

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary for an Application from
Engineered Polymer Solutions, Inc. for
Renewal of the Federally Enforceable State Operating Permit (FESOP) for
Latex Paint and Coatings Manufacturing
Wheeling, Illinois

Site Identification No.: 031324ACO
Application No.: 81100051

Schedule

Public Comment Period Begins: November 13, 2008
Public Comment Period Closes: December 13, 2008

Illinois EPA Contacts

Permit Analyst: John Blazis
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Engineered Polymer Solutions, Inc. has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for Latex Paint and Coatings Manufacturing plant located at 1191 South Wheeling Road, Wheeling, IL. This plant requires an air pollution control operating permit because it is a source of air emissions. The Illinois EPA has prepared a draft of the renewed permit that it proposes to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

Engineered Polymer Solutions, Inc. facility In Wheeling, IL is a manufacturer of latex based paints and coatings that use water as the primary solvent. The emission units at this plant that require an operating permit include storage tanks, mixers, mixing vessels controlled by a dust collector, let-down tanks, holding/mixing tanks, wash/wastewater tanks and filling lines for the production of latex paints and coatings. These units are sources of emissions because the manufacturing of paints and coatings releases some of the materials solvents that are mainly water and some organic solvents. The paint and coating manufacturing process emits volatile organic material (VOM). These organic solvents also contain minor components that are considered hazardous air pollutants (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 100 tons for VOM, 100 tons for PM-10, 10 tons for an individual HAP and 25 tons for combined HAPs.

The proposed permit has been revised to increase the production and emission limits in condition 6 through more accurate methods for determining emissions. The potential VOM emissions increased by 9.4 tons per year, and potential HAP emissions by 3.6 tons per year.

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 specific standards for units that emit volatile organic material in the greater Chicago area. The application shows that the plant is in compliance with applicable state and federal air emission standards.

V. CONTENTS OF THE PERMIT

The construction and operating permits that the Illinois EPA is proposing to issue identifies the specific emission standards that apply to the emission units at the plant. The conditions of the permits are intended to ensure that the source continues to comply with applicable emission standards.

The renewed 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. As explained, the paint and coating manufacturing is subject to material process limits that establish practically enforceable limits on the emissions. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permits would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permits would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 100 tons for PM-10, 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 permits would also set limitations on the VOM from the plant to below 25 tons per year. These limitations are consistent with the historical operation of emission units at the plant.

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 permits 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 renewal of its permit. The Illinois EPA is therefore proposing to renew 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.