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April 30, 2020

Illinois Environmental Protection Agency
Bureau of Air, Compliance Section (#40)
1021 North Grand Avenue, East
P.O. Box 19276
Springfield, IL 62794-9276
Telephone: 217/782-5811

RE: *Construction Permit No. 19100015 Quarterly Report – Q1 2020*
Vantage Specialties Inc., Gurnee, IL (Facility ID 097035AAQ)

To Whom It May Concern:

Vantage Specialties Inc. (Vantage Specialties) hereby submits the first Quarterly Report for Construction Permit No. 19100015, for our plant located in Gurnee, Illinois (Facility ID 097035AAQ). On December 17, 2019, Vantage Specialties received Construction Permit No. 19100015, which sets an annual cap on the Gurnee Facility's emissions of Ethylene Oxide (EO) beginning in calendar year 2020. This report is submitted pursuant to Condition 7(a) of the Construction Permit. The Construction Permit conditions that specify quarterly report details are included below, shown in italics, with our responses to each condition following in bold.

General Conditions

Construction Permit No. 19100015 requires the following:

Condition 7 (a):

The Permittee shall submit quarterly reports to the Illinois EPA that include the following information. These reports shall be submitted within 30 days of the end of each calendar quarter.

This quarterly report covers the period of January 1, 2020, to March 31, 2020. This quarterly report is being submitted within 30 days of the end of the calendar quarter (i.e., by April 30, 2020).

(i). The information required to be reported in these quarterly reports by other conditions of this permit.

This Quarterly Report includes the information required by Conditions 7(a), 17(b), and 22(a) of Construction Permit No. 19100015.

(ii). A summary of the notifications required to be submitted by other conditions of this permit for deviations from the requirements of this permit, if any, during the quarter.

Vantage Specialties did not have any deviations from the requirements of Construction Permit No. 19100015 during the reporting period. Therefore, no such notifications were submitted.

(iii). For the first, second and third quarters for a calendar year:

1) The cumulative emissions of ethylene oxide in the calendar year from the affected facility in total and from affected components based on emission data collected through such period(s) and,

See table below.

2) If cumulative emissions are more than 25, 50 or 75 percent, respectively, of the emission cap in Condition 3(a), a discussion of whether these cumulative emissions were the result of circumstances that are expected to be present in the remainder of the calendar year.

Not applicable. See table below.

Cumulative Emissions of Ethylene Oxide for the First Quarter

	Emission Cap (lbs/year) *	Cumulative Emissions (lbs for year-to-date)	Cumulative Emissions/ Emission Cap (%)
<i>Affected facility (in total)</i>	110	21.62	19.65%
<i>Affected components</i>	60	14.70	24.51%

Note:* Emission Cap per Condition 3(a) of Construction Permit No. 19100015. The cap limits emissions per calendar year.

(iv). With the quarterly report for the fourth quarter in each calendar year:

- 1) Emissions of ethylene oxide of the affected facility and from affected components for the calendar year, and
- 2) If emissions exceed the emission cap in Condition 3(a), provide the notification for the deviation from this cap pursuant to Condition 7(b)(i) in this quarterly report.

This permit condition does not apply to the first quarterly report.

Affected Process Equipment

Construction Permit No. 19100015 requires the following:

Condition 17 (b):

In the quarterly reports required by Condition 7 (a), the Permittee shall provide information describing changes to the monitoring systems that are required by Conditions 13(a) and (b), if any, to improve the limit of quantification of these systems, including a description of the changes, the rationale for the changes, a description of the expected and actual result of the changes, and confirmation that the changes did not negatively affect the performance of the monitoring systems.

On February 26, 2020, Method 301 validation testing was performed by Max Analytical on the FTIR CEMS, and the validation testing passed. No changes were required by Conditions 13(a) and (b) to improve the limit of quantification of these systems during the reporting period.

Affected Components

Construction Permit No. 19100015 requires the following:

Condition 22(a):

In the quarterly reports required by Condition 7(a), the Permittee shall include the following information for each monitoring campaign for affected components completed during the quarter. To the extent that the specified information is not yet available (e.g., maintenance of components in response to the campaign is not completed), such information shall be reported in the subsequent quarterly report.

- (i). General information for each monitoring campaign, including
 - 1) Responsible entity;

- 2) Start and end dates;
- 3) Number of monitoring personnel;
- 4) Total number of components in the affected facility;
- 5) Number of components monitored; and
- 6) Numbers of components, by the applicable reason (e.g., not in operation or not in ethylene oxide service at the time of the campaign), that were not monitored.

Please see below for the general information for the monitoring campaigns during the reporting period.

	January	February	March
Responsible entity	Montrose Air Quality Services	Montrose Air Quality Services	Montrose Air Quality Services
Start Date	1/6/2020	2/3/2020	3/2/2020
End Date	1/7/2020	2/5/2020	3/5/2020
Number of monitoring personnel	2	1	1
Total number of components in the affected facility	709	709	709
Number of components monitored	709	709	709
Numbers of components, by the applicable reason (e.g., not in operation or not in ethylene oxide service at the time of the campaign), that were not monitored	0	0	0

(ii). Summary information for components that were not leaking for which maintenance was initiated as a result of the monitoring, including the numbers of components, by the type of component, for which maintenance was performed.

There were no components that were not leaking for which maintenance was initiated as a result of the monitoring during the reporting period.

(iii). Detailed information for each leaking component that was identified in the monitoring campaign, including:

- 1) Component Identifier;
- 2) Type of component;
- 3) Dates and times when the initial repair was completed and follow-up monitoring was conducted;
- 4) If further repairs were needed, dates and times when final repairs were completed and follow-up monitoring conducted, and
- 5) A description of the repair(s) that were completed for the component.

There were no leaking components in January and February 2020. Detailed information for the only leak detected in March 2020 is provided in the following table.

Detailed Information for Each Leaking Component in March 2020 Monitoring Campaign

Component Identifier (Tag Number)	Type of component	Repair	Follow-up Monitoring	Repair Method
0440.2	Flange	March 4, 2020 12:35	March 4, 2020 12:40	Tighten Bolts

Component 0440.2 was repaired on the initial monitoring day and passed the follow-up monitoring. No further repairs were needed.

Vantage Specialties is submitting this report electronically per conversations with IEPA due to the COVID-19 pandemic. The original report will be mailed when practical.

If there are any questions concerning this report, please do not hesitate to call the Gurnee Facility's Environmental Engineer, Ms. Dee Vanek, at (847) 249-6805.

Sincerely,



Bernie Stratton
Site Manager

4/30/2020

Date