lb/Hr)</u>	<u>(T/Yr)</u>	<u>VOM (Lb/Hr)</u>	<u>(T/Yr)</u>
Engine (Each)	----	-----	7.5	----	7.7	----	1.5	---
Engines (Total)	14.1	155.1	---	39.1	---	41.0	---	8.4

B. Only natural gas shall be burned in the engines.

C. Compliance with annual limits shall be determined from a running total of the current month and the previous 11 months of data.

D. Emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO) and volatile organic material (VOM) from the engines shall be controlled by 3-way catalytic converters, which shall be operated to provide 85%, 80%, and 50% control efficiency for NO<sub>x</sub>, CO and VOM respectively.

iv. Emissions of NO<sub>x</sub> and CO from miscellaneous activities (test cells, etc.) shall not exceed: 1.0 tons/year of NO<sub>x</sub>, 2.0 tons/year of CO.

b. Compliance with annual limits shall be determined from a running total of the current month and the previous 11 months of data.

3. Emissions and operation of the coating and cleaning operations shall not exceed the following limits:

<u>Process</u>	<u>Material</u>	<u>Usage Rate</u>		<u>Maximum</u>	<u>VOM</u>	
		<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>VOM Content* (Lb/Gal)</u>	<u>Emissions (Lb/Mo)</u>	<u>(T/Yr)</u>
Surface Coating	Coating and Thinner	40	200	7.0	280	0.7
Cleanup	MEK & Methanol	80	800	7.00	560	2.8
Cold Cleaning**	Cleaning Solvent	5000	50000	6.67	3335	16.7

<u>Process</u>	<u>Material</u>	<u>Usage Rate</u>		<u>Maximum</u>	<u>VOM</u>	
		<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>VOM Content*</u>	<u>Emissions</u>	
				<u>(Lb/Gal)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
IPA Cold Cleaning						
Degreasing	Isopropanol	198	1980	6.60	1307	6.5
Vapor Degreasing/ Cold Cleaning	1-bromopropane	400	4800	11.25	4500	27.0
	Cyclohexane	1200	14400	6.50	780	4.7

\* Minus water and exempt compounds.

\*\* Emissions assumed to be 10% of solvent used (based on in-house data)

4. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
5. This permit is issued based on negligible emissions of particulate matter from the coating operations. For this purpose emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
6. In the event that the operation of this source results in an odor nuisance the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
7. At all times the Permittee shall to the extent practicable, maintain and operate the equipment, including associated air pollution control equipment, in a manner consistent with good pollution control practices for minimizing emissions.
8. The Permittee shall maintain monthly records of the following items:
  - a. Usage rates of natural gas for Plant 1 Combustion Units (mmscf/mo).
  - b. Fuel consumption of all engines combined (mmcf/month).
  - c. Operation of each 3-way catalytic converter.
  - d. Hours of operation for the emergency pump and generators (hours/mo).
  - e. Usage rates, VOM and HAP content of all paints, thinners, cleaning solvents and degreasing solvents (gal/mo and lb VOM/gal).

9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

12. This permit is issued based on the cold cleaning and vapor degreasers meeting the specific operating requirements of 35 Ill. Adm. Code, Part E, Sections 215.181, 215.182 and 215.183.
13. The Permittee shall submit the following additional information with the Annual Emission Report, due May 1st of each year: type of fuel and fuel usage rates and paint/thinner/solvent usage for the prior calendar year. If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.
14. This permit is being issued based on the "patch test" process meeting the exemption requirements specified in 35 Ill. Adm. Code 215.181(b). As a result, the emissions from the "patch test" process shall not exceed 800 pounds in any calendar month.

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It should be noted that one paint spray booth has been added to this permit.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:RBS:jar\8

cc: Region 2

Attachment A

This attachment provides a summary of the maximum emissions from this facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is handling 56.7 mmscf/yr of natural gas and specified limits of operation of the emergency generators. The resulting maximum emissions are well below the levels, e.g., 100 tons/year of NO<sub>x</sub> at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent and control measures are more effective than required in this permit.

1a. Emissions from the external combustion units:

i.	<u>Item of Equipment</u>	Natural Gas Usage		E M I S S I O N S			
		<u>mmscf/Mo</u>	<u>mmscf/Yr</u>	NO <sub>x</sub>		CO	
				<u>lb/mo</u>	<u>tons/yr</u>	<u>lb/mo</u>	<u>tons/yr</u>
	Combustion Units	14.2	56.7	1420.0	2.8	284	0.6

The Emissions of NO<sub>x</sub> and CO are based on Standard AP-42 emission factors for natural gas and fuel oil combustion.

ii.	<u>Item of Equipment</u>	Horsepower Rating <u>(HP)</u>	Hours of Operation <u>(Hr/Yr)</u>	E M I S S I O N S			
				NO <sub>x</sub>		CO	
				<u>(Gr/HP-Hr)</u>	<u>(T/Yr)</u>	<u>(Gr/HP-Hr)</u>	<u>(T/Yr)</u>
	Emergency Generator	355	100	14.0	0.4	3.03	0.1
	Emergency Fire Pump	185	100	14.0	0.2	3.03	0.1
	Emergency Generator	248	75	20.0	0.4	35.0	0.7

iii. Natural gas consumption and emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO) and volatile organic materials (VOM) from the 14.9 mmBtu/hr engines shall not exceed the following limits:

Normal Operation:

Emission <u>Unit</u>	Natural Gas Consumption		E M I S S I O N S					
	<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	NO <sub>x</sub>	CO	VOM			
			<u>(Lb/Hr)</u>	<u>(T/Yr)</u>	<u>(Lb/Hr)</u>	<u>(T/Yr)</u>	<u>(Lb/Hr)</u>	<u>(T/Yr)</u>
Engine (Each)	----	-----	7.5	----	7.7	----	1.5	---
Engines (Total)	14.1	155.1	---	39.1	---	41.0	---	8.4

iv. Emissions of NO<sub>x</sub> and CO from miscellaneous activities (test cells, etc.) shall not exceed: 1.0 tons/year of NO<sub>x</sub>, 2.0 tons/year of CO.

b. Emissions from the coating and cleaning operations:

<u>Process</u>	<u>Material</u>	<u>Usage Rate</u>		<u>Maximum</u>	<u>VOM</u>	
		<u>(Gal/Mo)</u>	<u>(Gal/Yr)</u>	<u>VOM Content*</u>	<u>Emissions</u>	
				<u>(Lb/Gal)</u>	<u>(Lb/Mo)</u>	<u>(T/Yr)</u>
Surface Coating	Coating and Thinner	40	200	7.0	280	0.7
Cleanup	MEK & Methanol	80	800	7.00	560	2.8
Cold Cleaning**	Cleaning Solvent	5000	50000	6.67	3335	16.7
IPA Cold Cleaning						
Degreasing	Isopropanol	198	1980	6.60	1307	6.5
Vapor Degreasing/ Cold Cleaning	1-bromopropane	400	4800	11.25	4500	27.0
	Cyclohexane	1200	14400	6.50	780	4.7

\* Minus water and exempt compounds.

\*\* Emissions assumed to be 10% of solvent used (based on in-house data)

c. Emissions of VOM from miscellaneous activities (i.e., the gasoline, waste oil, fuel oil and JP-4), storage tanks, welding and packaging foam shall not exceed: 2.0 tons/year.

d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

217/782-2113

CERTIFIED MAIL

PERMIT DENIAL

March 20, 1998

Sundstrand Aerospace  
Attn: Larry Carlson  
4747 Harrison Avenue  
Rockford, Illinois 61125-7002

Application No.: 73100101  
I.D. No.: 201030AEU  
Applicant's Designation: PAINTBOOTH  
Received: February 6, 1998  
Operation of: Paint Booths  
Location: 2421 - 11st Street, Rockford

The Illinois EPA has reviewed your Application for Operating Permit for the above referenced project. The permit application is DENIED because the Illinois Environmental Protection Act, Section 9, and 35 Ill. Adm. Code 215.204 might be violated.

Pursuant to 35 IAC 215.204 J(3) VOM content of coatings may not exceed 3.5 lb/gal. Based on information available to the Illinois EPA at this time three of your six coatings currently exceed this limit.

This operating permit application is denied only for the new paint booths and for the above-mentioned deficiency. This action does not change the status or the expiration date of the current operating permit.

Please note, the issuance of this permit can't take place until after the current 215.206 rule changes, now in progress, have been promulgated.

If you have any questions concerning this denial, please contact Kevin Smith at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:KLS:jar

cc: Region 2  
Bob Sharpe, Enforcement

217/782-2113

PERMIT NOT REQUIRED

September 28, 1998

Sundstrand Aerospace  
Attn: Larry Carlson  
4747 Harrison Avenue  
Rockford, Illinois 61125-7002

Application No.: 73100101  
I.D. No.: 201030AEU  
Applicant's Designation: STODSOLCLN  
Received: September 18, 1998  
Construction/Operation of: Cold Cleaner  
Location: 2421 - 11th Street, Rockford

A review of the permit application referenced above for OPERATION of one stoddard solvent cold cleaner indicates that this project does not require a permit pursuant to 35 Ill. Adm. Code 201.146(v). This determination is based upon the information submitted to the Illinois EPA at this time.

If you have any questions or need any assistance regarding this matter, please contact Jason Schnepf at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Region 2

217/782-2113

October 15, 1999

Hamilton Sundstrand  
Attn: Larry Carlson  
4747 Harrison Avenue  
P.O. Box 7002  
Rockford, Illinois 61125-7002

I.D. No.: 201030AEU

Dear Mr. Carlson:

Enclosed is a revised permit letter which reflects only a change of ownership. Please note that if you have changed or intend to change this operation it will be necessary to apply for revision of your air pollution permit(s).

If you have any questions or require any assistance concerning these matters, contact Karen Luparell at 217/782-2113.

Very truly yours,

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:KJL:73100101:jar

Enclosure

cc: Region 2  
I.D. File  
Permit File