

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Henkel Corporation for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
Adhesive Manufacturing
Elgin, Illinois

Site Identification No.: 031438AAY
Application No.: 91110016

Schedule

Public Comment Period Begins: November 5, 2008
Public Comment Period Closes: December 5, 2008

Illinois EPA Contacts

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I. INTRODUCTION

Henkel Corporation has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its adhesive manufacturing plant located at 1345 Gasket Drive, Elgin, 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

Henkel's Elgin facility is a manufacturer of water-based and polyurethane adhesives. The emission units at this plant that require an operating permit include boilers and space heaters, water-based adhesive processes (mixing tanks, storage tanks), polyurethane adhesives processes (reactors, blending tanks and storage tanks controlled by scrubber). These units are sources of emissions because the manufacturing of adhesives releases solutions containing organic solvents. The adhesive manufacturing process emits volatile organic material (VOM). These 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.

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 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 adhesive 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.