



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

OCT 12 2005

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John Lakenan
Site Manager
Celanese Ltd.
1985 Old Naples Road
Meredosia, IL 62665

Re: Notice of Violation
Finding of Violation
Celanese Ltd.
Meredosia, Illinois

Dear Mr. Lakenan:

The United States Environmental Protection Agency (U.S. EPA) is issuing the enclosed Notice of Violation (NOV)/ and Finding of Violation (FOV) to Celanese Ltd. (Celanese). The NOV/FOV is being issued under Section 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(1) and (a)(3). We find that you are violating the terms of your Title V permit and the Illinois State Implementation Plan (SIP) at your Meredosia, Illinois facility.

We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the NOV/FOV.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you

the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The U.S. EPA contact in this matter is Shannon Downey. You may call her at (312)353-2151 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Stephen Rothblatt".

Stephen Rothblatt, Director
Air and Radiation Division

Enclosure

cc: Julie Armitage, Acting Manager
Compliance and Enforcement Section Bureau of Air
Illinois Environmental Protection Agency

4. The regulation at 40 C.F.R. 70.7(b) prohibits a source, which is subject to 40 C.F.R. Part 70, from operating except in compliance with a permit issued under a 40 C.F.R. Part 70 program.

5. On December 4, 2001, U.S. EPA promulgated final approval of the Illinois Title V program, which became effective on November 30, 2001. 66 Fed. Reg. 62946.

6. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), provides that it is unlawful for any person to violate any requirement of a permit issued under Title V of the Act.

7. On February 21, 1980, U.S. EPA approved 35 Illinois Administrative Code (IAC) Part 215, as part of the federally enforceable SIP for Illinois. 45 Fed. Reg. 11472. This Part contains standards and limitations for emissions of organic material and volatile organic material (VOM).

13. 35 IAC 215.301 states that no person shall cause or allow the discharge of more than 3.6 Kg/Hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in Sections 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

Celanese's Facility

8. Celanese owns and operates an emulsions facility at 1985 Old Naples Road, Meredosia, Illinois. Celanese's facility creates lacquers and polymer resins.

9. Vinyl Acetate is a photochemically reactive material emitted from Celanese's emulsions manufacturing facility.

10. On November 6, 2002, Illinois Environmental Protection Agency (IEPA) issued a Title V permit, Application No. 96030068 to Celanese.

11. Section 3.2.3 of Celanese's Title V permit states that for each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with

the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

12. Section 7.1.3 (c) of Celanese's Title V permit states that Reactors 22 and 45 are subject to 35 IAC 215.301.

13. Celanese submitted an Excess Emissions, Monitoring Equipment Downtime and Miscellaneous Reporting Form to the Illinois EPA reporting a release of 200 lbs of vinyl acetate from Reactor 45 on June 24, 2005.

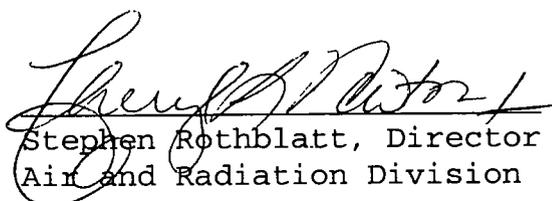
14. Celanese submitted an Excess Emissions, Monitoring Equipment Downtime and Miscellaneous Reporting Form to the Illinois EPA reporting a release of 1,935 lbs of vinyl acetate, 32 pounds of heptane, and 14 pounds of ethyl acetate over a 47 minute period from Reactor 22 on June 30, 2005.

Violations

15. By emitting VOMs at a rate in excess of 8 lbs/hour on June 24, 2005, Celanese has violated Section 502(a) of the Act, 42 U.S.C. § 7661a(a), 35 IAC 215.301, and Conditions 3.2.3 and 7.1.3 (c) of its Title V Permit.

16. By emitting VOMs at a rate in excess of 8 lbs/hour on June 30, 2005, Celanese has violated Section 502(a) of the Act, 42 U.S.C. § 7661a(a), 35 IAC 215.301, and Conditions 3.2.3 and 7.1.3 (c) of its Title V Permit.

10/12/05
Date


Stephen Rothblatt, Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Notice of Violation, No. EPA-05-06-01-IL, by Certified Mail, Return Receipt Requested, to:

John Lakenan
Site Manager
Celanese Ltd.
1985 Old Naples Road
Meredosia, IL 62665

I also certify that I sent copies of the Notice of Violation by first class mail to:

Julie Armitage, Acting Manager
Compliance and Enforcement Section Bureau of Air
Illinois Environmental Protection Agency
1021 N. Grand Avenue
Springfield, IL 62702

on the 13th day of October, 2005.



Betty Williams, Secretary
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000589091803