



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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## PROJECT SUMMARY

Federally Enforceable State Operating Permit (FESOP)  
Velocity Services, LLC  
Granite City, Madison County, Illinois

Site Identification No.: 119040AAO  
Application No.: 05010036

### Schedule

Public Comment Period Begins: October 15, 2014  
Public Comment Period Closes: November 14, 2014

### Illinois EPA Contacts

Permit Analyst: German Barria

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## **I. INTRODUCTION**

Velocity Services, LLC has applied for a Federally Enforceable State Operating Permit for the plant located at Granite City, Illinois. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft permit that it would propose to issue for the plant. However, before issuing 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**

Velocity Services, LLC formally Vertellus specialties, Inc., and prior Reilly Industries, Inc. is primarily a petroleum tar processing plant, that also storage and distributes coal tar. The facility is located at 1450 Edwardsville Road, Granite City, Madison County. The emission units at this plant that require an operating permit include petroleum tar and coal tar storage tanks, petroleum tar distillation units, pitch holding tanks, distillates day tanks, a waste water treatment plant, natural gas combustion tank heaters and boilers, and HCL transfer system. These units are source of VOM, NO<sub>x</sub>, CO, PM, SO<sub>2</sub>, and hazardous air pollutants (HAP) which are emitted to the atmosphere.

## **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.

This facility will be operating under a FESOP because the actual emissions of the facility are below the levels at which the facility would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the facility's potential emissions would be such that the facility would be considered a major source. The permit acts to restrict the facility 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 facility, as would otherwise be required.

The FESOP limits the operation and annual emissions of the facility to below the major-source-thresholds of 100 tons for VOM and 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 Nitrogen oxides (NO<sub>x</sub>), Volatile Organic Material, Particulate Matter (PM<sub>10</sub>), Sulfur Dioxide (SO<sub>2</sub>) and Carbon Monoxide (CO) emission. The application shows that the facility 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 new and modified emission units at the plant. The VOM emissions are subject to 35 Ill. Adm. Code 219.121, 219.122, 219.142, 219.301, 219.500(a), (c), (d), 219.501(a) &(b), 219.502(b), 219.503, and 219.505 which address organic emissions for these units. The boilers are subject to the New Source Performance Standards (NSPS) for Small Industrial - Commercial – Institutional Steam Generating Units, 40 CFR 60, Subparts A and Dc. The conditions of this permit are intended to ensure that the source comply with applicable emission standards.

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 issuance of this 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 of 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 Ill. Adm. Code Part 166.