

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an
Construction Permit Application
From Engineered Polymer Solutions, Inc. for
One (1) one-gallon filling line and one (1) five-gallon filling line
Latex Paint and Coatings Manufacturing Plant
Wheeling, Illinois

Site Identification No.: 031324ACO
Application No.: 09010025

Schedule

Public Comment Period Begins: May 7, 2009
Public Comment Period Closes: June 6, 2009

Illinois EPA Contacts

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I. INTRODUCTION

Engineered Polymer Solutions, Inc. has submitted a construction permit application for one (1) one-gallon filling line and one (1) five-gallon filling line for their Latex Paint and Coatings Manufacturing Plant. 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

Engineered Polymer Solutions, Inc. facility in Wheeling, IL is a manufacturer of latex based paints and coatings that use water as the primary solvent. The emission units at this plant that require an operating permit include storage tanks, mixers mixing vessels controlled by a dust collector, let-down tanks, holding/mixing tanks, wash/wastewater tanks and filling lines for the production of latex paints and coatings. These units are sources of emissions because the manufacturing of paints and coatings releases some of the materials solvents that are mainly water and some organic solvents. The paint and coating manufacturing process emits volatile organic material (VOM). These organic solvents also contain minor components that are considered hazardous air pollutants (HAPs).

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 board has specific standards for sources of Volatile Organic Material (VOM) in the greater Chicago Area. The application shows that the plant is in compliance with applicable state and federal emission standards.

The principal air contaminant of concern are volatile organic material (VOM) which is created by the storage tanks, mixers mixing vessels controlled by a dust collector, let-down tanks, holding/mixing tanks, wash/wastewater tanks and filling lines. The facility has limited their throughput that will keep the VOM emissions below the major source threshold level of 100 tons per year for PM and 100 tons per year for VOM.

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 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 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 paint and coating manufacturing. 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.