



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 20 2007

REPLY TO THE ATTENTION OF:

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Lakenan
Site Manager
Celanese Ltd.
1989 Old Naples Road
Merdosia, Illinois 62665

Dear Mr. Lakenan:

Enclosed are a file stamped Consent Agreement and Final Order (CAFO) and an Administrative Consent Order which resolves Celanese, Ltd. CAA Docket No. CAA-05-2007-0026. As indicated by the filing stamp on its first page, we filed the CAFO with the Regional Hearing Clerk on SEP 21 2007.

Pursuant to paragraph 32 of the CAFO, Celanese, Ltd. must pay the \$87,607 civil penalty within 30 days of the date the CAFO was filed, SEP 21 2007. The check must display the case docket number, CAA-05-2007-0026, and the billing document number, 2750703A029.

Please direct any questions regarding this case to Sabrina Argentieri, Associate Regional Counsel, (312) 353-5485.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Brent Marable".

Brent Marable, Chief
Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure

cc: Ray Pilapil, Acting Section Chief
Compliance and Enforcement Section Bureau of Air
Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:) Docket No. CAA-05-2007-0026
)
Celanese Ltd.) Proceeding to Assess a Civil
1989 Old Naples Road) Penalty under Section 113(d)
Meredosia, Illinois 62665) of the Clean Air Act,
) 42 U.S.C. § 7413(d)
)
Respondent.)

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d), and Sections 22.1(a) (2), 22.13(b), and 22.18(b) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (Consolidated Rules) as codified at 40 C.F.R. Part 22 (2004).
2. Complainant is the Director of the Air and Radiation Division, United States Environmental Protection Agency, Region 5 (U.S. EPA).
3. Respondent is Celanese Ltd., a Texas limited partnership doing business in Illinois.
4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative

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action may be commenced and concluded simultaneously by the issuance of a Consent Agreement and Final Order (CAFO).

40 C.F.R. § 22.13(b) (2004).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to entry of this CAFO and the assessment of the specified civil penalty, and agrees to comply with the terms of the CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Celanese admits the jurisdictional allegations in this CAFO, and neither admits nor denies the factual allegations in this CAFO.

8. Celanese waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

Statutory and Regulatory Background

9. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.

10. The regulation at 40 C.F.R. § 70.6(b)(1) specifies that

all terms and conditions in a permit issued under a Title V program are enforceable by U.S. EPA under the CAA.

11. On December 4, 2001, U.S. EPA promulgated final approval of the Illinois Title V program, which became effective on November 30, 2001. 66 Fed. Reg. 62946.

12. Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), authorizes the Administrator to initiate an enforcement action whenever, among other things, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of Title V of the CAA, or any rule promulgated, issued or approved under Title V of the CAA.

13. On February 21, 1980, U.S. EPA approved 35 Illinois Administrative Code (IAC) Part 215, as part of the federally enforceable SIP for Illinois. 45 Fed. Reg. 11472. This Part contains standards and limitations for emissions of organic material and volatile organic material (VOM).

14. 35 IAC 215.301 states that no person shall cause or allow the discharge of more than 3.6 Kg/Hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in Sections 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

15. The Administrator of U.S. EPA (the Administrator) may assess a civil penalty of up to \$27,500 per day of violation up to a total of \$220,000 for Title V permit violations that occurred from January 31, 1997 through March 15, 2004, and may assess a civil penalty of up to \$32,500 per day of violation up to a total of \$270,000 for violations that occurred after March 15, 2004 under Section 113(d)(1) of the CAA, 42 U.S.C. § 7413(d)(1), and 40 C.F.R. Part 19 (2004).

16. Section 113(d)(1) of the CAA limits the Administrator's authority to matters where the first alleged date of violation occurred no more than 12 months prior to initiation of the administrative action, except where the Administrator and Attorney General of the United States jointly determine that a matter involving a longer period of violation is appropriate for an administrative penalty action.

17. The Administrator and the Attorney General of the United States, each through their respective delegates, have determined jointly that an administrative penalty action is appropriate for the period of violations alleged in this CAFO.

Factual Allegations

18. Celanese owns and operates an emulsions manufacturing facility at 1989 Old Naples Road, Meredosia, Illinois. The facility manufactures vinyl acetate/ethylene emulsion products and adhesive resin bases. Celanese purchased portions of the

Meredosia facility from National Starch & Chemical Company (National Starch) on February 4, 2005.

19. On November 6, 2002, Illinois Environmental Protection Agency (IEPA) issued a Title V permit, Application No. 96030068 (Title V permit) to National Starch. This permit was transferred to Celanese after the February 4, 2005 purchase. Condition 7.1.6 of the Title V permit prohibited VOM emissions from the ethylene-vinyl acetate (EVA) process in excess of 15.6 tons/year. This limitation was to ensure that the construction and/or modification addressed in the Title V permit does not constitute a new major source or modification. The facility exceeded Condition 7.1.6 of the Title V permit EVA VOM limitation from at least February 4, 2005, through July 2006.

20. Celanese submitted an application for a revised EVA construction permit on January 13, 2006, in which Celanese sought a revised federally enforceable permit limitation. IEPA issued the revised construction permit on July 25, 2006. Celanese also submitted an application for a Title V permit renewal, on February 5, 2007, to reconcile its Title V permit limits with the revised construction permit limitations. Celanese received a determination of completeness from IEPA on February 21, 2007.

21. Condition 3.2.3 of Celanese's Title V permit states that for each organic material emission unit that uses organic material, e.g., mixer or printing line, the Permittee shall comply with the

applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

22. Section 7.1.3(c) of Celanese's Title V permit states that each process or operation identified in Condition 7.1.2 is subject to 35 IAC 215.301 or 215.302.

23. Condition 7.1.2 identifies WBA-11, WBA-12, LCR-22, PRL-42, and PRL-45 as emission units, and Condition 3.1.2 identifies the Ethylene Pressure Tanks as an "insignificant activity" as that term is used under the Title V program.

24. Vinyl acetate, ethyl acetate, heptane, and vinyl decanoate are photochemically reactive materials emitted from certain emission units at the Meredosia facility.

25. Celanese submitted Excess Emissions, Monitoring Equipment Downtime and Miscellaneous Reporting Forms to the IEPA reporting the following releases:

Date	Emission Unit	Pollutant	Quantity	Duration
March 1, 2005	WBA-12	vinyl acetate	3110 lbs	8 hours
April 28, 2005	WBA-12	vinyl acetate	156 lbs	15 minutes
June 24, 2005	PRL-45	vinyl acetate	200 lbs	unknown
June 30, 2005	LCR-22	vinyl acetate heptane ethyl acetate	1935 lbs 32 lbs 14 lbs	47 minutes
July 27, 2005	PRL-42	vinyl acetate vinyl decanoate ethyl acetate	3110 lbs 385 lbs 3140 lbs	15 minutes

August 20, 2005	WBA-12	vinyl acetate	360 lbs	15 minutes
June 1, 2006	WBA-11	vinyl acetate	631 lbs	8.17 hours
September 1, 2006	Ethylene Pressure Tanks	ethylene	3663 lbs	3 hours

26. On October 12, 2005, U.S. EPA issued to Celanese a notice of violation alleging that Celanese violated 35 IAC 215.301 by emitting VOM in excess of eight lb/hr as indicated in paragraph 14, above.

27. On several occasions between December 15, 2005 and April 18, 2007, representatives of U.S. EPA and Celanese have met and discussed the Notice of Violation and other regulatory and permit violations.

28. Celanese violated Section 502(a) of the Act, 42 U.S.E. § 7661A(A), 35 IAC 215.301, and Conditions 3.2.3, 7.1.3(c), and 7.1.6 of its Title V permit.

Alleged Violations

29. U.S. EPA alleges that by emitting VOMs at a rate in excess of 8 lbs/hour as described in Paragraph 25 above, Celanese violated Section 502(a) of the Act, 42 U.S.C. § 7661a(a), 40 C.F.R. § 70.7(b), 35 IAC 215.301, and Conditions 3.2.3, 7.1.3 (c) and 7.1.6 of its Title V Permit.

30. Celanese's operations in violation of Condition 7.1.6 of its Title V permit constitute violations of its Title V permit, Section 502 of the CAA and 40 C.F.R. § 70.7(b).

31. Celanese's violations of section 502 of the CAA and of 40 C.F.R. § 70.7(b), 35 IAC 215.301 and its Title V permit subjects Celanese to civil penalties under Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3).

Civil Penalty

32. Based on analysis of the factors specified in Section 113(e) of the CAA, 42 U.S.C. § 7413(e), the facts of this case, and Celanese's cooperation and good-faith efforts to come into compliance, U.S. EPA has determined that an appropriate civil penalty to settle this action is \$87,607.

33. Celanese must pay the \$87,607 civil penalty by cashier's or certified check payable to the "Treasurer, United States of America," within 30 days after the effective date of this CAFO.

34. Celanese must send the check to:

U.S. Environmental Protection Agency
Region 5
P.O. Box 70753
Chicago, Illinois 60673

35. A transmittal letter, stating Respondent's name, complete address, the case docket number, and the billing document number must accompany the payment. Respondent must write the case docket number and the billing document number on the face of the check. Respondent must send copies of the check and transmittal letter to:

Attn: Regional Hearing Clerk, (E-19J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

Attn: Compliance Tracker, (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

Sabrina Argentieri, (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3511

36. This civil penalty is not deductible for federal tax purposes.

37. If Celanese does not pay timely the civil penalty, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States' enforcement expenses for the collection action under Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

38. Interest will accrue on any overdue amount from the date payment was due at a rate established under 31 U.S.C. § 3717. Celanese will pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. Celanese will pay a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue according to Section 113(d)(5) of

the CAA, 42 U.S.C. § 7413(d)(5). This nonpayment penalty will be 10 percent of the aggregate amount of the outstanding penalties and nonpayment penalties accrued from the beginning of the quarter.

Final Statement

39. This CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in the Violations section of this CAFO.

40. This CAFO does not affect the right of U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violation of law.

41. This CAFO does not affect Celanese's responsibility to comply with the CAA and other applicable federal, state and local laws, and regulations. Except as provided in paragraph 39 above, compliance with this CAFO will not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by Complainant.

42. Celanese certifies that, as of the effective date of this Order, it is complying fully with 35 Illinois Admin. Code § 215.301 and its Revised Construction Permit No. 96070015 for the Batch Chemical Processor Emulsion Polymer System (EVA Department), issued on July 25, 2006, as amended by Construction Permit No. 06010079 for the Cooling Loop Project for EVA Department, issued on July 25, 2006.

43. This CAFO constitutes an enforcement response as that term is used in "U.S. EPA's Clean Air Act Stationary Source Civil Penalty Policy" to determine Celanese's full compliance history under Section 113(e) of the CAA, 42 U.S.C. § 7413(e).

44. The terms of this CAFO bind Celanese and its successors, and assigns.

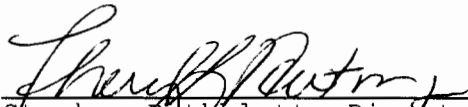
45. Each person signing this consent agreement certifies that he or she has the authority to sign this consent agreement for the party whom he or she represents and to bind that party to its terms.

46. Each party agrees to bear its own costs and attorneys' fees in this action.

47. This CAFO constitutes the entire agreement between the parties.

U.S. Environmental Protection Agency, Complainant

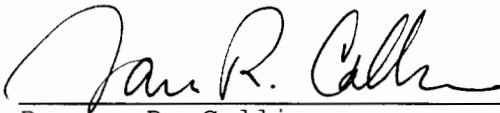
9/18/07
Date



Stephen Rothblatt, Director
Air and Radiation Division
U.S. Environmental Protection
Agency, Region 5 (A-18J)

Celanese Ltd., Respondent

9/13/07
Date



Darren R. Collins
Director, Manufacturing
Celanese Ltd.

CONSENT AGREEMENT AND FINAL ORDER

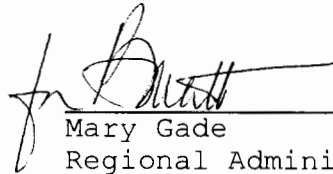
Celanese Ltd.

Docket No. CAA-05-2007-0026


Final Order

It is ordered as agreed to by the parties and as stated in the consent agreement, effective immediately upon filing of this CAFO with the Regional Hearing Clerk. This final order disposes of this proceeding pursuant to 40 C.F.R. § 22.18.

9-20-07
Date



Mary Gade
Regional Administrator
U.S. Environmental Protection
Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3511

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US EPA REGION 5
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In the Matter of: Celanese Ltd.
Consent Agreement and Final Order
Docket No: **CAA-05-2007-0026**

CERTIFICATE OF MAILING

I, Betty Williams, certify that I hand delivered the original of the Consent Agreement and Final Order (CAFO), docket number **CAA-05-2007-0026** to the Regional Hearing Clerk, Region 5, United States Environmental Protection Agency, and that I mailed correct copies by first-class, postage prepaid, certified mail, return receipt requested, to Celanese Ltd. and Katherine D. Hodge, Esq. Counsel by placing them in the custody of the United States Postal Service addressed as follows:

John E. Lakenan, Site Manager
Celanese Ltd.
1989 Old Naples Road
Meredosia, IL 62665

Katherine D. Hodge, Esq.
Hodge Dwyer Zeman
3150 Roland Avenue
P.O. Box 5776
Springfield, IL 62705-5776

I also certify that a copy of the CAFO was sent by first class mail to:

Ray Pilapil, Manager
Compliance and Enforcement Section Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

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US EPA REGION 5
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on the 21st day of September 2007.

Betty Williams
Betty Williams, Secretary
AECAS (IL/IN)

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CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0005 8920 2429

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:)	
)	
Celanese Ltd.)	Administrative Consent Order
1989 Old Naples Road)	
Meredosia, Illinois)	EPA-5-07-113(a) IL-04
)	
Proceeding Under)	
Section 113(a)(1)(A))	CAA-05-2007-0026
of the Clean Air Act,)	
42 U.S.C. § 7413(a)(1)(A))	

Administrative Consent Order

1. The Director of the Air and Radiation Division, United States Environmental Protection Agency (U.S. EPA), Region 5, is issuing this Order to Celanese Ltd. (Celanese) under Section 113(a)(1)(A) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(1)(A).

Statutory and Regulatory Background

2. Each state must submit to the Administrator of U.S. EPA a plan for attaining and maintaining the National Ambient Air Quality Standards under Section 110 of the Act, 42 U.S.C. § 7410.

3. On February 21, 1980, U.S. EPA approved 35 Illinois Administrative Code (IAC) Part 215, as part of the federally enforceable SIP for Illinois. 45 Fed. Reg. 11472. This Part contains standards and limitations for emissions of organic material and volatile organic material (VOM).

4. 35 IAC 215.301 states that no person shall cause or allow the discharge of more than 3.6 Kg/Hr (8 lbs/hr) of organic material

into the atmosphere from any emission source, except as provided in Sections 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemical reactive material.

5. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.

6. On December 4, 2001, U.S. EPA promulgated final approval of the Illinois Title V program, which became effective on November 30, 2001. 66 Fed. Reg. 62946.

7. Under Section 113(a)(3)(A) of the Act, 42 U.S.C. § 7413(a)(3)(A), the Administrator of U.S. EPA may issue an order requiring compliance to any person who has violated or is violating a requirement or prohibition of Title V of the Act, or any rule promulgated, issued or approved under Title V of the Act and an approved SIP. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

8. Celanese owns and operates an emulsions manufacturing facility at 1989 Old Naples Road, Meredosia, Illinois. The facility manufactures vinyl acetate/ethylene emulsion products and adhesive resin bases. Celanese purchased portions of the Meredosia facility from National Starch & Chemical Company

(National Starch) on February 4, 2005.

9. On November 6, 2002, the Illinois Environmental Protection Agency (IEPA) issued a Title V permit, Application No. 96030068 (Title V permit) to National Starch. That permit was transferred to Celanese after the February 4, 2005 purchase. Condition 7.1.6 of the Title V permit prohibited VOM emissions from the ethylene-vinyl acetate (EVA) process in excess of 15.6 tons/year. The purpose of this limitation was to ensure that the construction and/or modification addressed in the Title V permit does not constitute a new major source or modification. The facility exceeded Condition 7.1.6 of the Title V permit EVA VOM limitation from at least February 4, 2005 through July 2006.

10. Celanese submitted an application for a revised EVA construction permit on January 13, 2006, in which Celanese requested a revised federally enforceable permit limitation. IEPA issued the revised construction permit on July 25, 2006. Celanese also submitted an application for a Title V permit renewal on February 5, 2007, to reconcile its Title V permit limits with the revised construction permit limitations. Celanese received a determination of completeness from IEPA on February 21, 2007.

11. Condition 3.2.3 of Celanese's Title V permit states that for each organic material emission unit that uses organic material, e.g., mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or

219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

12. Condition 7.1.3(c) of Celanese's Title V permit states that each process or operation identified in Condition 7.1.2 is subject to 35 IAC 215.301 or 215.302.

13. Condition 7.1.2 identifies WBA-11, WBA-12, LCR-22, PRL-42, and PRL-45 as emission units, and Condition 3.1.2 identifies the Ethylene Pressure Tanks as an "insignificant activity" as that term is used under the Title V program.

14. Vinyl acetate, ethyl acetate, heptane, and vinyl decanoate are photochemically reactive materials emitted from certain emission units at the Meredosia facility.

15. Celanese submitted Excess Emissions, Monitoring Equipment Downtime and Miscellaneous Reporting Forms to the IEPA reporting the following releases:

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August 20, 2005	WBA-12	vinyl acetate	360 lbs	15 minutes
June 1, 2006	WBA-11	vinyl acetate	631 lbs	8.17 hours
September 1, 2006	Ethylene Pressure Tanks	ethylene	3663 lbs	3 hours

16. On October 12, 2005, U.S. EPA issued to Celanese a notice of violation alleging that Celanese violated 35 IAC 215.301 by emitting VOM in excess of 8.0 lb/hr as indicated in Paragraph 15, above.

17. On several occasions between December 15, 2005 and April 18, 2007, representatives of U.S. EPA and Celanese have met and discussed the Notice of Violation and other regulatory and permit violations.

18. U.S. EPA alleges that Celanese violated Section 502(a) of the Act, 42 U.S.C. § 7661A(A), 40 C.F.R. § 52.23, 35 IAC 215.301, and Conditions 3.2.3, 7.1.3(c), and 7.1.6 of its Title V permit.

Emission Reduction and Compliance Program

19. By the effective date of this order, Celanese must achieve, demonstrate and maintain compliance with the 35 IAC 215.301 at its Meredosia, Illinois facility.

20. Within sixty (60) days of the effective date of this Order, Celanese shall install interim reactor catch tanks for all open operating reactors.

21. Within fourteen (14) days of the effective date of this Order, Celanese shall implement appropriate measures to reduce emissions of VOM from the vinyl acetate monomer (VAM) unloading areas, including pressurizing the rail cars when unloading the VAM and returning any displaced vapors via rail car to the vendor that distributed the VAM, where the vapors will be incinerated by

a thermal destructive device.

22. Celanese shall accelerate the implementation of the leak detection and repair (LDAR) requirements of 40 C.F.R. Part 63, Subpart FFFF, Miscellaneous Organic Chemical Manufacturing (MON) NESHAP. Celanese shall implement the LDAR requirements under 40 C.F.R. § 63.2480 within eight (8) weeks of the effective date of this Order.

23. Celanese shall decommission Reactor 12 at the Meredosia facility within eight (8) weeks of the effective date of this Order.

24. Celanese shall close the open vent to the atmosphere of the EVA monomer slow add tank at the Meredosia facility to eliminate emissions from the tank within twelve (12) weeks of the effective date of this Order.

25. Celanese shall decommission Reactors 11 and 13 at the Meredosia facility no later than the end of the first quarter of 2008.

General Provisions

26. This Order does not affect Celanese's responsibility to comply with other local, state, and federal laws and regulations.

27. This Order does not restrict U.S. EPA's authority to enforce the Illinois SIP, Celanese's Title V permit, or any section of the Act.

28. Nothing in this Order limits U.S. EPA's authority to seek

appropriate relief, including penalties under Section 113 of the Act, 42 U.S.C. § 7413, for Celanese's violation of the Illinois SIP and its Title V permit.

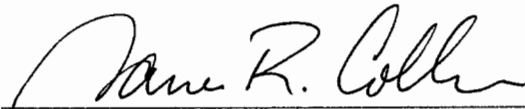
29. Failure to comply with this Order may subject Celanese to penalties of up to \$32,500 per day for each violation under Section 113 of the Act, 42 U.S.C. § 7413, and 69 Fed. Reg. 7121 (Feb. 13, 2004) (amending 40 C.F.R. Part 19).

30. The terms of this Order are binding on Celanese, its assignees and successors. Celanese must give notice of this Order to any successors in interest, prior to transferring ownership, and must simultaneously verify to U.S. EPA, at the above address, that Celanese has given the notice.

31. Celanese agrees to the terms of this Order.

32. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate one year from the effective date, provided that Celanese has complied with all terms of the Order throughout its duration.

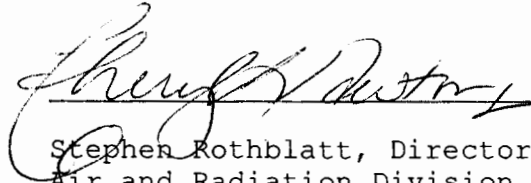
9/13/2007
Date



Warren R. Collins
Director, Manufacturing
Celanese Ltd.

9/18/07

Date



Stephen Rothblatt, Director
Air and Radiation Division

Enclosure

CERTIFICATE OF MAILING

I, Betty Williams, certify that a original copy of the Administrative Consent Order (ACO) EPA-5-07-113(a)-IL-04, was sent by Certified Mail, Return Receipt

Requested, to:

John E. Lakenan, Site Manager
Celanese Ltd.
1989 Old Naples Road
Meredosia, IL 62665

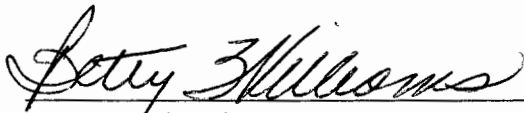
Katherine D. Hodge, Esq.
Hodge Dwyer Zeman
3150 Roland Avenue
P.O. Box 5776
Springfield, IL 62705-5776

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REGIONAL HEARING CLERK
US EPA
2007 SEP 21 AM 10:06

I, also certify that a copy of the (ACO) EPA-5-07-113(a)-IL-04 was sent by, First-Class Mail to:

Ray Pilapil, Manager
Compliance and Enforcement Section Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62702

on the 21st day of September 2007.


Betty Williams, Secretary
AECAS (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000589201992

CERTIFIED MAIL RECEIPT NUMBER: 70010320000589202429