FINAL DRAFT/PROPOSED CAAPP PERMIT
Lake River Corporation
I.D. No.: 031808AAC
Application No.: 95100081
June 9, 2000

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Lake River Corporation
Attn: Tim Zatorski
5005 South Harlem Avenue
Forest View, Illinois 60402

Application No.: 95100081 I.D. No.: 031808AAC
Applicant's Designation: Date Received: October 18, 1995
Operation of: Bulk Chemical Storage terminal
Date Issued: TO BE DETERMINED Expiration Date[2]: DATE
Source Location: 5005 South Harlem Avenue, Forest View, Cook County
Responsible Official: Glenn J. Gibisch/President

This permit is hereby granted to the above-designated Permittee to operate a bulk chemical storage terminal, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Nathan A. Frank at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:NAF:psj

cc: Illinois EPA, FOS, Region 1
USEPA

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Lake River Corporation
5005 South Harlem Avenue
Forest View, Illinois 60402
708/788-0090

I.D. No.: 031808AAC
Standard Industrial Classification: 4226, Special Warehousing

1.2 Owner/Parent Company

Kinark Corporation
7060 South Yale Avenue
Tulsa, Oklahoma 74136

1.3 Operator

Lake River Corporation
5005 South Harlem Avenue
Forest View, Illinois 60402

Tim Zatorski
708/788-0090

1.4 General Source Description

The Lake River Corporation is located at 5005 South Harlem Avenue, Chicago. The source consists of several chemical storage tanks, loading racks, and drum filling equipment.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
ILCS	Illinois Compiled Statutes
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Tanks storing the following materials with low vapor pressures:

glycol (T132)
propylene glycol (T200 and T351)
triethylene glycol (T308)
dipropylene glycol (T333)
light base oil (T19)
diethanolamine (T313, T320, and T355)
monoethanolamine (T323, T352, and T354)
triethanolamine (T349, T350, T353, T356, and T357)

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Equipment used for filling drums, pails, or other packaging containers, excluding aerosol cans, with soaps, detergents, surfactants, lubricating oils, waxes, vegetable oils, greases, animal fats, glycerin, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(8)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 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.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a)and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Group 1 Storage Tanks (see attachment 1 for details)	Fixed roof storage tanks	See attachment 1	None
Storage Tanks (see attachment 1 for details)	Internal Floating roof storage tanks	See Attachment 1	Internal Floating roof with primary and secondary seal
Loading and drumming equipment	Truck, Railcar, Barge, and Drum loading equipment	Constructed – pre-1972 Modified - 12/1993	None
Boilers	Fuel combustion units fired on natural gas or residual fuel oil	East Boiler – 1942 West Boiler – 1958 Southwest Boiler - 1967	None
Fugitive VOM Emissions	Piping, valves, and pumps used to transfer materials between the storage tanks and the unloading station	-	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements

of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.5 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.6 PM_{10} Contingency Measure Plan

Should this stationary source, as defined in 35 IAC 212.700, become subject to the requirement to prepare and submit a contingency measure plan reflecting the PM_{10} emission reductions as set forth in 35 IAC 212.703, then the owner or operator shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented in accordance with 35 IAC 212.704. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U, incorporated herein by reference.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	185.4
Sulfur Dioxide (SO_2)	15.45
Particulate Matter (PM)	4.9
Nitrogen Oxides (NO_x)	37.40
HAP, not included in VOM or PM	---
TOTAL	243.15

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage, handling of that liquid, as determined by the unit specific compliance procedures described in Section 7.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations and 40 CFR 61 Subpart V – National Emission Standards for Equipment Leaks do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to verify that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63, Subpart Y, and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5.2:

a. Source wide emissions of each individual HAP and all HAPs combined from the emission units covered in Section 7 (Unit Specific Conditions) of this permit.

5.6.5 Records for Operating Scenarios

N/A

5.6.6 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and

b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a “cap and trade” market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold “allotment trading units” (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources’ CAAPP permits. These allotments are established from historical VOM emissions or “baseline emissions” lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account’s balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources’ transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the “Alternative Compliance Market Account” (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit. This limitation is established at the request of the source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 IAC 205.205.

6.3 Recordkeeping and Reporting

a. The Permittee shall maintain the following records to determine compliance with the above limitation:

i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;

ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and

iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.

b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 35 IAC 205.300.

c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs)

for its VOM emissions during each seasonal allotment period.

6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Fixed Roof Storage Tanks

7.1.1 Description

The Permittee utilizes several cylindrical fixed roof storage tanks to store various chemicals. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.1.2 List of Emission Units and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
T1 - T11 T19 – T21 T23, T25 – T27 T29 – T41 T43 – T59 T100, T102 T104 – T116 T118 – T194 T202, T301 T303 – T363 A1 – A10	Fixed Roof Tanks	None

7.1.3 Applicability Provisions and Applicable Regulations

a. An “affected storage tanks” for the purpose of these unit-specific conditions, are the storage tanks described in Conditions 7.1.1 and 7.1.2.

b. The affected storage tanks are subject to the emission limits identified in Condition 5.2.2.

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected storage tanks not being subject to the New Source Performance Standards (NSPS) for Storage Vessels for Petroleum Liquids, 40 CFR Part 60, Subparts K and Ka, because the affected storage tanks do not contain petroleum liquids.

b. This permit is issued based on the affected storage tanks not being subject to the New Source Performance Standards (NSPS) for Storage Vessels for Volatile Organic Liquid Storage Vessels, 40 CFR Part 60, Subpart Kb, because the affected storage tanks were constructed prior to July 23, 1984.

c. This permit is issued based on each affected storage tank not being subject to 35 IAC 218.120, either because the VOL stored the tank has a maximum true vapor pressure less than 0.75 psia, or because the storage tank has a design capacity less than 40,000 gallons.

d. This permit is issued based on each affected storage tank not being subject to 35 IAC 218.121 and 35 IAC 218.123, because the affected storage tanks do not contain VPL, as defined in 35 IAC 211.7170.

e. This permit is issued based on each affected storage tank not being subject to 35 IAC 218.122 pursuant to 35 IAC 218.122(c) because the VOL stored in each tank has a vapor pressure less than 2.5 psia at 70°F.

7.1.5 Operational and Production Limits and Work Practices

a. The Permittee shall not store any VOL with a maximum true vapor pressure equal to or greater than 0.75 psia in any affected storage tank with a design capacity greater than 40,000 gallons. This limit is to ensure that no affected storage tank is subject to the requirements of 35 IAC 218.120.

b. The Permittee shall not store any material designated as a petroleum liquid or a VPL, as defined in 35 IAC 211.4610 and 35 IAC 211.7170 respectively, in any affected storage tank with a design capacity greater than 40,000 gallons. These limits ensure that no affected storage tank is subject to the requirements of 40 CFR Part 60, Subparts K and Ka, 35 IAC 218.121, and 35 IAC 218.123.

c. The Permittee shall not store any VOL with a vapor pressure greater than 2.5 psia at 70°F in any affected storage tank. This limit is to ensure that no affected storage tank does not meet the exemption

from the control requirements of 35 IAC 218.122 in 35 IAC 218.122(c).

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

The Permittee shall monitor the maximum true vapor pressure in accordance with 35 IAC 218.128(b) and (c) for each affected storage tank as follows:

a. Available data on the storage temperature may be used to determine the maximum true vapor pressure.

i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service [35 IAC 218.128 (b)(1)].

ii. For other liquids, the vapor pressure:

A. Determined by ASTM Method D2879-83;

B. Measured by an appropriate method approved by the Agency and USEPA; or

C. Calculated by an appropriate method approved by the Agency and USEPA [35 IAC 218.128(b)(2)].

b. An affected storage tank storing a mixture of indeterminate or variable composition shall be subject to the following:

i. Prior to the initial filling of the vessel, the maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in Condition 7.1.8(a) above [35 IAC 218.128(c)(1)].

ii. For vessels in which the vapor pressure of the anticipated liquid composition is 0.5 psia or greater but less than 0.75 psia, an initial physical test of the vapor pressure is required; a physical test at least once every 6 months thereafter is required as determined by the following methods:

A. ASTM Method D2879-83;

B. ASTM Method D323-82; or

C. As measured by an appropriate method approved by the Agency [35 IAC 218.128(c)(2)].

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected storage tanks to demonstrate compliance with Conditions 5.5.1, 7.1.3, 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain records of the following items to show compliance with Condition 7.1.5:

i. The maximum true vapor pressure of each material stored in each affected storage tank as determined by the procedure described in Condition 7.1.8 (psia).

ii. The chemical name of each material stored in each affected storage tank.

iii. The vapor pressure of each material stored in each tank at 70°F (psia).

b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6, which shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6. The notification shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

b. The Permittee shall submit the following information along with its annual emission report:

i. A summary of exceedances of the limits in Conditions 7.1.3, 7.1.5, or 7.1.6, if any, which required notification to the Compliance Section in accordance with Condition 7.1.10(a).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected storage tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.1 of this permit.

7.1.12 Compliance Procedures

a. Compliance with Condition 7.1.5(a) shall be demonstrated by the monitoring requirements in Condition 7.1.8 and the recordkeeping requirements of Condition 7.1.9(a)(i).

b. Compliance with Condition 7.1.5(b) shall be demonstrated by the recordkeeping requirements of Condition 7.1.9(a)(ii).

c. Compliance with Condition 7.1.5(c) shall be demonstrated by the recordkeeping requirements of Condition 7.1.9(a)(iii).

d. Emissions from the affected storage tanks shall be determined using the latest version of the TANKS computer software.

7.2 Internal Floating Roof Storage Tanks

7.2.1 Description

The Permittee operates internal floating roof storage tank(s) to store various chemical products.

7.2.2 List of Emission Units and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
T42, T131, T103, T201	Storage tanks Equipped with Internal Floating Roofs	Internal Floating Roof

7.2.3 Applicability Provisions and Applicable Regulations

a. An “affected storage tank” for the purpose of these unit-specific conditions, is a storage tank described in Conditions 7.2.1 and 7.2.2.

b. The affected storage tanks are subject to the emission limits identified in Condition 5.2.2.

c. Each affected storage tank is subject to 35 IAC 218.122 which provides that:

i. The Permittee shall not discharge more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Agency according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108 [35 IAC 218.122(a)].

ii. The Permittee shall not load any organic material into any stationary tank having a storage capacity of greater than 946 1 (250 gal), unless such tank is equipped with a

permanent submerged loading pipe or an equivalent device approved by the Agency according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108 unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as described in 35 IAC 218.121(b)(2) [35 IAC 218.122(b)].

iii. Exception: If no odor nuisance exists the limitations of Conditions 7.2.3(c)(i) and (ii) shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) [35 IAC 218.122(c)].

d. Each affected storage tank is subject to the requirements of 35 IAC 218.120(a)(1) which provides that:

Each vessel storing VOL that has a volume of 40,000 gallons or greater with a maximum true vapor pressure equal to 0.75 psia but less than 11.1 psia shall reduce VOM emissions from storage tanks, reservoirs, or other containers by equipping each fixed roof tank with an internal floating roof that meets the following specifications:

i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible [35 IAC 218.120 (a)(1)(A)].

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:

A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank;

B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous; or

C. A mechanical shoe seal, which is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof [35 IAC 218.120 (a)(1)(B)].

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface [35 IAC 218.120 (a)(1)(C)].

iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use [35 IAC 218.120 (a)(1)(D)].

v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports [35 IAC 218.120 (a)(1)(E)].

vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting [35 IAC 218.120 (a)(1)(F)].

vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening [35 IAC 218.120 (a)(1)(G)].

viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover [35 IAC 218.120 (a)(1)(H)].

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected storage tanks not being subject to the New Source Performance Standards (NSPS) for Storage Vessels for Volatile Organic Liquid Storage Vessels, 40 CFR Part 60, Subpart Kb, because the affected storage tanks were constructed prior to July 23, 1984.

b. This permit is issued based on each affected storage tank not being subject to 35 IAC 218.121 and 35 IAC 218.123, because the affected storage tanks do not contain VPL, as defined in 35 IAC 211.7170

c. This permit is issued based on the affected storage tanks not being subject to the New Source Performance Standards (NSPS) for Storage Vessels for Petroleum Liquids, 40 CFR Part 60, Subparts K and Ka, because the affected storage tanks do not contain petroleum liquids.

7.2.5 Operational and Production Limits and Work Practices

a. The Permittee shall not store any VOL with a maximum true vapor pressure equal to or greater than 11.1 psia in an affected storage tank. This limit ensures that no affected storage tank is subject to the requirements of 35 IAC 218.120(b).

b. The Permittee shall not store any material designated as a petroleum liquid or a VPL, as defined in 35 IAC 211.4610 and 35 IAC 211.7170 respectively, in an affected storage tank. These limits ensure that no affected storage tank is subject to the requirements of 40 CFR Part 60, Subparts K and Ka, 35 IAC 218.121, and 35 IAC 218.123.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected storage tanks are subject to the following:

Emissions and operations of the below listed affected storage tanks shall not exceed the following limits:

Tank Designation	Emissions of VOM (ton/year)
T42	0.69

These limits are based on a maximum of 6 turnovers per year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 83110046, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

The Permittee shall fulfill the applicable monitoring and procedural requirements of 35 IAC 218.127(a) for each affected tank as follows:

a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service) prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the Permittee shall repair the items before filling the storage vessel [35 IAC 218.127(a)(1)].

b. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this subsection cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the Permittee may request a 30-day extension from the Agency in the inspection report required in paragraph (e) of this Condition. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the Permittee will take that will assure that the control equipment will be repaired or the vessel will be emptied within 30 days [35 IAC 218.127(a)(2)].

c. For vessels equipped with both primary and secondary seals:

i. Visually inspect the vessel as specified paragraph (d) of this Condition below at least every 5 years.

ii. Visually inspect the vessel as specified in paragraph (b) of this Condition above [35 IAC 218.127(a)(3)].

d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal, or if the seal fabric or the secondary seal has holes, tears, or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this subsection exists before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraph (b) and (c)(ii) of this Condition above and at intervals no greater than 5 years in the case of vessels specified in paragraph (c)(i) of this Condition above [35 IAC 218.127(a)(4)].

e. Notify the Agency in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraph (a) and (d) of this Condition above to afford the Illinois EPA the opportunity to have an observer present. If the inspection required by paragraph (d) of this Condition above is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the Agency at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why

the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Agency at least 7 days prior to the refilling [35 IAC 218.127(a)(5)].

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected storage tanks to demonstrate compliance with Conditions 5.5.1, 7.2.3, 7.2.5, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 7.2.3(c) (35 IAC 218.122):

i. The vapor pressure of each VOL at 70°F in each affected storage tank.

ii. Design information for the tank showing the presence of a permanent submerged loading pipe.

iii. Maintenance and repair records for the tank, as related to the repair or replacement of a loading pipe.

b. The Permittee shall fulfill the applicable recordkeeping requirements of 35 IAC 218.129(a) for each effected storage tank as follows:

i. Furnish the Agency with a report that describes the control equipment and certifies that the control equipment meets the specifications of Conditions 7.2.3(d) (35 IAC 218.120(a)(1)) and 7.2.8(a) (35 IAC 218.127(a)(1)) [35 IAC 218.129(a)(1)].

ii. Keep a record of each inspection performed as required by Condition 7.2.8 (35 IAC 218.127(a)). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed

condition of each component of the control equipment (seals, internal floating roof, and fittings) [35 IAC 218.129(a)(2)].

c. The Permittee shall maintain records of the following items to show compliance with Condition 7.2.5:

i. The maximum true vapor pressure of each material stored in each affected storage tank.

ii. The chemical name of each material stored in each affected storage tank.

d. The Permittee shall maintain monthly records of the emissions of VOM, as calculated by the TANKS computer software, to demonstrate compliance with Condition 7.2.6, tons/month and tons/year.

e. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6, which shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall fulfill the applicable reporting requirements of 35 IAC 218.129(a) for each affected storage tank as follows:

   i. If any of the conditions described in Condition 7.2.8(b) (35 IAC 218.127(a)(2)) are detected during the annual visual inspection required by Condition 7.2.8(b) (35 IAC 218.127(a)(2)), report to the Agency within 30 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made [[35 IAC 218.129(a)(3)]; and

   ii. After each inspection required by Condition 7.2.8(c) (35 IAC 218.127(a)(3)) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 7.2.8(c)(ii) (35 IAC 218.127(a)(3)(B)) are discovered, report to the Agency within 30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of Conditions 7.2.3(d) (35 IAC 218.120(a)(1)) or 7.2.8 (35 IAC 218.127(a)), and list each repair made [35 IAC 218.129(a)(4)].

b. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6. The notification shall include:

   i. Identification of the limit that may have been exceeded.

   ii. Duration of the possible exceedance.

   iii. An estimate of the amount of emissions in excess of the applicable standard.

   iv. A description of the cause of the possible exceedance.

   v. When compliance was reestablished.

c. The Permittee shall submit the following information along with its annual emission report:

i. The annual emissions of VOM from tank T42 for each month of the previous calendar year, to demonstrate compliance with Condition 7.2.6, (tons/month and tons/year, e.g., for the month of January, the emissions from February, of the preceding calendar year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).

ii. A summary of exceedances of the limits in Conditions 7.2.3, 7.2.5, or 7.2.6, if any, which required notification to the Compliance Section in accordance with Condition 7.2.10(b).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected storage tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.

7.2.12 Compliance Procedures

a. Compliance with the requirements of Condition 7.2.3(c) shall be determined by the following procedure:

i. Qualification for the exemption from the control requirements and emission limits of Condition 7.2.3(c) (35 IAC 218.122) in 7.2.3(c)(iii) (35 IAC 218.122(c)) shall be

determined by the recordkeeping requirements in Condition 7.2.9(a)(i).

ii. For affected storage tanks containing VOL with a vapor pressure of 2.5 psia or greater, compliance with the permanent submerged loading pipe requirements in Condition 7.2.3(c) (35 IAC 218.122) shall be determined by the recordkeeping requirements in Condition 7.2.9(a)(ii) and (iii).

b. Compliance with the requirements of Condition 7.2.3(d) (35 IAC 218.120(a)(1)) shall be demonstrated by the monitoring requirements in Condition 7.2.8 (35 IAC 218.127(a)) and the recordkeeping requirements in Condition 7.2.9(b) (35 IAC 218.129(a)).

c. Compliance with the requirements of Condition 7.2.5(a) and (b) shall be demonstrated by the recordkeeping requirements in Condition 7.2.9(c).

d. Compliance with the emission limits of Condition 7.2.6 shall be demonstrated by the recordkeeping requirements in Condition 7.2.9(d).

e. Emissions from the affected storage tanks shall be determined using the latest version of the TANKS computer software.

7.3 Barge, Railcar, and Truck Loading Racks and Drumming Stations

7.3.1 Description

Loading stations are used to load volatile organic liquid into tank trucks, railcars and barges. Drumming operation are used to package VOL into drums. The VOM emissions from these sources result from losses of VOM during the filling of trucks, railcars, barges, or drums.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Barge Loading Racks	Equipment used to load barges with various chemical products	None
Railcar and Truck Loading Racks	Equipment used to load railcars and trucks with various chemical products	None
Drumming Stations	Equipment used to load drums with various chemical products	None

7.3.3 Applicability Provisions and Applicable Regulations

a. The “affected loading equipment” for the purpose of these unit-specific conditions, is the loading equipment described in Conditions 7.3.1 and 7.3.2.

b. The affected loading equipment is subject to the emission limits identified in Condition 5.2.2.

c. The affected loading equipment is subject to 35 IAC 218.122 which provides that:

i. The Permittee shall not discharge more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a

device that is equally effective in controlling emissions and is approved by the Agency according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108 [35 IAC 218.122(a)].

ii. The Permittee shall not load any organic material into any stationary tank having a storage capacity of greater than 946 1 (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Agency according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108 unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as described in 35 IAC 218.121(b)(2) [35 IAC 218.122(b)].

iii. Exception: If no odor nuisance exists the limitations of Conditions 7.3.3(c)(i) and (ii) shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) [35 IAC 218.122(c)].

7.3.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected loading equipment not being subject to 40 CFR Part 63 Subpart Y, National Emission Standards for Marine Tank Vessel Tank Loading Operations because the source is not a major source of HAPs.

b. This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart Y, because the source does not load gasoline from storage tanks into delivery vessels (tank trucks).

c. This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart GG, because the source does not load gasoline or crude oil into marine vessels.

d. This permit is issued based on the affected loading equipment not being subject to 35 IAC Part 218, Subpart TT, because the maximum theoretical emissions

of VOM are less than 100 tons per year, and the potential to emit is less than 25 tons per year.

7.3.5 Operational and Production Limits and Work Practices

a. The affected loading equipment shall not be used to load or unload gasoline, crude oil, or benzene from barges, trucks, or railcars.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected loading equipment is subject to the following:

Emissions from all drumming operations shall not exceed the following limits:

VOM Emissions	
(Lb/Hour)	(Ton/Year)
1.6	0.4

These limits are based on the maximum rate of drum filling, the compliance procedures in Condition 7.3.12, and 468 hours of operation per year.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 93100043, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected loading equipment to demonstrate compliance with Conditions 5.5.1, 7.3.3, 7.3.5, and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 7.3.3(c):

   i. Design information for the loading area showing the presence of a permanent submerged loading pipe.

   ii. Maintenance and repair records for the loading area, as related to the repair or replacement of a loading pipe.

b. The Permittee shall maintain records of the following items to demonstrate compliance with Condition 7.3.6:

   i. Monthly records of the throughput of each material that loaded into trucks, railcars, and marine vessels and drums by the affected loading equipment (gallons/month and gallons/year).

   ii. A record of the true vapor pressure of each material loaded by the affected loading equipment, psia.

   iii. A record of the temperature of each material that is loaded by the affected loading equipment, °F.

   iv. A record of the chemical name of each material that is loaded into trucks, railcars, drums and marine vessels by the affected loading equipment.

v. Hours of operation of equipment (per month and per year).

vi. Emissions of VOM from the drum filling operations as calculated by the procedures described in Condition 7.3.12(b) (lb/hour and tons/year).

c. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6, which shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected loading equipment with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6. The notification shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

b. The Permittee shall submit the following information along with its annual emission report:

i. A summary of exceedances of the limits in Conditions 7.3.3, 7.3.5, or 7.3.6, if any, which required notification to the Compliance Section in accordance with Condition 7.3.10(a).

ii. The annual emissions of VOM from the affected loading equipment for each month of the previous calendar year, to demonstrate compliance with Condition 7.3.6, tons/year (e.g., for the month of January, the emissions from February, of the preceding calendar year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected loading equipment without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee’s obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the material that is loaded into trucks, railcars, marine vessels, or drums by the affected loading equipment provided they continue to comply with the provisions of Section 7.3.

7.3.12 Compliance Procedures

a. Compliance with the requirements of Condition 7.3.3(c) shall be determined by the following procedure:

i. Qualification for the exemption from the control requirements and emission limits of Condition 7.3.3(c) (35 IAC 218.122) in 7.3.3(c)(iii) shall be determined by the recordkeeping requirements in Condition 7.3.9(a)(i).

ii. When VOL with a vapor pressure of 2.5 psia or greater is loaded, compliance with the permanent submerged loading pipe requirements in Condition 7.3.3(c) shall be determined by the recordkeeping requirements in Condition 7.3.9(a)(ii) and (iii).

b. Compliance with the emission limits in Condition 7.3.6 shall be determined by the recordkeeping requirements in Condition 7.3.9(b) and the procedures described in Condition 7.3.12(c).

c. To determine the emissions from the affected loading equipment, the following formula shall be used:

$$E_L = L_L \times T_m$$

Where:

E_L = Emissions of VOM (lb)
L_L = AP-42 Emission factor, Chapter 5.2, as calculated in equation below (lb/10^3 gallons)
T_m = Loading rate (10^3 gallons)

To calculate the AP-42 emission factor for L_L, the following formula shall be used:

$$L_L = \frac{12.46SMP*}{T}$$

Where:

S = Saturation Factor (0.5 for dedicated normal service)

M = Molecular weight of vapors (lb/lb-mol)

P^* = True vapor pressure of liquid (psia)

T = Temperature of liquid loaded (°R)

7.4 Steam Generation Boilers

7.4.1 Description

Two natural gas-fired boilers and one residual oil-fired boiler are used to produce steam at the source.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
East Boiler	Maximum Firing Rate: 8.40 MBtu/hr Natural Gas Fired	None
West Boiler	Maximum Firing Rate: 25.11 MBtu/hr Natural Gas Fired	None
Southwest Boiler	Maximum Firing Rate: 10.46 MBtu/hr Residual Fuel Oil Fired	None

7.4.3 Applicability Provisions and Applicable Regulations

a. An “affected boiler” for the purpose of these unit-specific conditions, is a boiler described in Conditions 7.4.1 and 7.4.2.

b. The affected boilers are subject to the emission limits identified in Condition 5.2.2.

c. Each affected boiler is subject to 35 IAC 212.206, which provides:

   The emissions of particulate matter (PM) into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/MBtu) of actual heat input from any fuel combustion emission unit using liquid fuel exclusively [35 IAC 212.206].

d. The Southwest Boiler is subject to 35 IAC 214.161(a) which provides:

   The emission of sulfur dioxide (SO_2) into the atmosphere in any one hour period from any existing fuel combustion emission unit, burning liquid fuel exclusively shall not exceed 1.55 of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (1.0 lb/MBtu) [35 IAC 214.161(a)].

e. The West and Southwest boilers are subject to 35 IAC 216.121, which provides:

No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

7.4.4 Non-Applicability of Regulations of Concern

a. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9, 1989, with firing rates of 100 MBtu/hr or less, but greater than 10 MBtu/hr. The dates of construction of the affected West Boiler and Southwest Boiler were prior to the date for which the NSPS would be applicable. Therefore, these rules do not apply to these affected boilers

b. Each affected boiler is not subject to 35 IAC 217.441, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of each affected boiler is less than 73.2 MW (250 MBtu/hr).

c. The affected East boiler is not subject to 35 IAC 216.121, emissions of CO from existing fuel combustion emission units, because the actual heat input of the affected boiler is less than 2.9 MW (10 MBtu/hr).

d. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.4.5 Operational and Production Limits and Work Practices

a. i. The affected East and West boilers shall only be operated with natural gas as the fuel.

ii. The affected Southwest boiler shall only be operated with residual fuel oil as the fuel.

b. The Permittee shall not burn residual fuel oil (Grades No. 4, 5 or 6) in the Southwest boiler with a maximum weight percent sulfur content greater than 0.95%.

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1, 7.4.3, 7.4.5, and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

a. Total natural gas usage for the affected East and West Boilers (mmscf/year);

b. Total residual fuel oil usage for the affected Southwest Boiler (gallons/year);

c. The maximum sulfur content (in wt.%) for each shipment of residual fuel oil used in the affected Southwest Boiler; and

d. Annual aggregate NO_x, PM, SO_2, and VOM emissions from the affected boilers, based on fuel consumption and the applicable emission factors, with supporting calculations (tons/year).

e. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6, which shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected boilers with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6. The notification shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

b. The Permittee shall submit the following information along with its annual emission report:

i. A summary of exceedances of the limits in Conditions 7.4.3, 7.4.5, or 7.4.6, if any,

which required notification to the Compliance Section in accordance with Condition 7.4.10(a).

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected boilers without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.4.12 Compliance Procedures

a. Compliance with Conditions 7.4.3(c) and (e) is demonstrated under inherent operating conditions of the affected boilers, so that no compliance procedures are set in this permit addressing this requirement.

b. Compliance with Condition 7.4.3(d) is demonstrated under inherent operating conditions of the affected boiler fired by residual oil with a sulfur content meeting the specification of Condition 7.4.5(b), so that no compliance procedures are set in this permit addressing this regulation.

c. Emissions shall be calculated based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

i. Emissions resulting from natural gas combustion shall be calculated based on the following emission factors:

Pollutant	Emission Factor (lb/mmscf)
PM	7.5
NO_x	100
SO_2	0.6
VOM	5.5

These are the AP-42 emission factors for uncontrolled natural gas combustion in small industrial boilers, chapter 1.4.

$$E_{ng} = ngc \times \frac{ef}{2000}$$

Where:

E_{ng} = Emissions from natural gas combustion (tons/year)

ngc = natural gas usage (mmscf/year)

ef = Emission factor listed above (lb/mmscf)

ii. Emissions resulting from residual fuel oil combustion shall be calculated based on the following emission factors:

Pollutant	Emission Factor ($lb/10^3$ gallon)
PM	10
NO_x	55
SO_2	157S
VOM	1.04

These are the AP-42 emission factors for uncontrolled residual fuel oil combustion in industrial boilers, Chapter 1.3. 'S' indicates that the weight % of sulfur in the oil should be multiplied by the value given.

$$E_{ro} = roc \times \frac{ef}{2000}$$

Where:

E_{ro} = Emissions from residual fuel oil combustion (tons/year)

roc = residual fuel oil usage (10^3

gallon/year)

ef = Emission factor listed above (lb/10^3 gallon)

7.5 Fugitives Emissions/Equipment Leaks

7.5.1 Description

The Permittee operates piping, valves, pumps, and compressors which are used for material transfer. Leaks from this equipment causes fugitive emissions of VOM.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Fugitive VOM Emissions	Leaks from piping, valves, pumps and compressors used for material transfer	None

7.5.3 Applicability Provisions and Applicable Regulations

a. The “affected equipment” for the purpose of these unit-specific conditions, is the equipment described in Conditions 7.5.1 and 7.5.2.

b. The affected equipment is subject to the emission limits identified in Condition 5.2.2.

c. Pursuant to 35 IAC 218.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of VOL with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3^{o}K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions.

7.5.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected equipment not being subject to the requirements of 40 CFR 63 Subpart H and 40 CFR 61 Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) because the source is not considered a major source of HAPs.

7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

a. The Permittee shall inspect pumps, and compressors of leaks on at least a quarterly basis. If a significant leak is detected by any means, including visual observation, smell, or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs with in 15 days.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected equipment to demonstrate compliance with Conditions 5.5.1, 7.5.3, 7.5.5, and 7.5.6, pursuant to Section 39.5(7)(b) of the Act:

a. The following records shall be maintained for to document implementation of the leak detection and repair program required by Condition 7.5.8(a):

i. A record of each inspection or other observation that identifies a leaking component, including, date, the individual that performed the inspection, and the type of inspection;

ii. The condition, i.e., idle or operation, of each pump or compressor inspected;

iii. The presence of a leak, with description and the means of identification;

iv. The date the leak was repaired, or the component taken out of service; and

v. If a corrective action, as in Condition 7.5.8(a), was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

b. The Permittee shall maintain records of the following items for each exceedance of the limits in Conditions 7.5.3, 7.5.5, or 7.5.6, which shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected equipment with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall notify the Illinois EPA within 30 days of an exceedance of the limits in Conditions 7.5.3, 7.5.5, or 7.5.6. The notification shall include:

i. Identification of the limit that may have been exceeded.

ii. Duration of the possible exceedance.

iii. An estimate of the amount of emissions in excess of the applicable standard.

iv. A description of the cause of the possible exceedance.

v. When compliance was reestablished.

b. The Permittee shall submit the following information along with its annual emission report:

i. A summary of exceedances of the limits in Conditions 7.5.3, 7.5.5, or 7.5.6, if any, which required notification to the Compliance Section in accordance with Condition 7.5.10(a).

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected equipment without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.5.12 Compliance Procedures

a. Compliance with Condition 7.5.3(c) (35 IAC 218.142) shall be assured as long as the Permittee complies with the monitoring requirements in Condition 7.5.8(a) and the recordkeeping requirements in Condition 7.5.9(a).

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____**{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as

not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 (“Title I provisions”) and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or

denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

   i. At reasonable times, for the purposes of assuring permit compliance; or

   ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Storage Tank Features and Groupings

TABLE 1-1

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Group 1							
Tank T1	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T2	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T3	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T4	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T6	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T8	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T9	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T10	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T11	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T19	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T20	40,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T21	2,350,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T23	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T25	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T26	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T27	62,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T29	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T30	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T31	100,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T32	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T33	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T34	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T35	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T36	672,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T37	3,402,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T38	155,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T39	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T40	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T41	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T43	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T44	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T45	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T46	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T47	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T48	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T49	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T50	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T51	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T52	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T53	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T54	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T55	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T56	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T57	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T58	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T59	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T100	44,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T102	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T104	630,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T105	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T106	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T107	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T108	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T109	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T110	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T111	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T112	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T113	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T114	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T115	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T116	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T118	24,500	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T119	24,500	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T120	110,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T121	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T122	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T123	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T124	100,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T125	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T126	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T127	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T128	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T129	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T130	108,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T132	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T133	108,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T134	128,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T135	12,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T136	12,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T137	12,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T138	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T139	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T140	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T141	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T142	420,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T143	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T144	1,050,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T145	250,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T146	250,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T147	1,400,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T148	1,400,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T149	780,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T150	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T151	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T152	880,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T153	880,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T154	110,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T155	150,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T156	250,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T157	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T158	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T159	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T160	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T161	250,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T162	38,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T163	38,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T164	57,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T165	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T166	110,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T167	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T168	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T169	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T170	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T171	150,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T172	12,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T173	12,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T174	12,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T175	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T176	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T177	12,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T178	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T179	110,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T180	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T181	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T182	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T183	20,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T184	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T185	4,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T186	140,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T187	140,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T188	140,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T189	140,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T190	140,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T191	140,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T192	40,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T193	40,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T194	40,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T200	58,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T202	125,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T301	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T302	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T303	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T304	319,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T305	318,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T306	214,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T307	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T308	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T309	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T310	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T311	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T312	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T313	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T314	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T315	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T316	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T317	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T318	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T319	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T320	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T321	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T322	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T323	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T324	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T325	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T326	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T327	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T328	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T329	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T330	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T331	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T332	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T333	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T334	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T335	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T336	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T337	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T338	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T339	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T340	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T341	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T342	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T343	50,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T344	100,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T345	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T346	100,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T347	100,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T348	12,500	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T349	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T350	80,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T351	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T352	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T353	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T354	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T355	31,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T356	31,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T357	31,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T358	31,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T359	31,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank T360	31,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T361	25,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T362	25,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank T363	25,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A1	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A2	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A3	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A4	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Tank A5	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A6	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A7	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A8	30,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A9	15,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972
Tank A10	5,000	Fixed	None	None	Various Chemical Products	0.75	pre-1972

Group/Tank #	Capacity (Barrels)	Tank Type	Primary Seal	Secondary Seal	Material Stored	Expected Max. Vapor Pressure (psia at 70°F)	Date Constructed
Group 2							
Tank T42	420,000	Internal floating roof	Vapor-mounted resilient	None	Various Chemical Products	11.1	pre-1972
Tank T103	395,000	Internal floating roof	Vapor-mounted resilient	None	Various Chemical Products	11.1	pre-1972
Tank T131	250,000	Internal floating roof	Vapor-mounted resilient	None	Various Chemical Products	11.1	pre-1972
Tank T201	45,000	Internal floating roof	Vapor-mounted resilient	None	Various Chemical Products	11.1	pre-1972

10.2 Attachment 2 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

NAF:psj