

## Project Summary

### I. INTRODUCTION

This source has applied for a renewal of the Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The W.R. Grace & Co. – Conn. Darex Container Products is located at 6050 West 51st Street in Chicago. The source is a can sealant manufacturer, they fabricate container sealants and lubricant fluids.

### II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
01 10 SLC Solvent Storage Tanks	Storage Tank 42 5,000 gal	1/87	None
	Storage Tank 69 36,000 gal	1/87	None
	Storage Tank 70 36,000 gal	1/87	None
	Storage Tank 71 36,000 gal	1/87	None
	Storage Tank 72 36,000 gal	1/87	None
	Storage Tank 73 11,000 gal	1/87	None
	Storage Tank 74 11,000 gal	1/87	None
	Storage Tank 75 15,000 gal	1/87	None
	Storage Tank 76 15,000 gal	1/87	None
02 Banbury Mixer	Mixer Including Associated Equipment	1940	Dust Collector Fabric Filters
03 SLC Solvent Mixers & SLC/RM Duo-Mode Mixer & SW Solvent Base Struthers	SLC Mixer SW0	Pre 1972	None
	SLC Mixer SW1	Pre 1972	None
	SLC Mixer SW2	Pre 1972	None
	SLC Mixer SW3	Pre 1972	None
	SLC Mixer SW4	Pre 1972	None
	SLC Mixer SW5	Pre 1972	None
	(SLC Mode) Mixer SW6 (Duo-Mode Mixer)	4/2002	None

Wells Mixers	(RM Mode) Mixer SW6 (Duo-Mode Mixer)	4/2002	Dust Collector (Manway Hood Exhaust Filter)
	SW Mixer SW7	4/2002	None
	SW Mixer SW8	4/2002	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
04 10 SLC Blend/Storage Tanks & 2 WT Solvent Base Weigh Tanks	Tank BST-1	1/39	None
	Tank BST-2	1/39	None
	Tank BST-3	1/39	None
	Tank BST-4	1/39	None
	Tank BST-5	1/39	None
	Tank BST-6	1/39	None
	Tank BST-7	1/39	None
	Tank BST-8	1/39	None
	Tank BST-9	1/39	None
	Tank BST-10	1/39	None
	Weigh Tank WT-1	4/2002	None
	Weigh Tank WT-2	4/2002	None
05 SLC Packaging & SBNBP Packaging	SLC Tank Truck Bulk	1/39	None
	SLC Non-Bulk Packaging	1/39	None
	SBNBP Solvent Base Non-Bulk Packaging Station	4/2002	None
06 SLC RAK Tank	Tank SLC-RAK	1/60	None
07 Natural Gas Boilers	North American Boiler	2/74	None
	Cleaver Brooks Boiler	2/74	None
	Ray Boiler #1	2/74	None
	Ray Boiler #2	2/74	None
08 Fugitive VOM Emissions	69 Valves	Pre 1972	None
	61 Flanges	Pre 1972	None
	18 Pumps	Pre 1972	None
	9 OELs	Pre 1972	None
09 ASP Sodasorb Process Equipment	Baghouse-CB1	4/2002	None
	Lime Storage Silo-A1	4/2002	None
	Baghouse-CB2	4/2002	None
	Lime Bin-A2	4/2002	None
	Mixer-A3	4/2002	None
	Oven-A4 (6.09 mmBtu/hr)	4/2002	None
	Crusher-A5	4/2002	CB4 Main Dust Collector 1
	Sifter-A6	4/2002	
	Pulverizer-A7	4/2002	
	CB5 Fines Recycle Baghouse	4/2002	None
	CB3 Fines Baghouse	4/2002	None
REG Fines Bin-A13	4/2002	None	

Emission Unit	Description	Date Constructed	Emission Control Equipment
	IND Fines Bin-A14	4/2002	None
	Weigh Belt/Wetting Belt Conveyor-A8	4/2002	CB6 Main Dust Collector 2
	Product Storage Bins-A9	4/2002	
	Pre-Pak Machines-A10	4/2002	
	Canister Pack Machine-A11	4/2002	
	Bulk Packaging-A12	4/2002	
	Overhead Conveyor Transfer Points	4/2002	

### III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	29.28
Sulfur Dioxide (SO <sub>2</sub> )	0.09
Particulate Matter (PM)	1.67
Nitrogen Oxides (NO <sub>x</sub> )	15.02
HAP, not included in VOM or PM	---
<b>Total</b>	<b>46.06</b>

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal 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 permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

### 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.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

## V. PROPOSED PERMIT

### CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

### Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits.

These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

## VI. 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 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 166.