

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
BUREAU OF AIR, PERMIT SECTION  
1021 N. GRAND AVENUE EAST  
P.O. BOX 19276  
SPRINGFIELD, ILLINOIS 62794-9276  
217/782-2113

Project Summary  
for a Construction Application from  
Daubert Chemical Company for Three Product Storage Tanks  
Polymer, Adhesive, Industrial Coating Manufacturing Process  
Chicago, Illinois

Site Identification No.: 031821AAS  
Application No.: 08110037

Date Received: November 24, 2008

Schedule

Public Comment Period Begins: 04/15/2009  
Public Comment Period Closes: 05/15/2009

Illinois EPA Contacts

Permit Analyst: Jocelyn Stakely  
Community Relations Coordinator: Brad Frost

## **I. INTRODUCTION**

Daubert Chemical Company has submitted a construction permit application for three product storage tanks for their polymer, adhesive, industrial coating, and metal working manufacturing facility. The construction of this unit requires a permit from the Illinois EPA because of their emissions.

Accordingly, the Illinois EPA has prepared a draft of the air pollution control construction permit that it would propose to issue for this project. The permit is intended to identify the additional control requirements that apply to the proposed project and to set necessary limitations on those emissions. However, before issuing this permit, the Illinois EPA is holding a public comment period to receive comments on the proposed issuance of this permit and the terms and conditions of the draft permit.

## **II. SOURCE DESCRIPTION**

Daubert Chemical Company is a manufacturer of polymer, adhesive, industrial coating, and metal working. The emission units at this plant that require an operating permit include natural gas fired boilers, polymer manufacturing process, adhesive manufacturing process, industrial coating manufacturing process, metal working manufacturing process, V-DAMP unit, and storage tanks. The primary emissions of concern are generated from manufacturing processes and equipment are volatile organic material (VOM) and hazardous air pollutants (HAP).

## **III. GENERAL DISCUSSION**

The limitations established by the construction permit 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 limitations on the operation of a source restrict the potential emissions of the source.

The source has actual emissions which are below the levels at which the plant would be considered a major source under Section 112(g) Clean Air Act. However, in the absence of federally enforceable limitations, the plant 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 undergo Section 112(g) review, as would otherwise be required.

The construction permit limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons of VOM, 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 source is subject to the general requirements of 35 Ill. Adm. Code 215.301: Use of Organic Material. 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 would continue to identify the specific emission standards that apply to the emission units at the plant.

The permit would also set limitations on requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on natural gas fired boilers, polymer manufacturing process, adhesive manufacturing process, industrial coating manufacturing process, metal working manufacturing process, V-DAMP unit, and storage tanks emissions. 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 modification is not triggering major source status for HAP and does not need to undergo Section 112(g) review. 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.

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 issuance of its permit. The Illinois EPA is therefore proposing to issue 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.