

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Daubert Chemical Company  
for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
Polymer, Adhesive, Industrial Coating Manufacturing Plant  
Chicago, Illinois

Site Identification No.: 031821AAS  
Application No.: 73090167

Schedule

Public Comment Period Begins: April 3, 2013  
Public Comment Period Closes: May 3, 2013

Illinois EPA Contacts

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## **I. INTRODUCTION**

Daubert Chemical Company has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for their Polymer, Adhesive, and Industrial Coating Manufacturing Plant. This facility 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 revising 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**

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

Four (4) natural gas-fired boilers (8.3 mmBtu/hour, each),  
Fifty-three (53) storage tanks (including two (2) 6,000 gallon product storage tanks),  
Metal working, and an industrial coating,  
Adhesive manufacturing processes (including three (3) PUR reactors (two (2) 300 gallon and 1,500 gallon) with a vacuum pump),  
One (1) 80 gallon grease pilot reactor with a vacuum pump system,  
V-DAMP process which includes three (3) mixers controlled by dust collector and two (2) silos, and  
One (1) Batch Chemical Reactor (Tank 41) with condenser.

The primary emissions of concern are generated from manufacturing processes and equipment are volatile organic material (VOM) and hazardous air pollutants (HAP). Other contaminants formed by natural gas combustion are carbon monoxide, particulate matter and volatile organic material.

## **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, 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 standards for sources of Volatile Organic Material (VOM) and Hazardous Air Pollutants (HAP). The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern for polymer, adhesive, industrial coating manufacturing plant is VOM emissions. VOM emissions are generated by the polymer manufacturing process, adhesive manufacturing process, industrial coating manufacturing process, metal working manufacturing process, V-DAMP unit, and storage tanks.

Other emissions of hazardous air pollutants (HAP) are also emitted; however, their levels are also depended on the amount of VOM and will remain below the major source threshold level of 10 ton per year for single HAP and 25 ton per year for combined total HAPs.

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

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. The Illinois EPA is administering these standards in Illinois on behalf of the United States EPA under a delegation agreement. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

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 100

tons for VOM, 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 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 the polymer, adhesive, industrial coating manufacturing plant. These limitations are consistent with the historical operation and capacity of the facility.

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.