

PROJECT SUMMARY

Introduction

Hu-Friedy Manufacturing has voluntarily applied for a renewal of an operating permit for its Chicago dental instruments manufacturing facility in order to voluntarily incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by recordkeeping and reporting requirements to assure that the facility is operated as a non-major source.

Source Description

Hu-Friedy manufactures various dental instruments. The company operates three open top vapor degreasers, an adhesive application operation, electric heat treat/cure ovens, and assorted finishing operations. Additional equipment in the plant consists of surface grinders, sandblasters, and a laser-marking machine all controlled by dust collectors that are exempted from state permitting requirements. Raw materials such as stainless steel, aluminum, and plastic are formed, cleaned, hardened, and polished. The components are then assembled with adhesives and cured in ovens. The parts then go through a final finishing phase where grinding and buffing is performed. The final product is then marked and packaged for sale.

Emissions

The main air contaminants emitted for the facility are volatile organic material (VOM) and hazardous air pollutants (HAP), which are generated during solvent handling/usage from the degreasers, curing ovens, and adhesive application operation.

Negligible amounts of particulate matter and nitrogen oxide are emitted from the assorted finishing operations.

Applicable Emission Standards

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards at 35 Ill. Adm. Code, Subtitle B. The batch vapor degreasers are subject to the conditions of 40 CFR Part 63, Subpart T – National Emission Standards for Halogenated Solvent Cleaning and 35 Ill. Adm. Code 218.183. The Board has standards for sources of VOM emission. This site readily complies with all applicable Board standards.

Proposed Permit

The conditions of the proposed permit contain limitations and requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on usage of raw

materials. These limitations are consistent with the historical operation and capacity of the facility.

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

Request for Comments

It is the Illinois EPA's preliminary determination that the facility 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 permit with federally enforceable limits for this operation.

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 Ill. Adm. Code Part 166.

GMK:lsm