

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary for an Application from  
Starkey Chemical Process Company for Renewal of the  
Federally Enforceable State Operating Permit (FESOP) for  
Chemical Mixing and Packaging Plant  
LaGrange, Illinois

Site Identification No.: 031153AAX  
Application No.: 74110006

Schedule

Public Comment Period Begins: May 16, 2007  
Public Comment Period Closes: June 15, 2007

Illinois EPA Contacts

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## **I. INTRODUCTION**

Starkey Chemical Process Company has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its chemical mixing and packaging plant. 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 renewed 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**

Starkey Chemical Process Company is a specialty chemical mixer and packager. They package in containers from ¼ ounce to 55-gallon drums. They package approximately 350 different formulas, some as few as 1 or 2 gallons per year, others, many thousands gallons per year. The emission units at this plant that require an operating permit include 21 mixers, 2 roll mills, 25 filling lines, and 4 storage tanks. These units are sources of emissions because emissions generated from chemical processing and packaging are volatile organic material (VOM) and 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 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 chemical mixing and packaging plant are VOM emissions. VOM emissions are generated by the mixers, fill lines, roll mills, and storage tanks.

There are a number of small storage tanks within the building. A large amount of blending, mixing and milling equipment designed for small volume processing. All of the equipment releases some small amount of VOM emissions during processing and storage. There is no air pollution control equipment in place to reduce the amount of emissions released into the atmosphere.

## **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. As explained, the storage tanks are subject to New Source Performance Standards (NSPS), 40 CFR 60, Subparts Kb. 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 mixers, fill lines, roll mills, and storage tanks emissions. 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.