



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

REPLY TO THE ATTENTION OF:

JAN 20 2016

Mr. Ray Pilapil
Permit Section Manager
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Pilapil:

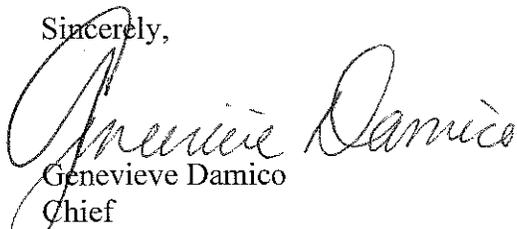
The U.S. Environmental Protection Agency has reviewed the draft federally enforceable state operating permit for PVS Chemicals, Inc., permit number 98070044. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) Condition 3a does not identify EU02, EU04, EU06, or the hydrochloric acid (HCl) transloading station as being subject to the visible emissions requirements of 35 Ill. Adm. Code Part 212 Subpart B. Specifically, 35 Ill. Adm. Code 212.123(a) states that the requirement is applicable to any emission unit other than those subject to 35 Ill. Adm. Code 212.122. With no further discussion of applicability in either the permit or the project summary, it is not clear why these emission units are not also subject to 35 Ill. Adm. Code Subpart B. We request that you determine whether 35 Ill. Adm. Code Part 212 Subpart B is applicable to EU02, EU04, EU06, and the HCl transloading station and to revise condition 3a if necessary.
- 2.) Condition 3f does not identify EU02, EU04, EU06, and the HCl transloading station as being subject to particulate matter (PM) requirements of 35 Ill. Adm. Code Part 212 Subpart L. Specifically, 35 Ill. Adm. Code 212.321 and 212.322 apply to process emission units, depending on when each process emission unit is constructed or modified. With no further discussion of applicability in either the permit or the project summary, it is not clear whether these emission units are process emission units subject to 35 Ill. Adm. Code Part 212 Subpart L. We request that you determine whether 35 Ill. Adm. Code Part 212 Subpart L is applicable to EU 02, EU04, EU06, and the HCl transloading station. If you determine that 35 Ill. Adm. Code Part 212 Subpart L is applicable to these emission units, then we request that you revise condition 3f and the PM emission limits in condition 10a.ii as necessary.

- 3.) The permit, as written, does not contain monitoring to ensure compliance with the opacity requirements in condition 3. We note that condition 12 of the permit requires opacity testing upon request of Illinois EPA, but does not require the source to periodically determine the opacity at the source. We request that you revise the permit to include periodic monitoring requirements that ensure compliance with the opacity limits included in the permit.
- 4.) The allowable monthly and annual emissions for carbon monoxide (CO), nitrogen oxides, PM, and sulfur dioxide in condition 10b.ii are not calculated correctly. For example, allowable CO emissions listed in the permit are 0.92 tons per month and 9.20 tons per year. However, the product of the listed emission factor in condition 10b.ii and the natural gas usage limit required in condition 10b.i instead yields an allowable CO limit of 0.77 tons per month and 7.73 tons per year. We request that you verify the boiler's allowable emissions and correct condition 10b.ii as necessary.
- 5.) During our review, we also noted the following typographical errors:
 - a. Permit condition number 6a-c is repeated twice on page 3 and page 4.
 - b. Permit condition 18c.v. cites 35 Ill. Adm. Code 212.324(g)(1), but we believe that this should instead cite 35 Ill. Adm. Code 212.324(g)(5).

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,


Genevieve Damico
Chief
Air Permits Section