

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Huntsman International, Inc. for a
Federally Enforceable State Operating Permit (FESOP) for
Thermoplastic Polyurethane Production Plant
Ringwood, Illinois

Site Identification No.: 111811AAU
Application No.: 04030040

Schedule

Public Comment Period Begins: February 15, 2012
Public Comment Period Closes: March 16, 2012

Illinois EPA Contacts

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I. INTRODUCTION

An application has been voluntarily submitted by the Huntsman International, Inc. to modify their current state operating permit(s) for their thermoplastic polyurethane production facility in order to voluntarily incorporate federally enforceable limits. These limits would prevent the above 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 requirements to assure that the plant is operated as a non-major source. Unlike the site's current operating permit(s), these conditions would be enforceable by both the State of Illinois and USEPA.

II. SOURCE DESCRIPTION

Huntsman International, Inc. operates a thermoplastic polyurethane production plant in Ringwood, Illinois. The thermoplastic Polyurethane production is produced using polyesters, polyols, diisocyanates, catalysts, urethane intermediates, and various lubricating, stabilizing and intermediate powders. In addition, a small amount of solvent is periodically employed as a carrier for the catalyst for certain products. Basic operations for the TPU production at Huntsman include storage tanks, blend tanks extruders, and grinders

Facility emission sources include TPU Production;

- TPU Grinding/Milling/Blending Operation with two (2) Dust Collectors;
- Manual and Automatic Powder Addition Processes;
- Pneumatic Conveying and Bagging Systems;
- Seventeen (17) Liquid Raw Material Storage and Day Tanks; and
- One (1) 0.35 mmBtu/hour Natural Gas-Fired Burnoff Oven with Afterburner

These units are sources of emissions because emissions generated from thermoplastic polyurethane production are volatile organic material (VOM) and hazardous air pollutants (HAP).The primary pollutants of concern are HAPs.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The board has standards for sources of Volatile Organic Material (VOM) and hazardous air pollutants (HAPs). The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern is hazardous air pollutants (HAP) which is created by the thermoplastic polyurethane production. The facility has limited their throughput that will keep the VOM emissions below the major source threshold level of 10 ton per year for single HAP and 25 ton per year for combined total HAPs.

Other emissions of Volatile Organic Material (VOM) are also emitted.

V. CONTENTS OF THE PERMIT

The permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit would also set limitations on requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on thermoplastic polyurethane production facility emissions. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to

demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

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 IAC Part 166.