

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
(SIGNIFICANT MODIFICATION)

Afton Chemical Corporation
501 Monsanto Avenue, Sauget, St.Clair County, 62201

Illinois EPA ID Number: 163121AAB

Application Number: 951200712
Application Type: Significant Modification

Start of Public Comment Period: May 6, 2010

Close of Public Comment Period: June 5, 2010

Permit Engineer/Technical Contact: Anatoly Belogorsky, 217/782-2113

Community Relations/Comments Contact: Brad Frost, 217/782-7027

(This Project Summary generally describes the source and explains the draft permit. This document has been prepared pursuant to Section 39.5(8)(b) of the Illinois Environmental Protection Act, which requires "a statement that sets forth the legal and factual basis for the draft CAAPP permit conditions.")

I. INTRODUCTION

This source has applied for a significant modification of the Clean Air Act Permit Program (CAAPP) operating permit. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by Title V of the federal Clean Air Act and Section 39.5 of Illinois' Environmental Protection Act. The conditions in a CAAPP permit are enforceable by the Illinois Environmental Protection Agency (Illinois EPA), the USEPA, and the public. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A CAAPP permit contains conditions identifying the applicable state and federal air pollution control requirements that apply to a source. The permit also establishes emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit. Further explanations of the specific provisions of the draft CAAPP permit are contained in the attachments to this document, which also identify the various emission units at the source.

This statement of basis contains only information related to the following areas subject to significant modification of the CAAPP permit: subsections 3.1.1, 3.1.2 and 3.1.3 clarify addition of storage tanks or activities had been omitted from the original CAAPP application; allowable emissions established for fee purposes (Condition 5.5.1) have been changed; and subsection 7.28 incorporates newly installed gasoline storage tank.

II. GENERAL SOURCE DESCRIPTION

a. Nature of source

Afton Chemical Corporation is located at 501 Monsanto Avenue in Sauget, Illinois. The source manufactures various miscellaneous organic chemicals, including lubricant additives, for the petroleum industry. In addition, the source packages these materials for transportation off-site for further processing.

b. Major source status

This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and SO₂ emissions.

III. NEW SOURCE REVIEW / TITLE I CONDITIONS

This draft permit contains terms and conditions that address the applicability of permit programs for new and modified sources under Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the draft permit by T1, T1R, or T1N. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this draft permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new conditions or revise such conditions in a Title I permit, those conditions are consistent with the information provided in the CAAPP application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source. In addition, the draft permit requires the source to certify its compliance status on an annual basis. Also, the Annual Emission Reports and latest inspection report have been reviewed which indicate compliance.

V. PROPOSED ILLINOIS EPA ACTION / REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested by the Illinois EPA for the draft or proposed permit, pursuant to 35 IAC Part 252 and Sections 39.5(8) and (9) of the Illinois Environmental Protection Act. A final decision on the draft or proposed permit will not be made until the public, affected states, and USEPA have had an opportunity to comment. The Illinois EPA is not required to accept recommendations that are not based on applicable requirements. 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.

ATTACHMENT 1: Summary of Changes to Insignificant Activities (subsections 3.1.1, 3.1.2 and 3.1.3)

Table 1 (Section 3 of the draft permit)

Units Added to CAAPP		
Name/Designation	Description	Identified Subsection
Tank 35-0190	Ethylene Glycol Storage Tank, Unit 258	3.1.1
Tank 35-0818	Ethylene Glycol Storage Tank, Unit 268	3.1.1
Tanks 35-0903, 35-0904, and 35-0905	High Flash Aromatic Solvent Tanks, Unit 268	3.1.1
North diesel storage tank	Unit 283	3.1.2
Emergency generator and emergency fire pump	N/A	3.1.3 [35 IAC 201.210(a)(15) and 35 IAC 201.210(a)(16)]

ATTACHMENT 2: Summary of Changes to Section 7

Table 1 (Section 7.28 of the draft permit)

Emission Unit	
Name	Gasoline Storage Tank
Description	560-gallons storage capacity
Date Constructed	2007
Emission Control Equipment	Control Practices: submerged loading pipe
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 219.122(b) • 40 CFR 63.11116(a)
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • T1N conditions have been established to limit monthly and annual gasoline throughput along with monthly and annual VOM emissions
Other Emission Limits	N/A
Non-applicability (reason)	<ul style="list-style-type: none"> • 40 CFR Part 60, Subpart Kb: pursuant to 40 CFR 60.110b(d)(6) a gasoline storage tank located at gasoline service stations is not subject to Subpart Kb • 35 IAC 219.120, 219.121, 219.122(a) and 212.123: the tank volume is less than 40,000 gallons • 35 IAC 219.581 and 219.582: not a bulk gasoline plant or bulk gasoline terminal • 35 IAC Part 219 Subpart G "Use of Organic Material": organic material is not in "use" in the storage tank • Not subject to CAM: potential pre-control emissions are less than major source threshold • 40 CFR 63.11116 (other than 40 CFR 63.11116(a)): monthly gasoline throughput is limited to less than 10,000 gallons
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • N/A
Emissions Monitoring	<ul style="list-style-type: none"> • N/A
Operational Monitoring	<ul style="list-style-type: none"> • N/A

Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> • Monthly and annual gasoline throughput • Monthly and annual VOM/HAP emissions • Documentation on submerged loading pipe and capacity/dimensions of the storage tank
Reporting	
Deviation Reporting	<ul style="list-style-type: none"> • Deviation from requirements (operation with submerged loading pipe) and emission/production limits shall be reported to the IEPA within 30 days of such occurrence
Other Reporting	N/A
Other Information	
Footnotes	N/A