

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Rhodia, Inc. --Revision
Federally Enforceable State Operating Permit (FESOP) for
14000 South Seeley Avenue
Blue Island, Illinois

Site Identification No.: 031024AAAY
Application No.: 72111531

Schedule

Public Comment Period Begins: August 26, 2009
Public Comment Period Closes: September 25, 2009

Illinois EPA Contacts

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I. INTRODUCTION

Rhodia, Inc. has applied for revision of its Federally Enforceable State Operating Permit (FESOP) for its Blue Island location. 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 revised permit that it would propose 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

Rhodia, Inc. is a facility that produces extensive range of surfactant, surfactant blends, and structured liquid surfactants for the personal care, home care, industrial and institutional cleaning, agricultural, and oilfield markets. The emission units at this plant that require an operating permit include amide synthesis unit operation, continuous sulfate unit operation, blending operation and three boilers. These units are sources of emissions because emissions of particulate matter, and volatile organic material, will result from the processing of raw material and combustion of natural gas.

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 not 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.

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 concerning fugitive particulate matter, particulate matter emission from process units located in the area near Chicago. The application shows that the plant is in compliance with applicable state emission standards.

V. CONTENTS OF THE PERMIT

The revised 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 equipment and operations associated with amid synthesis and continuous sulfation units are subject to 35 Ill. Adm. Code 218.301 which limits volatile organic material emissions. Also this facility is subject to 35 Ill, Adm. Code 212.301 which does not allow fugitive particulate matter from any process visible beyond the property line of the source. 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, operating practices, 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.

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.