

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Seneca Petroleum Company, Inc. for  
Federally Enforceable State Operating Permit (FESOP) for  
12460 South New Avenue  
Lemont, Illinois

Site Identification No.: 197803AAB  
Application No.: 02120011

Schedule

Public Comment Period Begins: April 9, 2010  
Public Comment Period Closes: May 9, 2010

Illinois EPA Contacts

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## **I. INTRODUCTION**

Seneca Petroleum Company, Inc. currently operates under federally enforceable state operating permit (FESOP) which was issued five years ago. The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before issuing 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**

Seneca Petroleum Company operates asphalt processing plant. Raw asphalt is delivered via pipeline, by the tank trucks and railroad cars are stored in the heated storage tanks. The Seneca Petroleum Company produces specification products used in road asphalt pavement and roofing products by blending asphalt with additives, e.g., water, oils, polymers and ground tire rubber. Final products are shipped off by the tank trucks. Natural gas is used in indirect asphalt heaters.

This facility is considered a single source with Korall Corporation, I.D. No. 197803ABD, located at 305 South New Avenue, Lemont. The source has elected to obtain separate FESOPs for these locations.

## **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 to operate 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. 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 for both programs. 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 10 tons for an individual Hazardous Air Pollutant (HAP) and 25 tons for combined HAPs and potential emissions of Volatile Organic Material (VOM) to less than 100 tons per year.

#### **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 sources of volatile organic material and and Particulate Matter (PM). The source VOM emissions are subject to the general Particulate Matter (PM) and VOM emission limitation found in 35 IAC. To avoid applicability of control requirements of 35 Ill. Adm. Code Part 218, Subpart TT the plant requested to limit potential to emit of VOM to less than 25 tons/year.

The application shows that the plant is in compliance with applicable state and federal emission standards.

#### **V. CONTENTS OF THE PERMIT**

The permit 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 this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit sets limitations on asphalt throughput and fuel usage. These limitations are consistent with the historical operation and capacity of the facility. The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major source thresholds of 10 tons for an individual HAP and 25 tons for combined HAPs and 100 tons for VOM. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

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 permit 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.