

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for a  
Construction Permit Application From  
Sun Chemical in  
Kankakee, Illinois  
for an  
Emission Reduction Project

Site Identification No.: 091804AAF  
Application No.: 06060001

Illinois EPA Contacts:

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Important Dates

Application Received: June 20, 2007  
Comment Period Begins: April 2, 2008  
Comment Period Closes: May 2, 2008

## I. Introduction

Sun Chemical has applied for a revision to a construction permit for its Emission Reduction Project to include Modified Varnish Production at its plant in Kankakee, Illinois. The revisions to the permit allow increased production of raw material grade varnish. The revision would also set federally enforceable limits so that the plant would not be major for emissions of Hazardous Air Pollutants (HAP) as a result and would not be subject to the emission control requirements of 40 CFR Part 63, Subpart HHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing. As these limits would be included in a construction permit for new equipment at the plant, these conditions would be enforceable by both the State of Illinois and the U.S. Environmental Protection Agency.

## II. Application Description

The plant manufactures printing ink and “varnish”, which is the base material for printing ink prior to addition of pigment and thinning solvent. In 2006, Sun Chemical received a permit for construction of an Emission Reduction Project with addition of pollution control equipment, improved production practices, and other emission control measures for the existing ink production equipment to enhance the level of control for HAP emissions so that it would not be a major source of HAPs.

Sun Chemical has requested a revised construction permit for the Emission Reduction Project to increase the permitted production of raw material grade varnish while continuing to maintain emission limitations that constrain the plant to minor source status for HAPs. The principle HAP used at the plant is toluene, which is needed to produce inks that meet established specifications.

The revised construction permit would allow increased production of raw material grade varnish while maintaining the status of the plant as a minor source for emissions of HAPs.

## III. Emissions

The principle HAP emitted from the plant is toluene. The revised permit would limit the HAP emissions from the plant so that it would not be a major source for HAPs, i.e., less than 10 tons per year of toluene and any other individual HAP and less than 25 tons per year of all HAPs combined, and thus not subject to the emission control requirements of the NESHAP.

## 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 permit action, the plant would continue to not be subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP).

#### V. Draft Permit

The conditions of the permit would contain limitations and requirements to ensure that the plant will be operated as a non-major source for emissions of HAPs. The revised permit would limit the HAP emissions from the plant so that it would not be a major source for HAPs, and thus not subject to the emission control requirements of 40 CFR Part 63, Subpart HHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing. The permit would set limitations on the amount of HAP used and emitted by 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.

The provisions of the revised construction permit would eventually be incorporated into the plant's CAAPP permit.

#### VI. Request for Comments

It is the Illinois EPA's preliminary determination that the application for a revised 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 revised permit for the Emission Reduction 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 Ill. Adm. Code Part 164.

KTH:kth