

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for a
Construction Permit Application From
Engineered Polymer Solutions, Inc. for a
Resin Manufacturing System in
Marengo, Illinois

Site Identification No.: 111065AAS
Application No.: 06100033

Illinois EPA Contacts:

Permit Analyst: Kevin Hecht
Community Relations Coordinator: Brad Frost

Important Dates

Application Received: October 12, 2006
Comment Period Begins: April 6, 2008
Comment Period Closes: May 6, 2008

I. Introduction

Engineered Polymer Solutions, Inc. has applied for a construction permit for a new resin manufacturing system at its coating manufacturing plant in Marengo, Illinois. The requested permit would also set federally enforceable limits so that the plant would not be major for emissions of Hazardous Air Pollutants (HAP) and would not be subject to the emission control requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63 Subpart FFFF. As these limits would be included in a construction permit for new equipment at the plant, these conditions would be enforceable by both the State of Illinois and the U.S. Environmental Protection Agency.

II. Project Description

The plant produces emulsions and resins that are used in paints and other coatings. In the resin manufacturing system, the base materials for the desired polymer or resin are “cooked” or combined to form a resin material that will provide the desired qualities (adhesion, weather resistance, surface finish, etc.) for the coating manufacturers that are customers of the plant. The new resin manufacturing system would be used to produce intermediate products that are not high emission solvent based products.

Engineered Polymer Solutions has also requested that the permit constrain the plant to minor source status so as to not be subject to the NESHAP which would otherwise take effect on May 10, 2008. This is consistent with current status of the plant based on its actual emissions of hazardous air pollutants, as reported by Engineered Polymer Solutions.

III. Emissions

The requested permit would limit VOM emissions from the new resin manufacturing system to 39 tons per year. The permit would also limit overall emissions of HAP at the source in order to keep HAP emissions below major source levels, i.e., less than 10 tons per year of any individual HAP and less than 25 tons per year of all HAPs combined, thus the source would not be subject to the emission control requirements of the NESHAP for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63 Subpart FFFF.

IV. Applicable Emission Standards

All emission sources in Illinois must comply with the Illinois Pollution Control Board’s emission standards. The Board’s emission standards represent the basic requirements for sources in Illinois. The Board has standards for emission of NO_x, SO₂, CO, VOM, and PM. This plant readily complies with all applicable Board standards.

As a result of this permit action, the plant would not be subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP).

V. Draft Permit

The conditions of the permit would contain limitations and requirements to ensure that the plant will be operated as a non-major source for emissions of HAPs. The permit would limit the HAP emissions from the plant so that it would not be a major source for HAPs, and thus not subject to the emission control requirements of the NESHAP for Miscellaneous Organic Chemical Manufacturing, 40 CFR 63 Subpart FFFF.

The permit conditions would also establish appropriate compliance procedures, including testing, monitoring, and recordkeeping 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 is properly controlling emissions.

The provisions of the construction permit would eventually be incorporated into an operating permit for the plant.

VI. Request for Comments

It is the Illinois EPA's preliminary determination that the application for permit 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 that would limit the emission of HAPs from the plant.

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 164.

KTH:kth