

## **Small Manufacturer**

One chemical product line with significant particulate emissions  
and slight hydrochloric acid emissions

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### **Project Background**

This client had air pollution controls in place, but didn't understand how to operate or maintain them, as required; which resulted in visible air pollutants and subsequent violations from the Illinois Environmental Protection Agency (IEPA).

The environmental attorney retained to handle the violations was not equipped to stay on top of the many technical issues surrounding the client's operation or the in-place pollution controls.

As a result, the attorney did not properly or effectively coordinate the technical issues for the client's response to the IEPA regarding the violations. Specifically, the required air emission stack testing that was performed was not understood and was not adequate for the situation. Further, the technical details concerning the stack test methodology, data collection, and analysis was not provided to the IEPA, as required.

### **Admiral Assistance**

When Admiral Environmental Services (Admiral) was retained by the client to address the unresolved IEPA violations, our staff was able to quickly assess the situation and take over the technical investigation to formulate effective responses to the IEPA.

Because of the extent of our understanding of the many technical issues surrounding the violations and our experience working with operations and pollution control equipment similar to that of our client, Admiral was able to negotiate the acceptance of the existing stack test methodology and data to document compliance conditions along with minimal additional stack testing to satisfy the IEPA.

### **Admiral Results**

In the end, Admiral favorably resolved a complicated interpretation of the applicable regulations so that only one of the in-place air controls was needed as an integral part of the process. This successful negotiation with the IEPA resulted in the elimination of several of the original violation notices.

Admiral prepared the successful re-permitting of the facility, assisted with the negotiation to reduce the remaining penalty, and prepared back-year reporting to keep the facility in compliance.