

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

NTN Bower Corp)
(Property Identification Number) PCB 17-
11-201-005-01) (Tax Certification)
)

NOTICE

Steve Santarelli
Illinois Department of Revenue
101 West Jefferson
Post Office Box 19033
Springfield, Illinois 62794

John Theirrault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Tammy Dalbello
711 N. Bower Rd.
Macomb, Illinois 61455

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board an **APPEARANCE** and **RECOMMENDATION OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: 
Vera Herst
Assistant Counsel
Division of Legal Counsel

DATED: October 19, 2016

Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

NTN Bower Corp)
(Property Identification Number) PCB 17-
11-201-005-01) (Tax Certification)
)

APPEARANCE

The undersigned, as one of its attorneys, hereby enters an APPEARANCE on behalf of Respondent,
Illinois Environmental Protection Agency.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: Vera Herst
Vera Herst
Assistant Counsel
Division of Legal Counsel

DATED: October 19, 2016

Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
(217)782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

NTN Bower Corp)
(Property Identification Number) PCB 17-
11-201-005-01) (Tax Certification)
)

**RECOMMENDATION OF THE ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY**

The Illinois Environmental Protection Agency ("Illinois EPA") hereby files its Recommendation pursuant to Section 125.204 of the regulations of the Illinois Pollution Control Board ("Board"), 35 Ill. Adm. Code 125.204.

1. On July 29, 2016, the Illinois EPA received a request from, NTN Bower Corp. (log number TC-136411, Exhibit A) for an Illinois EPA recommendation regarding the tax certification of water pollution control facilities pursuant to 35 Ill. Adm. Code 125.204.
2. The facility's address is: NTN Bower Corp.
711 N. Bower Rd.
Macomb, IL 61455

The proposed water pollution control facilities in this request are located in T6N, R2W, Macomb City Quad 2, in McDonough County, at the above street address and consist of the following:

A pretreatment system consisting of an oil/water separator, two 10,000-gallon batch reactor tanks with bentonite clay addition, two 4,000-gallon effluent storage tanks, a bag filter, and a 10 ft. filter press housed in a new building.

These facilities are used to pretreat wastewater to meet 40 CFR 433 standards, and to house pretreatment equipment that cannot be continuously open to the elements. They are further described in Exhibit A.

THIS FILING IS SUBMITTED ON RECYCLED PAPER

3. Section 11-10 of the Property Tax Code, 35 ILCS 200/11-10 (2014), and Section 125.200(a) of the Board's regulations, 35 Ill. Adm. Code 125.200(a), define "pollution control facilities" as:

any system, method, construction, device or appliance appurtenant thereto or any portion of any building or equipment, that is designed, constructed, installed or operated for the primary purpose of: eliminating, preventing, or reducing air or water pollution ...or treating, pretreating, modifying or disposing of any potential solid, liquid or gaseous pollutant which if released without treatment, pretreatment modification or disposal might be harmful, detrimental or offensive to human, plant or animal life, or to property.
4. In order to receive preferential tax treatment as pursuant to 35 ILCS 200/11-5 (2014), pollution control facilities must be certified as such by the Board, 35 ILCS 200/11-20 (2014) and 35 Ill. Adm. Code 125.200(a).
5. Upon receipt of a tax certification application, the Illinois EPA must file a recommendation on the application with the Board, 35 Ill Adm. Code 125.204(a).
6. Based on the information in the application and the purpose of the facility, it is the Illinois EPA's engineering judgment that the described facilities may be considered "pollution control facilities," pursuant to 35 Ill. Adm. Code 125.200(a), with the primary purpose of eliminating, preventing, or reducing water pollution, or as otherwise provided in 35 Ill. Adm. Code 125.200, and are eligible for tax certification from the Board.

WHEREFORE, the Illinois EPA recommends that the Board issue the requested

THIS FILING IS SUBMITTED ON RECYCLED PAPER

tax certification.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: 
Vera Herst
Assistant Counsel
Division of Legal Counsel

Dated: October 19, 2016

Illinois Environmental Protection Agency
1021 North Grand Ave. E.
P.O. Box 19276
Springfield, Illinois 62794-9276
217/782-5544

THIS FILING IS SUBMITTED ON RECYCLED PAPER

STATE OF ILLINOIS)
)
)
COUNTY OF SANGAMON)
)

CERTIFICATE OF SERVICE

I, the undersigned attorney at law, hereby certify that I have served on the date of October 19, 2016, the attached APPEARANCE and RECOMMENDATION OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, upon the following persons by First Class U.S. Mail, with proper postage or delivery charges prepaid:

Steve Santarelli
Illinois Department of Revenue
101 West Jefferson
P.O. Box 19033
Springfield, Illinois 62794

Tammy Dalbello
711 N. Bower Rd.
Macomb, Illinois 61455

[Electronic Filing]

Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite. 11-500
Chicago, Illinois 60601

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

/s/ Vera Herst
Assistant Counsel
Division of Legal Counsel
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276
217.782.5544
217.782.9143 (TDD)

THIS FILING IS SUBMITTED ON RECYCLED PAPER



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, ACTING DIRECTOR

Memorandum

To: Joanne Olson, Division of Legal Counsel
From: Alan Keller, Manager, Permit Section *AK*
Date: September 28, 2016
Re: NTN Bower Corp.
Recommendations of Tax Certification
Log # TC-136411
Property Identification Number 11-201-005-01

The Bureau of Water received a request on July 29, 2016 from NTN Bower Corp. for an Illinois EPA recommendation regarding the tax certification of water pollution control facilities pursuant to 35 Ill. Adm. Code 125.204. We offer the following recommendation.

The water pollution control facilities in this request include the following:

NTN Bower Corp.
711 N. Bower Rd.
Macomb, IL 61455

Macomb City Quad 2 Township, in McDonough County, Illinois

A pretreatment system consisting of an oil/water separator, two 10,000-gallon batch reactor tanks with bentonite clay addition, two 4,000-gallon effluent storage tanks, a bag filter, and a 10 ft³ filter press housed in a new building.

These facilities are further described in the enclosed applications and supporting documents.

Based on the information included in this submittal, it is our engineering judgment that the above proposed facilities may be considered "Pollution Control Facilities" under 35 IAC 125.200(a), with the primary purpose of eliminating, preventing, or reducing water pollution, or as otherwise provided in this section, and therefore eligible for tax certification from the Illinois Pollution Control Board. The Bureau of Water therefore recommends that the Board issue the requested tax certification for these facilities.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

Subject: TC-136411 – NTN Bower Corp.

Page 1 of 1

Reviewed By: Mark E. Liska

Date: 9/28/2016

The Agency received a tax certification for NTN Bower Corp. under 35 IAC 125. The tax form will be judged based on definitions in 35 IAC 125.200.

Form received July 29, 2016 for the construction of a pretreatment system consisting of an oil/water separator, batch reactor tanks, and bag filters. The previous pretreatment system and building was torn down and this new system was built in a new building in the same place as the old building.

The Application for Certification form lists the entire pretreatment system and the building it is housed in.

1. The pretreatment system will be approved for certification, as it has the primary purpose of pretreating wastewater to meet 40 CFR 433 standards.
2. The building housing the pretreatment system will be approved for certification, as it has the primary purpose of housing pretreatment equipment which cannot be continuously open to the elements.

Action: Approve Tax Credits

Manufacturing Process Information:

Please provide information on the manufacturing process and materials on which pollution control facility is used, including each major piece of equipment associated with the pollution control facility (or low sulfur dioxide emission coal fueled device).

Description of the Process:

See Attached Process Description

Materials Used in the Process:

The industrial wastewater generated by NTN Bower's operations varies due to the assortment of products produced. The wastewater could contain oil based metal machining fluids, synthetic coolants, semi-synthetic coolants, detergents from washers, solids and detergent from tumbling operations and any other fluids used in the facility. For design purposes, these wastewater are not continuous or steady state so they must be treated as a batch operation.

Pollution Control Facility Information:

Please provide a narrative description of the pollution control facility (or low sulfur dioxide emission coal fueled device), and an explanation of why its primary purpose is to eliminate, prevent or reduce pollution. State the type of control facility, as well as a narrative description and a process flow diagram describing the pollution control facility. Include an average analysis of the influent and effluent of the control facility stating the collection efficiency, if applicable.

Describe the Pollution Control Facility (or Low Sulfur Dioxide Emission Coal Fueled Device):

Pretreatment System which consists of a 100 GPM oil/water separator, two 10,000 gallon batch reactor tanks with bentonite clay addition, two 4,000 gallon effluent storage tanks, a bag filter, a 10ft3 filter press and all of the pumps, pipes and attachments necessary to pre-treat 9,600 GPD DAF and 16,000 GPD DAF of industrial wastewater. This permittee also discharges 7,000 GPD of non-contact wastewater and sanitary wastewater for a total of 635 P.E. The permittee discharges these wastewaters tributary to the City of Macomb STP via an on-site sewer connection.

Describe the Primary Purpose of the Pollution Control Facility (or Low Sulfur Dioxide Emission Coal Fueled Device):

Pretreatment of wastewater from the manufacturing operation. Wastewater is pumped to either the oil/water separator (OSW) for oil removal or bypasses the OWS and is pumped directly to a reactor tank for batch treatment. Samples of treated batch is analyzed for total suspended solids (TSS) and oil & grease (O&G), and ph. If within limits, then the wastewater is pumped through bag filters for discharge to the sanitary sewer. Sludge is pumped to sludge tank filtrate is treated.

Identify the statute or regulation (federal or state), or local ordinance, if any, requiring the installation of the subject pollution control facility (or low sulfur dioxide emission coal fueled device).

United States EPA reg. 40 CFR 438 - Metal Products and Machinery point source category, the regulatory limits of the effluent discharged from the NTN Bower Industrial wastewater treatment is Total Suspended Solids (TSS) 62 mg/1 and Oil & Grease (O&G) 46 mg/1. City of Macomb Pretreatment ord. #2198. 40 CFR 433 metal finishing point source category-chemical etching

Nature of Contaminants or Pollutants:

List air contaminants or water pollution substances released as effluents to the manufacturing processes. Also list the final disposal of any contaminants removed from the manufacturing processes.

Contaminant or Pollutant	Material Retained, Captured or Recovered	
	Description	Disposal or Use
Oil	Used Oil	Recycled offsite
Sludge	Sludge from treated waste water	Non-hazardous waste - Land filled
Filtrate	From sludge	Holding tank-discharged to sanitary sewer after treatment

Note: Contaminant or pollutant means that which is removed from the process by the pollution control facility.

NTN-Bower Corporation
Industrial Wastewater
May 2014

PROCESS DESCRIPTION

Starting with steel alloy parts (tubes, wire, coils, etc.) and supplied parts, NTN-Bower manufactures bearings. The finished products include precision roller and ball bearings for automotive, construction/heavy equipment and industrial applications, components and assembly of track-type tractor cartridges and assembled truck engine fan housings and clutch arms. The process may include shearing, pressing, sawing, grinding, honing, washing, heat treating, quenching, testing, blasting, tumbling, assembly, coating with rust preventative, removing rust, inspection, and packaging. Since parts are manufactured to customer specification, not all parts are processed the same.

Auxiliary operations at Bower include reverse osmosis for treatment of city supplied water, cooling towers with non-contact cooling water to regulate the temperature of various equipment such as quench oil reservoirs, air compressors and dryers, natural gas fired boilers for comfort heating, HVAC systems for employee comfort, tool room, maintenance, and industrial wastewater treatment plant.

NTN-Bower waste water handling includes infrastructure for sanitary/domestic waste, process/industrial waste, and storm water.

SANITARY/DOMESTIC WASTE

Sanitary waste from the restrooms, showers, and break rooms is discharged into the City of Macomb sanitary sewer system. Non-sanitary waste water from boiler blow down, waste from reverse osmosis (RO), air compressor condensate, dryer condensate, wastewater from washing gloves, and cooling tower bleed off are also discharged into the sanitary sewer. It is estimated that 7,000 gallons of RO waste is discharged daily.

PROCESS/INDUSTRIAL WASTE

Process/industrial wastewater is treated in the industrial wastewater treatment system before being discharged to the sanitary sewer. Process/industrial wastewater includes:

Washers

To remove machining fluids and quench oils, parts are washed. Some of the washers are single stage while others are three stage. Each washer has a process waste sump to handle overflow, any rinse water, and the periodic dumping of the bath. Washer tank volumes range from 200 gallons to 1,600 gallons. The Race Grind washer's 800 gallon bath and two 400 gallon baths are typically replaced monthly. The CAT Pin washer's 300 gallon, 420 gallon, and 550 gallon baths are typically replaced every six weeks. The other baths are replaced on an as needed basis. Materials currently used in the baths are Rilco 1281, Star Guard 3132, Star Guard 3315, and Cerfa Kleen 5398 which are added as needed to make a fresh bath or replenish the existing bath. Other materials may be used to maintain quality requirements.

NTN-Bower Corporation
Industrial Wastewater
May 2014

Rust Removal Operation

Rust is removed from some parts at the Caustic Tank. There are two baths containing caustic solutions (Quaker Formula 698 LQ and Quaker Formula LFE) and two baths containing rust preventive (Star Guard 3132). The part is rinsed with water after being dipped into each bath. The rinse water is discharged to process waste. The solutions in the baths will be shipped offsite for proper disposal, if needed.

Burn Booth

A quality test is referred to as the burn booth. A sample part is dipped in alcohol, nitric acid solution, and hydrochloric acid solution and rinsed with water between dips then a rust preventative is applied. The part is visually inspected for signs of grinding burns. There are currently five burn booth onsite. Each burn booth is inside of a typical laboratory fume hood with five dip tanks. When the baths are no longer effective, the liquid is pumped out of each tank and discharged to the wash rack to process waste.

Wash Rack

There are designated areas in the facility where floor cleaning and mop water are discharged to process waste. It is estimated that approximately 200 gallons is discharged daily.

Met Laboratory

The drains from the metallurgy laboratory are connected to the process waste line.

Parts Washer

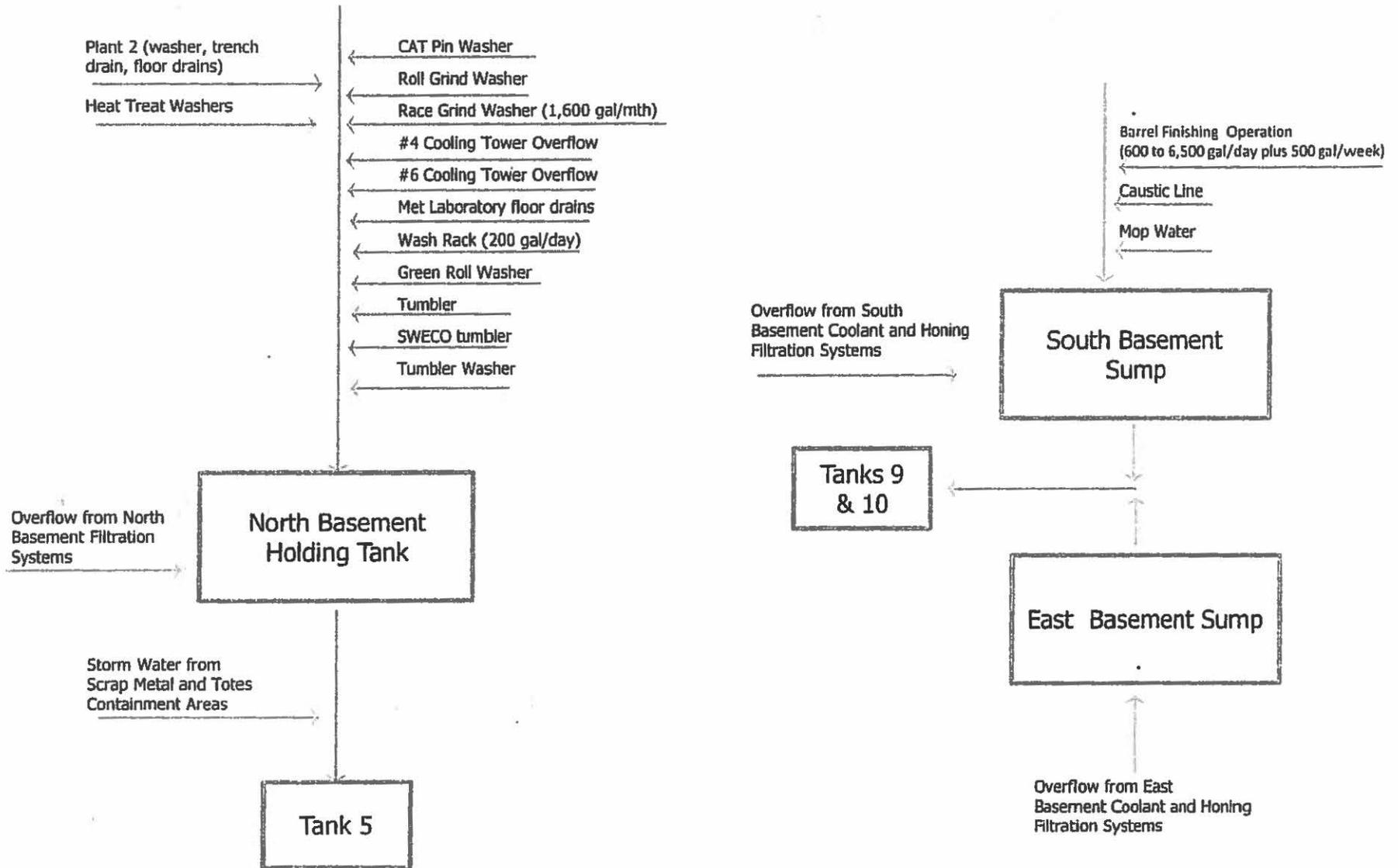
There are several solvent-based parts washers located throughout the plant. These are serviced by an outside contractor who removes the used solutions for recycling offsite and replaces with clean solutions.

Process Waste

The process waste is collected in one of three areas of the plant before being pumped to the wastewater treatment system. The North Basement has a 1,000 gallon holding tank for wastewater as well as the cutting oil filtration system. The wastewater from the washers, tumblers operations, wash rack, and Plant 2 are collected in the North Basement holding tank for discharge to process waste. Plant 2's process waste may include coolant, washer solutions, and water from the wash rack. The South Basement receives the wastewater from the barrel finishing operation, rust removal operation, and mop water and houses one of the coolant filtration system and a honing oil filtration system. The third area is the East Basement houses another coolant and honing oil filtration system. Any of the basements may discharge overflowed materials to the wastewater treatment system.

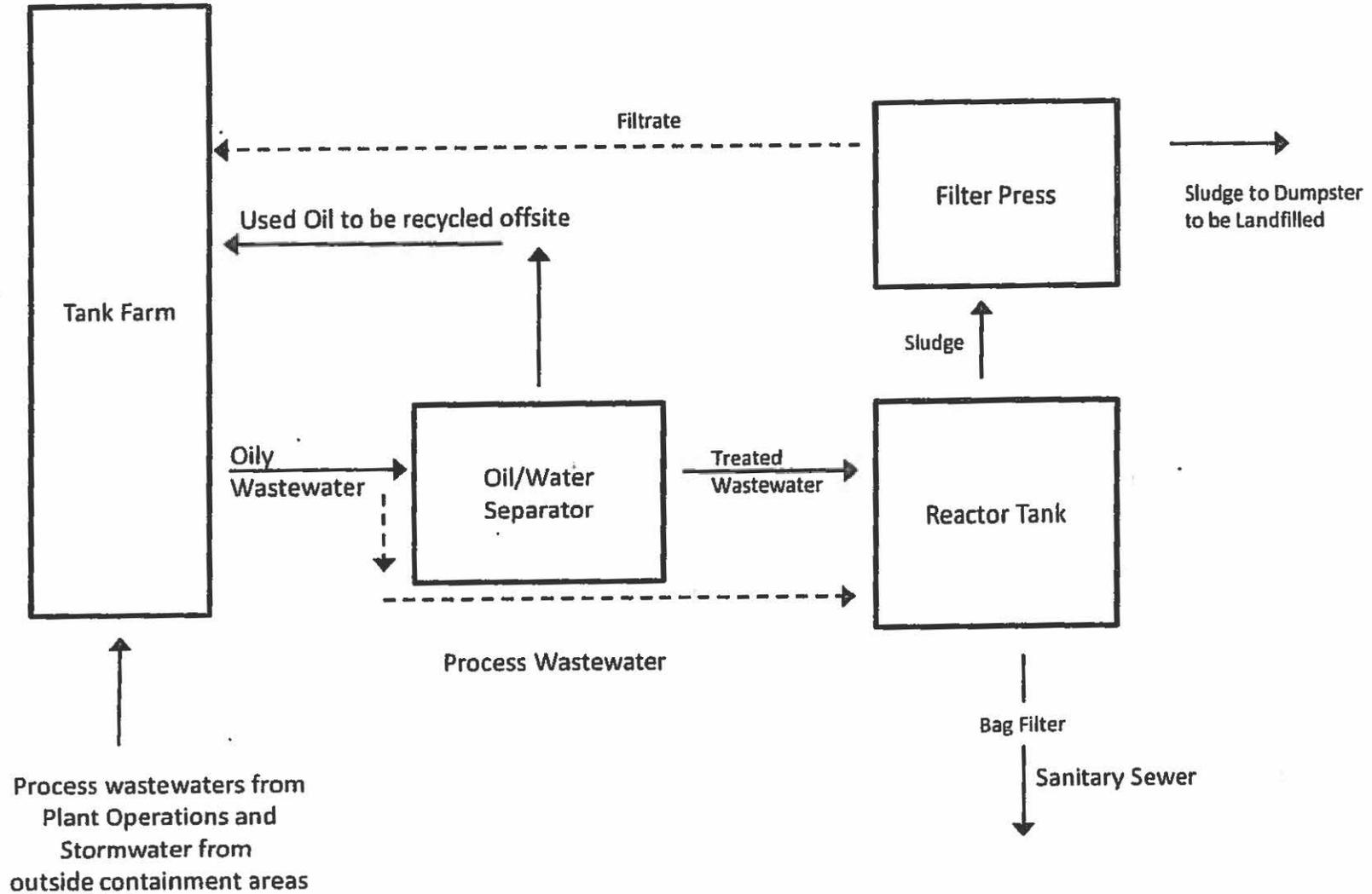


Process Waste Flow Diagram





Wastewater Treatment Plant Process



NTN • BOWER

July 25, 2016

Illinois EPA
Attention: Al Keller, Permit Section
Division of Water Pollution Control
1021 North Grand Avenue East, P.O. Box 19276
Springfield, IL 62794-9276

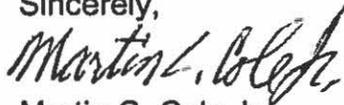
RECEIVED
JUL 29 2016
EPA
BOW/WPC/PERMIT SECTION

Dear Mr. Keller:

Attached is an Application for Certification (Property Tax Treatment) Pollution Control Facility. NTN-Bower previously had this exemption. We tore down the previous structure and replaced it with a new facility in the same spot. I was told by Darren Lacrone at the EPA (217-782-0610) that we need to obtain a new EPA certification due to the facility being replaced.

Feel free to contact me if you need any further information.

Sincerely,



Martin C. Cole Jr.
Controller
NTN-Bower Corp.
Ph. 309-837-0403