

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for a  
Construction Permit Application From  
Sun Chemical in  
Northlake, Illinois  
for a  
Plant Expansion Project

Site Identification No.: 031471AAE  
Application No.: 10030026

Illinois EPA Contacts:

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Important Dates

Application Received: March 8, 2010  
Comment Period Begins: September 2, 2010  
Comment Period Closes: October 2, 2010

## I. Introduction

Sun Chemical has applied for a construction permit for a Plant Expansion Project at its ink manufacturing plant in Northlake. The project would involve installation of a variety of new ink manufacturing equipment. The changes to the plant would enable increased production of printing ink accompanied by increases in emissions.

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed Sun Chemical's application and made a preliminary determination that the application meets applicable requirements. However before issuing a permit, the Illinois EPA is holding a public comment period to receive comments on the proposed issuance of a permit for the project. The Illinois EPA has also prepared a draft version of the air pollution control construction permit that it would propose to issue for this project. The Illinois EPA is making this draft permit available for public review and for comments on the terms and conditions of the draft permit.

## II. Application Description

At its Northlake plant, Sun Chemical manufactures printing ink and "varnish", which is the base material for printing ink prior to addition of pigment and thinning solvent. The plant emits volatile organic material (VOM) and hazardous air pollutants (HAP) because of the organic solvents that are a component of printing ink and varnish. Some of the organic solvent is lost as emissions to the atmosphere in the manufacturing process and in the handling of materials. These emissions would be controlled by work practices and implementation of a leak detection and repair program, as well as appropriate testing, monitoring, and recordkeeping to assure ongoing compliance.

Sun Chemical has requested a construction permit for installation of blending vessels, mixers, ball mills, and other new equipment that would enable increased production at its Northlake plant. This would enable Sun Chemical to consolidate ink manufacturing operations at the plant, improving the efficiency of manufacturing operations.

## III. Emissions

With the proposed project, the potential VOM emissions from the plant, as limited by permit, would be 46.2 tons per year. The potential HAP emissions from the plant, as limited by permit, would be 8.80 tons per year.

This project would not be a major modification subject to 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM). This is because the net increase in VOM emissions would only be 36.39 tons/year, which is less than 40 tons/year.

The plant would not be a major source for HAPs, i.e. permitted HAP emissions would be less than 10 tons per year of any individual HAP and less than 25 tons per year total for HAPs. Accordingly, the plant is not subject to the requirements of any National Emission Standards for Hazardous Air Pollutants (NESHAP) for major sources, e.g. 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart FFFF, Miscellaneous Organic Chemical Production and Processes (the MON rule) or Subpart HHHHH, Miscellaneous Coating Manufacturing (MCM MACT),

#### 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<sub>x</sub>, SO<sub>2</sub>, CO, VOM, and PM. This plant readily complies with all applicable Board standards.

With this project, the plant would continue to be a minor source of HAPs and not be subject to any federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for major sources. The plant would also not be subject to the requirements of 40 CFR Part 63 Subpart CCCCCC, Paints and Allied Products Manufacturing, which may apply to non-major sources of HAPs. This is because the plant would not process, use, or generate "material containing HAP" for purposes of this NESHAP (i.e., benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight, as defined by 40 CFR 63.11607).

#### V. Draft Permit

The conditions of the permit would contain limitations and requirements to ensure that the project would not be a major modification for emissions of VOM and the plant is a non-major source for emissions of HAPs. For this purpose, the permit would set limitations on the amount of VOM and HAP used and emitted by the various departments at the plant.

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.

#### VI. Request for Comments

It is the Illinois EPA's preliminary determination that the application for a 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 for the Plant Expansion Project.

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.

KTH:kth