

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Nexeo Solutions LLC for Renewal of
The Federally Enforceable State Operating Permit (FESOP) for
8500 South Willow Springs Road, Willow Springs

Site Identification No: 031327AAC
Application No.: 73020131

Schedule

Public Comment Period Begins: June 18, 2014
Public Comment Period Closes: July 18, 2014

Illinois EPA Contacts

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I. INTRODUCTION

Nexeo Solutions LLC currently operates under federally enforceable state operating permit (FESOP) which expired. 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). Production and emission limitations, as well as monitoring and recordkeeping conditions contained in the FESOP have prevented the facility from being a major source and will assure this status in the future. These conditions would be enforceable by both the State of Illinois and USEPA.

II. SOURCE DESCRIPTION

Ashland Inc. operates Organic Liquids Bulk Terminal. Organic liquids received by the tank trucks and railroad cars are stored in the fifty-eight storage tanks. Nine of the storage tanks are equipped with internal floating roofs. Stored liquids may be shipped off by the tank trucks or in the containers which are filled at the plant. Part of liquids is mixed in the blending tanks with recirculate pipe loop. Evaporation of organic materials creates emissions of Volatile Organic Material (VOM), part of which may be Hazardous Air Pollutants (HAP).

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 needs 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 of the 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-threshold of 100 tons/year for VOM, 10 tons per year for an individual HAP and 25 tons per year of total 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 emissions of particulate matter (PM) from process and fugitive sources, e.g., 35 IAC, Part 212, Subpart B – Visible Emissions, Subpart K – Fugitive Particulate Matter and Subpart L – PM Emissions from Process Emission Units.

Emission units emitting VOM are regulated by Part 218. Organic liquid storage tanks are regulated by Subpart B. The sources of VOM emissions are subject to general VOM emission limitation found in Subpart G – Use of Organic Material.

The organic liquid storage tanks are subject to New Source Performance Standard (NSPS) for Volatile Organic Liquid Storage Vessels, 40 CFR 60, Subpart Kb.

Chemical mixing operations using or producing specified HAPs are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Chemical Manufacturing Area Sources, 40 CFR 63 Subpart VVVVVV.

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 identify the specific emission standards that apply to the emission units at the plant. The process emission units shall not exhibit emission of particulate matter exceeding 30% and fugitive emissions shall not cross property line as specified in Part 212, Subpart B and Subpart K. As explained, the plant operations are subject to 35 IAC 218, Subparts B and G which limit VOM emissions from subject emission units and also requires to store organic liquids with vapor pressure exceeding certain threshold to be stored in the tanks equipped with floating roof. The conditions of this permit are intended to ensure that the source complies 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 10 tons for an individual HAP and 25 tons for combined HAPs.

The permit conditions would also 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 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.