

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

**BUREAU OF AIR**

**DIVISION of AIR POLLUTION CONTROL**

**PERMIT SECTION**

November 5, 2007

Responsiveness Summary for the  
Clean Air Act Permit Program (CAAPP) Permit Application for:

HA – International, LLC  
1449 Devils Backbone Road  
Oregon, Illinois 61061

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## **INTRODUCTION**

HA International has applied to the Illinois Environmental Protection Agency (Illinois EPA) for a Clean Air Act Permit Program (CAAPP) permit for resin coated sand production facility located in Sauget, Illinois. The main product is resin coated sand.

This Responsiveness Summary has been prepared by the Illinois EPA as part of the CAAPP application for this source.

## **BACKGROUND**

### Clean Air Act Permit Program (CAAPP)

The Clean Air Act Permit Program (CAAPP) is Illinois' federally approved operating permit program for major stationary sources of emissions and other sources, as required by Title V of the Clean Air Act. Permits issued under the CAAPP are known as "CAAPP permits." Major stationary and other sources covered by Title V of the Clean Air Act are required to apply for and obtain a CAAPP permit. CAAPP permits must include emissions limitations and standards and other requirements under state and federal environmental laws and regulations and related provisions to assure compliance with applicable requirements. CAAPP permits generally do not impose new substantive requirements for control of emissions. Rather, these permits provide for, among other things, testing, monitoring, recordkeeping, and reporting (a portion of which may be 'new' requirements) to assure compliance with existing state and federal emission control requirements. The conditions of CAAPP permits are enforceable by the public, as well as by the state and federal government.

### Public Participation

This permit previously went to public notice and that notice period ended on May 23, 2007. Comments were received by the public regarding odors emanating from the facility. This responsiveness summary explains the Illinois EPA's response to those comments.

### USEPA Review

The permit is now going to USEPA review as a proposed permit.

## **GENERAL DESCRIPTION OF THE PLANT AND THE PROPOSED PERMIT**

The emissions from these similar process lines for manufacturing resin coated sand include PM from handling of sand, the raw material, and the product after being coated. Some equipment that is totally enclosed is not vented to control equipment but several pieces of equipment are vented to control equipment (bag collectors).

The mixers in which the coatings are applied are vented to scrubbers, but for two of the three lines no efficiency for VOM/HAP removal is claimed. In the third line some VOM/HAP removal does occur.

The final product may be shipped out in bulk trucks, bulk railcars, or packaged into boxes, sacks, etc.

## **RESPONSE TO COMMENTS**

As a result of public notice of the CAAPP permit there were two odor comments received by the Illinois EPA.

There was one letter from a citizen and a second letter from the Director of the Ogle County Solid Waste Management Department. He stated that in the past he has received odor complaints from various citizens but the organization only has the authority to deal with solid waste issues.

Odor complaints are considered a compliance and enforcement matter and cannot be resolved through a permit transaction.

The facility has certified compliance with the air regulations and there are currently no air emission violations at the source. Although the facility is a major source of Hazardous Air Pollutants, the USEPA has not issued nor is it planning to propose a NESHAP (National Emission Standard for Hazardous Air Pollutants) for facilities manufacturing the product manufactured by HA. Therefore a compliance plan cannot be added to the permit because the source is currently in compliance with the applicable rules specified in the CAAPP permit.

The Bureau of Air Field Inspector believes that the odors are caused by the meteorological conditions at the site and not by a violation of the rules, that is, the ridge near the plant causes "downwash" of pollutants to surface levels rather than rising to upper atmospheric levels.

Odor complaints are handled by the Compliance Unit in conjunction with Enforcement and the Field Operations Section. Therefore the comments have been referred to the Compliance Unit.