

MEMO

TO : File
CNH Industrial America LLC - Fargo Facility
Cass County, ND

FROM : Kari Thorsteinson *KAT*
Environmental Scientist
Division of Air Quality

RE : Draft Permit to Construct No. ACP-18214 v1.0
Synthetic Minor Emission Limits

DATE : April 3, 2024

CNH Industrial America LLC (CNH) manufactures heavy construction equipment and farm tractors in the City of Fargo in Cass County. The most significant emission units are the paint booths used for spray coating operations. Title V Permit to Operate (PTO) No. AOP-28387 (a.k.a. T5-M94002) was first issued on March 11, 1998. On July 6, 2022, the Department received an application from CNH requesting renewal of Title V PTO. In October 2022, the Department had a meeting with CNH to clarify permit questions and discuss the possibility of a synthetic minor permit. CNH indicated that they would like to start the process to get a synthetic minor permit and were instructed to submit a Permit to Construct (PTC) application documenting the CNH - Fargo Facility's potential to emit and requested limits. The PTC application was received on May 22, 2023. CNH requested synthetic minor limits of 95 tpy of particulate matter (PM), 95 tpy of volatile organic compounds (VOC), 24 tpy of combined hazardous air pollutants (HAPs), and 9 tpy of an individual HAP. All other emissions were below major source thresholds.

The new synthetic minor limits will make CNH a minor source for the criteria pollutants of PM and VOC and area source for combined and individual HAPs. The following regulations were evaluated for applicability with the proposed permit.

1. NSPS, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines applies to the emergency generator (EU 46) at the facility.
2. NSPS, Subpart E - Standards of Performance for Incinerators, does not apply to the incinerator (EU 47) because the charging rate is less than 50 tons per day.
3. NESHAP/MACT, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products no longer applies to the paint booths because the facility is an area source of HAPs.

4. NESHAP/MACT, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines applies to the emergency generator (EU 46) at the facility.
5. NESHAP/MACT, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters no longer applies to the boilers (EU 41 and 42) because the facility is an area source of HAPs.
6. NESHAP/MACT, Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources does not apply to the boilers (EU 41 and 42) because they are gas-fired boilers as defined by this subpart.

The Department proposes to issue the attached draft synthetic minor PTC after a 30-day public comment period. A synthetic minor PTO will be issued after this PTC goes into effect.

KMT:er

Attach: Draft Permit to Construct
 Permit to Construct Application