

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Marathon Ashland Petroleum LLC Willow Spring Terminal  
I.D. No.: 031327AAJ  
Application No.: 95060012  
December 6, 1999

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Mannheim Terminal and Warehousing Service Company  
Attn: David Siebold, Environmental Supervisor  
539 South Main Street  
Findlay, Ohio 45840

<u>Application No.:</u> 95060012	<u>I.D. No.:</u> 031327AAJ
<u>Applicant's Designation:</u>	<u>Date Received:</u> June 6, 1995
<u>Operation of:</u> Petroleum Bulk Terminal	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date:</u> DATE
<u>Source Location:</u> 7600 LaGrange Road, Willow Springs, Cook County	
<u>Responsible Official:</u> Fred Adams, Manager of Logistics and Terminals	

This permit is hereby granted to the above-designated Permittee to OPERATE a petroleum bulk 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 Mike Davidson at 217/782-2113.

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

DES:MED:jar

cc: Illinois EPA, FOS, Region 1  
USEPA

<sup>1</sup> 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.

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Marathon Ashland Petroleum, LLC - Willow Springs Terminal  
7600 LaGrange Road  
Willow Springs, Illinois 60480  
708/839-5220

I.D. No.: 031327AAJ  
Standard Industrial Classification: 5171, Petroleum Bulk Stations  
and Terminals

1.2 Owner/Parent Company

Mannheim Terminal and Warehousing Service Company  
539 South Main Street  
Findlay, Ohio 45840

1.3 Operator

Marathon Ashland Petroleum, LLC  
539 South Main Street  
Findlay, Ohio 45840

David Siebold, Environmental Supervisor  
419/421-2629

1.4 General Source Description

The Marathon Ashland Petroleum, LLC - Willow Springs Terminal is located at 7600 LaGrange Road. The source is a petroleum bulk terminal for various petroleum products. Materials are transferred to the terminal by pipeline where they may be temporarily stored at the source prior to shipment of the material to different destinations via the pipeline, or distributed to petroleum bulk plants or gasoline dispensing operations located within the surrounding community by way of truck. A truck loading rack is used for this purpose.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
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
ATUs	Allotment Trading Units
BAT	Best Available Technology
bbl	Barrel
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
Cu in	cubic inch
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft <sup>3</sup>	cubic foot
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IFR	Internal Floating Roof
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kg	kilogram
kPa	kilopascals
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
m <sup>3</sup>	Cubic meters
m	meter
MACT	Maximum Achievable Control Technology
mg	Milligram
mm	Millimeter
mmBtu	Million British thermal units
mmBtu/hr	Million Btus per hour
ml	milliliter
mo	Month

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MSDS	Material Safety Data Sheet
MTBE	Methyl tert-Butyl Ether
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OL	Organic Liquid
OM	Organic Material
PM	Particulate Matter
PM <sub>10</sub>	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
psi	Pounds per square inch
psia	Pounds per square inch absolute
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO <sub>2</sub>	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
TANKS	USEPA Emission Estimating Program for Storage Tanks
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VCU	Vapor Combustion Unit
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
wt	Weight
yr	year

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:

An additive storage tank (AA-1-5) used to store gasoline additives and fuel oil additives having VOM emissions of less than 1.0 lb/hr and individual HAP emissions of less than 0.1 lb/hr;

One groundwater remediation system having VOM emissions of less than 1.0 lb/hr and individual HAP emissions of less than 0.1 lb/hr; and

Two Air Sparging Equipment Tanks (WB-10-1 and WB-10-2) having VOM emissions of less than 1.0 lb/hr and individual HAP emissions of less than 0.1 lb/hr.

- 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)].

- 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	Emission Control Equipment
Group 1 Storage Tanks (See Attachment 1 for Details)	Fixed Roof Storage Tanks with a Capacity of 40,000 Gallons or Less Storing Various Petroleum Liquids	Permanent Submerged Fill
Group 2 Storage Tanks (See Attachment 1 for Details)	Fixed Roof Storage Tanks with a Capacity Greater Than 40,000 Gallons That Store Organic Material with a Vapor Pressure Less Than 0.5 Psia	Permanent Submerged Fill
Group 3 Storage Tanks (See Attachment 1 for Details)	Internal Floating Roof Storage Tanks - (Ethanol Storage)	Floating Roof with Primary Seal and Permanent Submerged Fill
Group 4 Storage Tanks (See Attachment 1 for Details)	Existing Internal Floating Roof Storage Tanks - Not Subject to 40 CFR 60 Subpart K Or Kb (Petroleum Products Storage)	Floating Roof with Primary Seal and Permanent Submerged Fill
Group 5 Storage Tanks (See Attachment 1 for Details)	External Floating Roof Storage Tanks That Require a Rim-Mounted Secondary Seal	Floating Roof and Permanent Submerged Fill
Group 6 Storage Tanks (See Attachment 1 for Details)	Internal Floating Roof Storage Tanks - Subject to 40 CFR 60 Subpart K	Floating Roof with Shoe Mounted Primary Seal and Permanent Submerged Fill
Tank Truck Loading Rack	Four Bay Petroleum Product Truck Loading Rack	Carbon Adsorption Unit with Backup Portable Combustion Unit
Fugitive Emissions	Piping, Valves, and Pumps Used to Transfer Materials Between the Pipe Line Storage Tanks and Loading/Unloading Rack	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 Based on the potential to emit, the source would be major for HAPs. However, as a consequence of the federally enforceable emission limitations established in Section 7.7 limiting the emissions of VOM and HAP from the loading rack, 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. 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.
  - c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

- 5.2.3 Pursuant to 35 IAC 218.585(a), (b), and (c), during the regulatory control periods of May 1 to September 15 of each year, no person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline, that has a Reid vapor pressure in excess of the following:
- a. Gasoline shall not exceed 9.0 psi (62.07 kPa); and
  - b. Ethanol blend gasoline's shall not exceed the limitations of (a) above by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline.
- 5.2.4 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.
- 5.2.5 Risk Management Plan
- Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:
- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.
- 5.2.6
- 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.
- 5.2.7 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.

#### 5.3 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the source not being subject to 40 CFR 63, Subpart R because the source is not a major source of HAPs. [40 CFR Section 63.420(b)(2)] (See also Condition 5.5)
- b. This permit is issued based on the source not being subject to 40 CFR 61, Subpart J because the pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source are not in benzene service as defined in 40 CFR 61.111. (See also Condition 5.4)
- c. This permit is issued based on the source not being subject to 40 CFR 61, Subpart V because pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels at the source are not in volatile hazardous air pollutant service as defined in 40 CFR 61.241. (See also Condition 5.4)
- d. This permit is issued based on the source not being subject to 40 CFR 63, Subpart R, Y, and OO because the aggregate actual HAP emissions from the source is less than 10 tons of each individual HAP and 25 tons for all HAPs. (See also Condition 5.5.)
- e. This permit is issued based on the source not being subject to 40 CFR 68, because the materials stored at the

source are fuels that are in distribution for use as fuel for internal combustion engines.

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:

- a. The pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source shall not be used to process, store, unload or load any of the following:
  - i. A VOL containing vinyl chloride or benzene in excess of 10 percent by weight.

These limits are being established, pursuant to a request by the Permittee, in order to demonstrate the non-applicability of the rules referenced in Condition 5.3.

- b. The Permittee shall inspect pumps and compressors for leaks on at least a monthly 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 within 15 days.
- c. During the regulatory control period, May 1 through September 15 of each year, the Permittee shall state that the Reid vapor pressure of all gasoline or ethanol blends leaving the source for use in Illinois complies with the Reid vapor limitations of Condition 5.2.3. Any operation receiving this gasoline shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 218.585(b) and (c) (Condition 5.2.3).
- d. The Permittee shall not exceed the following source wide limits
  - i. The MTBE concentration of reformulated and conventional gasoline at the source shall not exceed an annual average concentration of 11.9%. Based upon

the analysis provided in the application MTBE in the primary HAP of concern in gasoline.

ii. Source-wide Gasoline Throughput Limitation:

Gasoline Throughput (gal/day)	Gasoline Throughput (gal/year)
46,800,000	468,000,000

These limits are being established, pursuant to a request by the Permittee, in order to demonstrate the source is not a major source for HAPs as referenced in Condition 5.5.2. Compliance with these limits shall be assured through the recordkeeping, reporting and compliance procedures shown in Conditions 5.6, 5.7, and 5.9, respectively.

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, at this location, 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)	79.4
Sulfur Dioxide (SO <sub>2</sub> )	---
Particulate Matter (PM)	---
Nitrogen Oxides (NO <sub>x</sub> )	---
HAP, not included in VOM or PM	---
TOTAL	79.4

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 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 and handling of that liquid, as determined by the current version of the TANKS program.

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 R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) 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 General Records for Storage Tanks

- a. The Permittee shall maintain a log identifying which unit-specific condition (Condition 7.1, 7.2, 7.3, 7.4, 7.5, or 7.6 of this permit) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.

- b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m<sup>3</sup> (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.
    - i. The date\* on which construction of the tank was commenced, with a copy of supporting documentation;
    - ii. The date(s)\* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, were commenced on the tank, if applicable;
    - iii. A list of the types of VOL actually stored in the tank and anticipated to be stored in the tank, with date of each change in the list; and
    - iv. The dimensions of the tank and an analysis of capacity. [35 IAC 218.129(f) and 40 CFR 60.116b(b)]
- \* If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

#### 5.6.3 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the storage tanks at the source so as to demonstrate compliance with the annual emission limits in Condition 5.5. These records shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

- a. The color of each storage tank;
- b. The condition of each storage tank; and
- c. The type and number of fittings.

5.6.4 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to allow verification that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63 Subpart R and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5:

- a. The Permittee shall maintain the following general records:
  - i. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;
  - ii. The vapor weight percent of each HAP in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey;
  - iii. A copy of the supporting documentation for HAP vapor weight percent; and
  - iv. A current analysis of the tank or tanks in each group that would have the greatest emissions from storage of various liquids in the event that the Permittee does not choose to keep throughput records by individual tank, to identify the tank that should be assumed for emission calculations.
- b. The Permittee shall maintain records of the following items:
  - i. Monthly throughputs of each organic liquid through each tank or group of tanks;
  - ii. The annual source wide throughputs calculated by totaling the applicable throughputs for each specific organic liquid for the previous 12 months, with supporting calculations.
  - iii. For each HAP identified as present, the total emissions of the individual HAP for all

emission units at the source, in tons/month,  
with supporting calculations; and

- iv. Total emissions of each individual HAP, and combined HAPs from the source, in tons/month, with supporting calculations.

#### 5.6.5 Records for Operating Scenarios

If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F as provided for in Condition 5.8, the Permittee shall maintain a log identifying the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.

#### 5.6.6 Records for Pump and Compressor Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4.

- a. The performance of an inspection or other observation identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;
- b. The condition, i.e., idle or operation, of each pump or compressor inspected;
- c. The presence of a leak, with description and the means of identification;
- d. The date the leak was repaired, or the component taken out of service; and
- e. If a corrective action, as in Condition 5.4, was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

#### 5.6.7 Records for Gasoline Volatility

Pursuant to 35 IAC 218.585(h)(2), the Permittee shall maintain records of the following items for gasoline and ethanol blends leaving the source for use in Illinois:

- a. Reid vapor pressure of each gasoline or ethanol blend shipment;

- b. Quantity of each gasoline or ethanol blend shipment;  
and
- c. Date of delivery of each shipment.

5.6.8 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:

Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1 and 5.5.2.

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 Emission 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 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 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

- a. The Permittee is authorized to store materials with a vapor pressure less than 0.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any storage tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.0 of this permit applicable to such tank based on the storage of VPL shall no longer apply. 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 an emission unit, as defined in 35 IAC 201.102.
- b. Upon resuming storage of VPL in such a tank, the applicable unit-specific conditions of Section 7.0 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct applicable inspection of the tank for storage of VPL.

#### 5.9 General Compliance Procedures

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.

- a. Available data on the storage temperature may be used to determine the maximum true vapor pressure (See Condition 7). [35 IAC 218.128(b)]
  - 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.
  - ii. For other liquids, the vapor pressure shall be:
    - A. Determined by ASTM Method D2879-83, incorporated by reference at Section 218.112(a)(1) of this Part;
    - B. Measured by an appropriate method approved by the Illinois EPA and USEPA; or
    - C. Calculated by an appropriate method approved by the Illinois EPA and USEPA.
- b. For the purpose of estimating VOM emissions from the storage tanks, the most current version of the TANKS program is acceptable.
- c. For the purpose of estimating fugitive VOM emissions from components at the source, the emission factors found in API Publication No. 4588, "Development of Fugitive Emission Factors and Emission Profiles for Petroleum Marketing Terminals, Vol. 1, 1993".
- d. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable.
- e. Total VOM and HAP emissions at the source shall be determined as the sum of the respective VOM and HAP emissions from the tanks (Conditions 7.1 through 7.6), the

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loading rack (Condition 7.7) and fugitives (Condition  
7.8).

#### 5.10 Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 218.142 as Condition 5.4 establishes appropriate compliance procedures for this rule that do not rely on such measurements.

## 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 shall 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

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
  - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

#### 6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
  - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
  - i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit,

including any supporting documentation and calculations;

- iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
  - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
  - vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

#### 6.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 221 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 25.0974 tons per season.
  - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
  - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs

will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

- v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

- b. Contingent Allotments for New or Modified Emission Units

Not applicable.

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

#### 6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

#### 6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
  - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
  - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Group 1 Storage Tanks  
 Fixed roof storage tanks with a capacity of less than 40,000 gallons storing various petroleum liquids

7.1.1 Descriptions

The Permittee operates fixed roof storage tanks to store various petroleum products. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
T-1	Fixed Roof Tank	Permanent Submerged Loading Pipe
T-2	Fixed Roof Tank	Permanent Submerged Loading Pipe
T-3	Fixed Roof Tank	Permanent Submerged Loading Pipe
T-4	Fixed Roof Tank	Permanent Submerged Loading Pipe
AA-8-1	Fixed Roof Tank	Permanent Submerged Loading Pipe
AA-8-2	Fixed Roof Tank	Permanent Submerged Loading Pipe
AA-1-3	Fixed Roof Tank	Permanent Submerged Loading Pipe
AA-2-4	Fixed Roof Tank	Permanent Submerged Loading Pipe

7.1.3 Applicability Provisions

An "affected tank," for the purpose of these unit-specific conditions, is a fixed roof storage tank with a capacity of less than or equal to 40,000 gallons that is only subject to 35 IAC 218.122(b). A storage tank is subject to the requirements of 35 IAC 218.122(b) if the tank has a capacity greater than 250 gallons and is used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.1.2. The

status of all storage tanks at this source, including affected tanks, is summarized in Attachment 1.

#### 7.1.4 Non-Applicable Regulations

- a. An affected tank is not subject to the requirements of 40 CFR 60 Subparts K, Ka or Kb, because the tank capacity is below the applicability cutoff shown in the respective NSPS for Storage Vessels for Petroleum Liquids. [40 CFR 60.110(a), 60.110a(a), and 60.110b(a)]
- b. An affected tank is not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, because the tank capacity is less than 40,000 gallons. [35 IAC 218.119(a)]
- c. An affected tank is not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, because the tank capacity is less than 40,000 gallons. [35 IAC 218.121]
- d. An affected tank is not subject to the requirements of 35 IAC 218.123, Petroleum Liquid Storage Tanks, because the tank capacity is less than 40,000 gallons. [35 IAC 218.123(a)(2)]
- e. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]

#### 7.1.5 Control Requirements

Each affected tank shall be equipped and operated with a permanent submerged loading pipe, pursuant to 35 IAC 218.122(b). (The Illinois EPA has not approved use of other equivalent equipment in lieu of a permanent submerged loading pipe.)

#### 7.1.6 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:

N/A

7.1.7 Operating Requirements

None

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.1.7 pursuant to Section 39.5(7)(b) of the Act:

- a. Design information for the tank showing the presence of a permanent submerged loading pipe; and
- b. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Any storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.1.5(a), e.g., no "permanent submerged loading pipe," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
- b. Any storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.1.5(a)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions

taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

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 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.

7.1.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.2 Unit Group 2 Storage Tanks  
Fixed roof storage tanks with a capacity greater than 40,000 gallons that store organic material with a vapor pressure less than 0.5 psia

7.2.1 Descriptions

The Permittee operates fixed roof storage tanks to store distillate fuels. Permanent submerged loading is used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
27-13	Fixed Roof Tank	Permanent Submerged Loading Pipe
13-14	Fixed Roof Tank	Permanent Submerged Loading Pipe
55-15	Fixed Roof Tank	Permanent Submerged Loading Pipe

7.2.3 Applicability Provisions

An "affected tank" for the purpose of these unit-specific conditions, is a fixed roof storage tanks with a capacity greater than 40,000 gallons that is used to store organic liquid with a maximum true vapor pressure of less than 0.5 psia.

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.2.2. The status of all storage tanks at this source, including affected tanks, is summarized in Attachment 1.

7.2.4 Non-Applicable Regulations

- a. An affected tank is not subject to the requirements of 40 CFR 60 Subparts K, Ka or Kb, because the tank was constructed prior to the applicability dates of the NSPS for Storage Vessels for Petroleum Liquids. . [40 CFR 60.110(a), 60.110a(a), and 60.110b(a)]
- b. An affected tank is not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, because the vapor pressure of VOLs stored in the tank is less than 0.5 psia (See Condition 7.2.7). [35 IAC 218.119(a)]

- c. An affected tank is not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, because the petroleum liquid stored in the tank does meet the definition for volatile petroleum liquid, as per 35 IAC 211.7170. [35 IAC 218.121]
- d. An affected tank is not subject to the requirements of 35 IAC 218.122, Loading Operations, if no odor nuisance exists the limitations of 35 IAC 218.122 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)]
- e. An affected tank is not subject to the requirements of 35 IAC 218.123, Petroleum Liquid Storage Tanks, because the petroleum liquid stored in the tank does meet the definition for volatile petroleum liquid, as per 35 IAC 211.7170. [35 IAC 218.123(a)(6)]
- g. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]

7.2.5 Control Requirements

N/A

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:

N/A

7.2.7 Operating Requirements

Pursuant to Section 39.5(7)(a) of the Act and 35 IAC 218.119(a) the Permittee shall not store any organic material with a true vapor pressure of 0.5 psia or greater.

7.2.8 Inspection Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.2.7 pursuant to Section 39.5(7)(b) of the Act:

The storage of any organic liquid with a true vapor pressure greater than 0.5 psia.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Any storage of organic liquid with a true vapor pressure greater than 0.5 psia in an affected tank within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

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 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. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.

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- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.3 Group 3 Storage Tanks

Internal floating roof storage tanks - Ethanol Storage

7.3.1 Description

The Permittee operates an internal floating roof storage tank to store ethanol. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
13-7	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof

7.3.3 Applicability Provisions

An "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 218.120(a) and 218.122(b) that relies upon a permanent submerged loading pipe and internal floating roof for compliance. A storage tank is subject to the control requirements as follows:

- a. An affected storage tank is subject to the control requirements of 35 IAC 218.120(a) if it has a capacity greater than or equal to 40,000 gallons (151 m<sup>3</sup>) storing a VOL with a vapor pressure of 5.19 kPa (0.75 psia) or more but less than or equal to a maximum true vapor pressure of 76.52 kPa (11.1 psia). (Internal floating roof - 35 IAC 218.120(a)(1))
- b. Unless exempted pursuant to 35 IAC 218.122(c), an affected storage tank is subject to the control requirements of 35 IAC 218.122 with a storage capacity of greater than 250 gal is required to be equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA. The Illinois EPA has not approved any alternative control. (Submerged Loading Pipe - 35 IAC 218.122(b))

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.3.2. The status of all storage tanks at

this source, including affected tanks is summarized in Attachment 1.

#### 7.3.4 Non-Applicable Regulations

- a. Each affected storage tank is not subject to the requirements of 40 CFR 60 Subpart K, Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.
- b. An affected tank is not subject to the limitations of 35 IAC 218.121 - Storage Containers of VPL and 35 IAC 218.123 - Petroleum Liquid Storage Tanks, because the tanks are used solely for the storage of VOLs not defined as petroleum liquids (See Condition 7.3.7(a)). [35 IAC 218.121 and 218.123(6)]
- c. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]

#### 7.3.5 Control Requirements

Each affected tank shall be equipped with an internal floating roof that meets the following specifications:

- a. An internal floating roof that 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)]
- b. Each internal floating roof, used to store VOLs (See Condition 7.3.7), 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 [35 IAC 218.120(a)(1)(B)]:
  - i. 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;

- ii. 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
  - iii. 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.
- c. Each opening in a non-contact 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)]
  - d. 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)]
  - e. 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)]
  - f. 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)]

- g. 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)] and
- h. A permanent submerged loading pipe. [35 IAC 218.122(b)]

7.3.6 Emission Limitations

- a. In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected emission units, storage tank 13-7, is subject to the following:

Emissions from the affected storage tanks, Storage Tank 13-7, shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.07	0.72

These limits are based on the operational limits referenced in Condition 7.3.7 and the compliance procedures referenced in Condition 7.3.12.

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).

The above limitations contain revisions to previously issued Permit 73040102. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the

primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the previous emissions limitations on Storage Tank 13-7, as established in Permit 73040102, i.e., the previous limit of 0.1 lb/hr and 0.44 ton/year, has been revised based upon the latest USEPA calculation procedures (TANKS program) and the maximum VOL throughputs indicated in the CAAPP application. [T1R].

- b. There are also source wide limitations in Condition 5.5 that include this unit.

7.3.7 Operating Requirements

- a. Each affected tank is limited to the storage of ethanol.
- b. Operation of the Storage Tank 13-7 shall not exceed the following limits:

VOL Throughput	
<u>(gal/month)</u>	<u>(gal/year)</u>
1,000,000	10,000,000

These limits are based on the recordkeeping requirements in Condition 7.3.9 and the compliance procedures referenced in Condition 7.3.12.

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).

The above limitations contain revisions to previously issued Permit 73040102. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits

continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the previous emissions limitations on Storage Tank 13-7, as established in Permit 73040102 has no limitation on VOL throughput. This limit has been revised based upon the maximum VOL throughputs indicated in the CAAPP application. [T1R].

7.3.8 Inspection and Monitoring Requirements

- a. For each affected storage tank, the Permittee shall:
  - i. 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 owner or operator shall repair the items before filling the storage vessel. [35 IAC 218.127(a)(1)]
  - ii. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the Permittee shall 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. 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 owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure is detected during the required inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the owner or operator may request a 30-day extension from the Illinois EPA in the inspection report required in

- Condition 7.3.10. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the owner or operator will take that will assure that the control equipment will be repaired or the vessel will be emptied within 60 days. [35 IAC 218.127(a)(2)]
- iii. For vessels equipped with both primary and secondary seals, the Permittee shall visually inspect the affected storage tanks as follows: [35 IAC 218.127(a)(3)]
- A. Visually inspect the vessel as specified in Condition 7.3.8(a)(iv) below at least every 5 years; or
- B. Visually inspect the vessel as specified in Condition 7.3.8(a)(ii) above.
- iv. The Permittee shall 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 owner or operator shall repair the items as necessary so that none of the conditions specified above 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 Condition 7.3.8(a)(ii) and 7.3.8(a)(iii)(B) above and at intervals no greater than 5 years in the case of vessels specified in Condition 7.3.8(a)(iii)(A) above. [35 IAC 218.127(a)(4)]

7.3.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank:
  - i. A list of the types of VOLs stored on a monthly basis;
  - ii. The maximum true vapor pressure of each type of VOL as stored, psia; and
  - iii. The results of any inspections or measurements required by the Condition 7.3.8, including:  
[35 IAC 218.129(a)(2)]
    - A. Type of inspection;
    - B. When the inspection and/or measurement was performed;
    - C. Who performed the inspection and/or measurement;
    - D. The method of inspection and/or measurement;
    - E. The observed condition of each feature of the internal floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
    - F. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.3.8 [35 IAC 218.129]:

Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

7.3.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each affected storage tank for which an inspection is required by Condition 7.3.8(a)(i) and (a)(iv) above to afford the Illinois EPA the opportunity to have an observer present. If the inspection, required by Condition 7.3.8(a)(iv) above, is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Illinois EPA 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 Illinois EPA at least 7 days prior to the refilling. [35 IAC 218.127(a)(5)]
- b. The Permittee shall, if any of the conditions described in Condition 7.3.8(a)(ii) are detected during the annual visual inspection required by 7.3.8(a)(ii), report to the Illinois EPA 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)]
- c. The Permittee shall, after each inspection required by Condition 7.3.8(a)(iii) of this Subpart 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 7.3.8(a)(iii)(B) (35 IAC 218.127(a)(2)) are discovered, report to the Illinois EPA within 30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of Condition 7.3.5 or 7.3.8, and list each repair made. [35 IAC 218.129(a)(4)]
- d. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control, operating, or inspection requirements, as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- i. Any storage of VOL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.3.5, e.g., "no permanent submerged loading pipe," within 5 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
- ii. Any storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.3.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
- iii. Any storage of VOLs other than those specified in Condition 7.3.7.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected 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:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.3 of this permit.
- b. Changes in seal type and configuration, made during the course of normal repair and maintenance of an affected storage tank's floating roof, provided the tank continues to comply with the Conditions in Section 7.3 of this permit.
- c. Changes accounted for in Condition 5.8.

7.3.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.4 Group 4 Storage Tanks

Existing Internal floating roof storage tanks - Not Subject to 40 CFR 60 Subpart K or Kb (Petroleum Products Storage)

7.4.1 Description

The Permittee operates internal floating roof storage tanks to store various petroleum products. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.4.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
27-5	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
27-6	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
27-12	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
55-8	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
13-10	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof

7.4.3 Applicability Provisions

An "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 218.121, 218.122(b), and 218.123 that relies upon a permanent submerged loading pipe and internal floating roof for compliance. A storage tank is subject to the control requirements as follows:

- a. An affected storage tank is subject to the control requirements of 35 IAC 218.121 if it has a capacity greater than or equal to 40,000 gallons (151 m<sup>3</sup>) storing a VPL with a vapor pressure of 10.34 kPa (1.5 psia) or greater at 294.3 °K (70 °F). [Internal floating roof - 35 IAC 218.121(b)(1)]
- b. Unless exempted pursuant to 35 IAC 218.122(c), an affected storage tank is subject to the control

requirements of 35 IAC 218.122 with a storage capacity of greater than 250 gal is required to be equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA. The Illinois EPA has not approved any alternative control. [Submerged Loading Pipe - 35 IAC 218.122(b)]

- c. Unless exempted pursuant to 35 IAC 218.123(a), an affected storage tank that stores volatile petroleum liquid is subject to the control requirements of 35 IAC 218.123(b). [Petroleum Liquid Storage Tanks - 35 IAC 218.123(b)]

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.4.2. The status of all storage tanks at this source, including affected tanks is summarized in Attachment 1.

#### 7.4.4 Non-Applicable Regulations

- a. Each affected storage tank is not subject to the requirements of 40 CFR 60 Subpart K, Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.
- b. An affected tank is not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, because the tanks are used solely for the storage of petroleum liquids (See Condition 7.4.7). [35 IAC 218.119(e)]
- c. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]

#### 7.4.5 Control Requirements

The Permittee shall not cause or allow the storage of any volatile petroleum liquid in an affected tank unless:

- a. The affected tank is equipped with a floating roof which rests on the surface of the VPL. The floating roof shall be equipped with a closure seal or seals between the roof edge and the tank wall. No person shall cause or allow the emission of air contaminants into the atmosphere from any gauging or sampling

devices attached to such tanks, except during sampling or maintenance operations. [35 IAC 218.121(b)(1)];

- b. There are no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)]
- c. All openings of any floating roof deck, except stub drains, are equipped with covers, lids or seals such that: [35 IAC 218.123(b)(3)];
  - i. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank;
  - ii. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
  - iii. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting;
- d. The affected tank is equipped with a permanent submerged loading pipe. [35 IAC 218.122(b)]

#### 7.4.6 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:

N/A

#### 7.4.7 Operating Requirements

Each affected tank is limited to the storage of petroleum liquids as defined under 35 IAC 211.4610.

#### 7.4.8 Inspection and Monitoring Requirements

The Permittee shall not cause or allow the storage of any volatile petroleum liquid in an affected tank unless:

- a. Routine inspections of floating roof seals are conducted through roof hatches once every six months [35 IAC 218.123(b)(4)];

- b. A complete inspection of the cover and seal of any floating roof tank is made whenever the tank is emptied for reasons other than the transfer of petroleum liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b)(5)];

7.4.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank: [35 IAC 218.123(b)(6)]
  - i. A list of the types of volatile petroleum liquid stored on a monthly basis;
  - ii. The maximum true vapor pressure of each type of liquid as stored, psia; and
  - iii. The results of any inspections or measurements required by the Condition 7.4.8, including:
    - A. Type of inspection;
    - B. When the inspection and/or measurement was performed;
    - C. Who performed the inspection and/or measurement;
    - D. The method of inspection and/or measurement;
    - E. The observed condition of each feature of the internal floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
    - F. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.4.8 (Cover and Seal Inspection) [35 IAC 218.123(b)(6)]:

Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

#### 7.4.10 Reporting Requirements

- a. The Permittee shall promptly notify in writing at least 30 days prior to the filling or refilling of each affected storage tank for which an inspection is required by Condition 7.4.8(b) above to afford the Illinois EPA the opportunity to have an observer present. If the inspection, required by Condition 7.4.8(b) above, is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Illinois EPA 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 Illinois EPA at least 7 days prior to the refilling.
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control, operating, or inspection requirements, as follows pursuant to Section 39.5(7)(f)(ii) of the Act:
  - i. Any storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.4.5, e.g., "no permanent submerged loading pipe," within 5 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
  - ii. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.4.5) due to damage, deterioration, or other condition of the tank,

within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

- iii. Any storage of a non-petroleum liquid in an affected storage tank (See Condition 7.4.7).

#### 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 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:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.4 of this permit.
- b. Changes in seal type and configuration, made during the course of normal repair and maintenance of an affected storage tank's floating roof, provided the tank continues to comply with the Conditions in Section 7.4 of this permit.
- c. Changes accounted for in Condition 5.8.

#### 7.4.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.5 Unit Group 5 Storage Tanks  
 External floating roof storage tanks that require a rim-mounted secondary seal

7.5.1 Description

The Permittee operates external floating roof storage tanks that are required to have a rim mounted secondary seal to store various petroleum products. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.5.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
67-9	External Floating Roof Tank	Floating Roof, Metallic Shoe - Mounted Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe
67-11	External Floating Roof Tank	Floating Roof, Metallic Shoe - Mounted Primary Seal, Rim-Mounted Secondary Seal, and a Permanent Submerged Loading Pipe

7.5.3 Applicability Provisions

An "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 218.121, 218.122(b), 218.123 and 218.124 that relies upon a permanent submerged loading pipe and external floating roof for compliance. A storage tank is subject to the control requirements as follows:

- a. An affected storage tank is subject to the control requirements of 35 IAC 218.121 if it has a capacity greater than or equal to 40,000 gallons (151 m<sup>3</sup>) storing a VPL with a vapor pressure of 10.34 kPa (1.5 psia) or greater at 294.3 °K (70 °F). [Internal floating roof - 35 IAC 218.121(b)(1)]
- b. Unless exempted pursuant to 35 IAC 218.122(c), an affected storage tank is subject to the control requirements of 35 IAC 218.122 with a storage capacity of greater than 250 gal is required to be

equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA. The Illinois EPA has not approved any alternative control. [Submerged Loading Pipe - 35 IAC 218.122(b)]

- c. Unless exempted pursuant to 35 IAC 218.123(a), an affected storage tank that stores volatile petroleum liquid is subject to the control requirements of 35 IAC 218.123(b). [Petroleum Liquid Storage Tanks - 35 IAC 218.123(b)]
- d. Unless exempted pursuant to 35 IAC 218.124(b), an affected storage tank is subject to the control requirements of 35 IAC 218.124 if the tank is an external floating roof tank. [External Floating Roofs - 35 IAC 218.124]

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.5.2. The status of all storage tanks at this source, including affected tanks that are subject to 35 IAC 218.124(a), is summarized in Attachment 1.

#### 7.5.4 Non-Applicable Regulations

- a. Each affected storage tank is not subject to the requirements of 40 CFR 60 Subpart K, Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.
- b. An affected tank is not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, because the tanks are used solely for the storage of petroleum liquids (See Condition 7.5.7(b)). [35 IAC 218.119(e)]
- c. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]

#### 7.5.5 Control Requirements

The Permittee shall not cause or allow the storage of any volatile petroleum liquid in an affected tank unless:

- a. The affected tank is equipped with a floating roof which rests on the surface of the VPL. The floating roof shall be equipped with a closure seal or seals between the roof edge and the tank wall. No person shall cause or allow the emission of air contaminants into the atmosphere from any gauging or sampling devices attached to such tanks, except during sampling or maintenance operations. [35 IAC 218.121(b)(1)];
- b. There are no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)]
- c. All openings of any floating roof deck, except stub drains, are equipped with covers, lids or seals such that: [35 IAC 218.123(b)(3)];
  - i. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank;
  - ii. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
  - iii. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting;
- d. The floating roof has been equipped with a continuous seal extending from the floating roof to the tank wall (rim mounted secondary seal) [35 IAC 218.124(a)(1)] (The Illinois EPA has not approved use of other equivalent equipment in lieu of a rim mounted secondary seal.);
- e. Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers across at least 90 percent of the area of the opening; [35 IAC 218.124(a)(3)];
- f. Openings are equipped with projections into the tank which remain below the liquid surface at all times; [218.124(a)(4)]; and
- g. The affected tank is equipped with a permanent submerged loading pipe. [35 IAC 218.122(b)]

7.5.6 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:

N/A

7.5.7 Operating Requirements

The Permittee shall not cause or allow the storage of any volatile petroleum liquid in an affected tank unless:

- a. Each affected tank are operated so that the floating roof including the seal closure devices meet each of the following requirements:
  - i. The seal is intact and uniformly in place around the circumference of the floating roof between the floating roof and tank wall [35 IAC 218.124(a)(2)(A)]; and
  - ii. The accumulated area of gaps exceeding 0.32 centimeter (1/8 inch) in width between the secondary seal and the tank wall shall not exceed 21.2 square centimeters per meter of tank diameter (1.0 square inch per foot of tank diameter) [35 IAC 218.124(a)(2)(B)]
- b. Each affected tank is limited to the storage of petroleum liquids as defined under 35 IAC 211.4610.

7.5.8 Inspection Requirements

The Permittee shall not cause or allow the storage of any volatile petroleum liquid in an affected tank unless:

- a. Routine inspections of floating roof seals are conducted through roof hatches once every six months [35 IAC 218.123(b)(4)];
- b. A complete inspection of the cover and seal of any floating roof tank is made whenever the tank is emptied for reasons other than the transfer of petroleum liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b)(5)];

- c. Inspections are conducted prior to May 1 of each year to insure compliance with Conditions 7.5.5(d), (e), and (f) and 7.5.7(a); [35 IAC 218.124(a)(5)] (This inspection may be conducted concurrently with those required in Conditions 7.5.8(a) and (b))
- d.
  - i. The secondary seal gap is measured prior to May 1 of each year and within 30 days of a written request to demonstrate compliance with 35 IAC 218.124(a)(2)(B). This measurement shall be conducted in accordance with the methods and procedures specified in 40 CFR 60, Subpart Kb [35 IAC 218.124(a)(6)].
  - ii. Prior notification for the above measurements shall be given to the Illinois EPA as specified in Condition 7.5.10(b).

7.5.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank [35 IAC 218.123(b)(6) and 218.124(a)(7)]:
  - i. A list of the types of volatile petroleum liquid stored on a monthly basis;
  - ii. The maximum true vapor pressure of each type of liquid as stored, psia;
  - iii. The results of any inspections or measurements required by the Condition 7.5.8(a), (b) and/or (c), including:
    - A. Type of inspection;
    - B. When the inspection and/or measurement was performed;
    - C. Who performed the inspection and/or measurement;
    - D. The method of inspection and/or measurement;

- E. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
  - F. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.5.8(a) and (b) (Cover and Seal Inspection) [35 IAC 218.123(b)(6)]:

Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

#### 7.5.10 Reporting Requirements

- a. The Permittee shall promptly notify in writing at least 30 days prior to the filling or refilling of each affected storage tank for which an inspection is required by Condition 7.5.8(b) and (c) above to afford the Illinois EPA the opportunity to have an observer present. If the inspection, required by Condition 7.5.8(b) above, is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Illinois EPA 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 Illinois EPA at least 7 days prior to the refilling.
- b. The Permittee shall notify the Illinois EPA, Compliance Section and Regional Field Office, at least 30 days before the planned performance of seal gap measurements, pursuant to Section 39.5(7)(f) of the Act, so the Illinois EPA may observe the measurements.

- c. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control, operating, or inspection requirements, as follows pursuant to Section 39.5(7)(f)(ii) of the Act:
  - i. Any storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.5.5, e.g., "no rim-mounted secondary seal,") within 5 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
  - ii. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.5.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
  - iii. Any storage of a non-petroleum liquid in an affected storage tank (See Condition 7.5.7(b)).

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected 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:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.5 of this permit.
- b. Changes in seal type and configuration, made during the course of normal repair and maintenance of an

affected storage tank's floating roof, provided the tank continues to comply with the Conditions in Section 7.5 of this permit.

- c. Changes accounted for in Condition 5.8.

#### 7.5.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.6 Group 5 Storage Tanks

Internal floating roof storage tanks - Subject to 40 CFR 60 Subpart K

[Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978]

7.6.1 Description

The Permittee operates two new internal floating roof storage tank(s) to store gasoline. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.6.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
80-17	Internal Floating Roof Tank	Floating Roof, Shoe-Mounted Primary Seal, and a Permanent Submerged Loading Pipe

7.6.3 Applicability Provisions

- a. An "affected tank," for the purposes of these unit specific conditions is a storage tank that is subject to the control requirements of 40 CFR 60 Subpart K that relies on a floating roof for compliance. A storage tank constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978 with a capacity greater than or equal to 65,000 gallons (245.4 m<sup>3</sup>), or a storage tank constructed, reconstructed, or modified after March 8, 1974 and prior to May 19, 1978 with a capacity greater than or equal to 40,000 gallons (151 m<sup>3</sup>) but not greater than or equal to 65,000 gallons (245.4 m<sup>3</sup>), is subject to the requirements of 40 CFR 60 Subpart K if it stores a VOL with a maximum true vapor pressure equal to or greater than 78 mm Hg (1.5 psia), but not greater than 570 mm Hg (11.1 psia).

As of the "date issued" as shown on page 1 of this permit, the affected tank(s) are identified in Condition 7.6.2. The status of all storage tanks at this source, including affected tanks that are subject to 40 CFR 60 Subpart K, is summarized in Attachment 1.

- b. Unless exempted pursuant to 35 IAC 218.122(c), an affected storage tank is subject to the control requirements of 35 IAC 218.122 with a storage capacity of greater than 250 gal is required to be equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA. The Illinois EPA has not approved any alternative control. [Submerged Loading Pipe - 35 IAC 218.122(b)]
- c. Each storage tank subject to 40 CFR 60 Subpart K is hereby shielded from compliance with 35 IAC 218.121. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR 60, Subpart K assures compliance with 35 IAC 218.121, following the review requirements of 40 CFR 60 Subpart K and 35 IAC 218.121.

#### 7.6.4 Non-Applicable Regulations

- a. Each affected storage tank is not subject to the requirements of 40 CFR 60 Subpart Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.
- b. An affected tank is not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, because the tanks are used solely for the storage of petroleum liquids (See Condition 7.4.7(a)). [35 IAC 218.119(e)]
- c. An affected tank is not subject to the limitations of 35 IAC 218.123 - Petroleum Liquid Storage Tanks, because the tanks are subject to the NSPS - 40 CFR 60 Subpart K. [35 IAC 218.123(a)(5)]
- d. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]

#### 7.6.5 Control Requirements

- a. Each affected tank shall comply with the requirements of 40 CFR 60.112(a)(1), which requires the use of a floating roof if the true vapor pressure of the petroleum liquid, as stored, is equal to or greater

than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia).

- b. Each affected tank shall also be equipped with a permanent submerged loading pipe, pursuant to 35 IAC 218.122(b).

7.6.6 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:

N/A

7.6.7 Operating Requirements

- a. Each affected tank is limited to the storage of petroleum liquids as defined under 35 IAC 211.4610.
- b. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate each affected tank, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 60.11(d)]

7.6.8 Inspection Requirements

None

7.6.9 Recordkeeping Requirements

The Permittee shall keep the operating records required by 40 CFR 60.113(a) for each affected tank, as follows:

Records of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period. [40 CFR 60.113(a)]

Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517, unless the Illinois EPA specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor

pressure determined from the sample(s). [40 CFR  
60.113(b)]

#### 7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Any storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.6.5, e.g., no "floating roof," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
- b. Any storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.6.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
- c. Any storage of a non-petroleum liquid in an affected storage tank (See Condition 7.6.7(a)).

#### 7.6.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected 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:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.3 of this permit.

- b. Changes in seal type and configuration, made during the course of normal repair and maintenance of an affected storage tank's floating roof, provided the tank continues to comply with the Conditions in Section 7.3 of this permit.
- c. Changes accounted for in Condition 5.8.

7.6.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.7 Unit: Truck Loading Rack  
 Control: Carbon Adsorption Unit with Backup Portable Combustion Unit

7.7.1 Description

The truck loading/unloading rack is used to load and unload various petroleum products. The Permittee operates a loading rack that consists of four bays that include a total of four loading points. The VOM emissions from the truck loading/unloading rack occur when material is loaded into delivery vehicles. A vapor combustion unit is used to capture and control the emissions that occur as a result of displacement of vapors in the delivery vehicles. The VOM emissions from unloading material are accounted for in the working losses of the storage tanks that the material is loaded into, with the exception of fugitive emissions that are attributed to the components, i.e., valves, flanges, etc., associated with the truck loading stations.

Interface/Transmix is not considered to be gasoline since the material is generated during the changeover of products within the pipeline or liquids handling systems and it is not used as a fuel for internal combustion engines.

7.7.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date Of Construction
Loading Rack with Vapor Recovery	Four Bay Loading Rack Used for Loading Various Petroleum Products into Tank Trucks	Carbon Adsorption Unit with Backup Portable Combustion Unit	1958  Modified - Top Loading Replaced with Bottom Loading in 1975

7.7.3 Applicability Provisions and Applicable Regulations

An "affected loading rack," for the purpose of these unit-specific conditions, is a loading rack used to transfer organic materials into a tank truck or trailer, subject to the requirements of 35 IAC 218.122(a) and relies on the use submerged loading pipes for compliance.

An "affected loading rack," for the purpose of these unit-specific conditions, is a loading rack that is subject to the requirements of 35 IAC 218.582 and relies on a vapor collection/recovery unit for compliance. A "gasoline tank truck" is a delivery tank truck used at bulk gasoline terminals which is loading gasoline or has loaded gasoline on the immediately previous load. Each loading rack used to transfer gasoline into a delivery vessel (gasoline tank truck) from any bulk gasoline terminal is subject to the requirements of 35 IAC 218.582.

7.7.4 Non-Applicability of Regulations of Concern

- a. The affected loading rack was constructed in 1958 and modified in 1975 and hence will not be subject to the requirements of 40 CFR 60 Subpart XX because it was not constructed or modified after December 17, 1980, pursuant to the NSPS for Bulk Gasoline Terminals.
- b. The affected railroad tank truck and trailer loading racks are not be subject to 35 IAC Part 218, Subpart TT, because they are subject to 35 IAC 218, Subpart Y [35 IAC 218.980(a) and (b)]

7.7.5 Control Requirements and Operational Limitations

- a. The total organic compound emissions from the affected loading rack and associated vapor recovery unit shall not exceed 10 milligrams per liter of material loaded, pursuant to Sections 9.1(d) and 39 of the Act, so that the operation of this loading rack and vapor collection/recovery unit is not a major source for HAP subject to 40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).

This condition supercedes 35 IAC 218.582(a)(1) which requires that each affected loading rack be equipped and operated with a vapor control system that limits emissions of VOM to not more than 80 milligrams per liter (0.00067 lb/gal) of gasoline loaded from tank trucks during product loading.

- b. The Permittee shall not cause or allow the discharge of 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 into any 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 Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108. At the time of issuance of this permit, the Illinois EPA has not approved any alternative to the submerged loading pipes. [35 IAC 218.122(a)]

c. Source-wide Gasoline Throughput Limitation:

Gasoline Throughput	
(gal/day)	(gal/year)
46,800,000	468,000,000

These limits are being established, pursuant to the request of the Permittee, so that the operation of this loading rack and vapor collection/combustion unit is not a major source for HAP subject to 40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).

The above limitations were established in Permit 73040102, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). 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 the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.7.6 Emission Limitations

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

N/A

7.7.7 Operating Requirements

- a. The vapor control system shall be operated at all times during the loading of organic liquids and all vapors displaced in the loading of organic liquids are to be vented only to the vapor control system. This limitation is imposed based upon representations made in the applications.

- b. At all times during the loading of gasoline into any delivery vessel, the vapor control system shall operate and all vapors displaced in the loading of gasoline are to be vented only to the vapor control system. [35 IAC 218.582(a)(2)]
- c. There shall be no liquid drainage from the loading device of an affected loading rack when it is not in use. [35 IAC 218.582(a)(3)]
- d. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with an affected loading rack. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection. [35 IAC 218.582(b)(2), 218.582(b)(1)(A) and (C)]
- e. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B, incorporated by reference in 35 IAC 218.112. [35 IAC 218.582(b)(1)(B)]
- f. All loading and vapor return lines shall be equipped with fittings that are vapor tight. [35 IAC 218.582(a)(4)]
- g. No person shall cause or allow the transfer of gasoline into a delivery vessel from an affected loading rack unless the delivery vessel displays the appropriate sticker pursuant to 35 IAC 218.584(b) or (d) or the delivery vessel has provided a current certification as required by 35 IAC 218.584(c)(3), and the delivery vessel meets the following requirements [35 IAC 218.582(a)(5)]:
  - i. Includes a vapor space connection that is equipped with fittings that are vapor tight;
  - ii. Has its hatches closed at all times during loading or unloading operations, unless a top loading vapor recovery system is used;

- iii. Does not internally exceed a gauge pressure of 18 inches of water or a vacuum of 6 inches of water;
- iv. Is designed and maintained to be vapor tight at all times during normal operations;
- v. Are tested annually in accordance with Method 27, 40 CFR 60, Appendix A. Each vessel must be repaired and retested within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, when it fails to sustain:
  - A. A pressure drop of no more than three inches of water in five minutes; and
  - B. A vacuum drop of no more than three inches of water in five minutes.

7.7.8 Inspection and Monitoring Requirements

- a. Continuous monitoring equipment installed, calibrated, maintained and operated according to vendor specifications shall be used at all times the carbon adsorption unit is in use. The continuous monitoring equipment must monitor the VOM concentration of each carbon adsorption bed exhaust or the exhaust of the bed next in sequence to be desorbed. [35 IAC 218.105(d)(2)(A)]
- b. A pilot flame shall be present at all times when loading occurs during operation of the portable flare unit. The pilot flame shall be monitored using a thermocouple or equivalent device to detect the presence of a flame. An affected loading rack must be shut down and not allow loading if a pilot flame is not detected in the associated vapor collection/combustion system.
- c. The portable flare unit shall be equipped with continuous temperature indicator and strip chart recorder or disk storage for the vapor control combustion system temperature. [35 IAC 218.105(d)(2)(A)(i)]
- d. The Permittee shall inspect all components of the vapor control system for leakage as follows:

- i. Pumps seals shall be visually inspected for leaks on at least a weekly basis.
- ii. All valves and the coupler that connects to the delivery vessel shall be inspected by a portable detection unit between the March 1<sup>st</sup> and April 30th of each year.
- iii. The component (e.g., pump, valves, coupler...etc.) shall be expeditiously repaired or taken out of service if a significant leak is detected by any means, including visual observation, smell or sound. For this purpose, action shall be considered expeditious if it occurs within 15 days.
- iv. All repaired components shall be reinspected within 3 months of the repair.

This limitation supercedes the inspection requirements of Condition 5.4(b).

#### 7.7.9 Recordkeeping Requirements

##### a. General Recordkeeping

The Permittee shall maintain records of the following for each affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.7.5(c), and 7.7.6(a) and (b):

- i. The identification and properties of each organic liquid distributed through each affected loading rack, as related to emissions, i.e., storage temperature, vapor pressure and molecular weight;
- ii. The amount of each organic liquid distributed through each affected loading rack (including MTBE-based gasoline), gal/day, gal/month, and gal/year, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months;
- iii. Total annual emissions of VOM and HAP from the each affected loading rack calculated by totaling the applicable emissions for the previous 12 months, tons/year, with supporting

calculations. Emissions shall be calculated utilizing an approved USEPA methodology, such as Section 5.2 of the AP-42 and the control efficiency of a VCU as demonstrated in the most recent test (See Condition 7.7.12), with annual records updated each month by totaling the throughput for that month plus the preceding 11 months; and

b. Records of Operations

The Permittee shall maintain records of the following for the affected loading rack and associated vapor recovery unit to demonstrate compliance with Conditions 7.7.5 and 7.7.7:

- i. The use of an affected loading rack for loading of any gasoline tank truck when there was a malfunction and/or breakdown of the VCU or VRU, including:
  - A. The date and time of the loading;
  - B. The specific problem with the VCU or VRU;
  - C. Type of material loaded; and
  - D. The reason that loading occurred even though the VCU or VRU was malfunctioning.
- ii. The use of an affected loading rack for the loading of any nonvapor-tight gasoline tank (one not meeting the requirements of Condition 7.7.7) or a delivery vessel that does not display the appropriate sticker or has not provided a current certification (one not meeting the requirements of Condition 7.7.7), including:
  - A. The date and time of the loading;
  - B. The specific reason the vessel did not meet the requirements of Condition 7.7.7;
  - C. Type of material loaded; and
  - D. The reason why loading was allowed.

- iii. Implementation of the alternative vapor control scenarios (See Condition 7.7.11), including:
  - A. Identification of the scenario implemented;
  - B. The reason why the primary vapor control system (e.g., VRU) was shutdown; and
  - C. The date and time that the alternative operating scenario was implemented.
- iv. The VOM concentration of each carbon adsorption bed exhaust or the exhaust of the bed next in sequence to be desorbed.

c. Inspection Requirements

The Permittee shall keep the following records for each affected loading rack and associated vapor collection/combustion system which delivers liquid product into gasoline tank trucks.

A record of each leak inspection (Condition 7.7.8) shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

- i. Date of inspection;
- ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak);
- iii. Leak determination method;
- iv. Corrective action, including the date each leak was repaired and the reasons for any repair interval in excess of 15 days; and
- v. Name and signature of the person that performed the inspection.

d. Gasoline Tank Truck Records

The Permittee shall keep the following records for the gasoline tank trucks loaded at this terminal:

- i. The tank truck vapor tightness documentation and/or certification required under 35 IAC 218.584(c)(3) (Condition 7.7.7); and
- ii. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include as a minimum, the following information:
  - A. Test title: Gasoline Deliver Tank Pressure Test - EPA Reference Method 27;
  - B. Owner name and address;
  - C. Tank identification number;
  - D. Testing location;
  - E. Date of test;
  - F. Tester name and signature;
  - G. Witnessing inspector, if any: name, signature, and affiliation; and
  - H. Test results: Actual pressure change in 5 minutes, mm of water (average 2 runs).

#### 7.7.10 Reporting Requirements

##### a. Annual Report

The Permittee shall provide an annual report, to be submitted with the source's annual emission report, which includes the following:

- i. The monthly and annual throughputs for each affected loading rack for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 7.7.5(c), gallons/month and gallons/year (e.g., for the annual totals, for the month of January, the throughput from February of the preceding year through January, for the month of February, the throughput from March of the preceding

calendar year though February, 12 months in all);

- ii. The monthly and annual emissions of HAP attributable to the loading of petroleum products for each affected loading rack for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of HAPs (Condition 5.7.3), tons/month and tons/year (e.g., for the annual totals, for the month of January, the emissions from February of the preceding year through January, for the month of February, the emissions from March of the preceding calendar year though February, 12 months in all);; and
  - iii. Summarization of any use of an affected loading rack to load delivery vessels (gasoline tank trucks) into trucks that did not meet the requirements of Conditions 7.7.7, including:
    - A. The date and time of the loading;
    - B. The specific reason the vessel did not meet the requirements of Condition 7.7.7;
    - C. Type of material loaded; and
    - D. The reason why loading was allowed.
- b. Semi-Annual Reports

Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit a semi-annual report for any monitoring that is required. These reports shall be submitted by the end of January and July of each year and shall include the following information for the preceding 6 month period:

- i. Summary of any use of an affected loading rack when there was no pilot flame present in the associated VCU, or the VCU was not operating at the appropriate temperature, including:
  - A. Date and time of occurrence;

- B. Specific problem associated with the VCU or flame monitor;
  - C. Type of material being loaded; and
  - D. Reason why loading continued.
- ii. Summary of all times when the pilot flame was not detected or the vapor block valve failed to open including:
- A. Date and time of occurrence;
  - B. Specific problem, i.e., the pilot flame was out or a malfunction of the flame monitoring equipment; and
  - C. Supporting data, i.e., strip chart or disk.
- iii. Summary of times when the continuous temperature indicator and/or strip chart recorder or disk storage was not functioning, including:
- A. Date and time of occurrence; and
  - B. Specific problem associated with the indicator or recording equipment.
- c. Reporting of Non-compliance

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limits as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Notification within 15 days of operation of the affected loading rack and/or associated vapor recovery unit in excess of the limitations of Condition 7.7.5(c).

- d. Reporting of Malfunction or Breakdown

The Permittee shall promptly notify the Illinois EPA, Maywood Regional Office on the same or next working day of any malfunction or breakdown of any VCU or vapor recovery unit, documenting the time of occurrence and type of malfunction or breakdown. The

Permittee shall also submit a quarterly report summarizing the quantity of emissions, the type and duration of each malfunction and the steps taken to reduce the occurrence of each malfunction or breakdown.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected loading rack 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:

- a. During such time that a malfunction or breakdown occurs on the VRU, the portable flare unit may be used.

The portable flare unit shall be operated according to the procedures referenced in 40 CFR 60.18(b) through (f).

7.7.12 Compliance Procedures

- a. Compliance with the operational limitations of Condition 7.7.5(c), and the operating requirements of Condition 7.7.7 shall be demonstrated through the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.7.8, 7.7.9, and 7.7.10.
- b. Compliance with the control requirements of 7.7.5(a) and (b) shall be demonstrated by the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.7.8, 7.7.9, and 7.7.10 and the fact that compliance of the affected loading rack and associated vapor combustion unit have previously been demonstrated by fulfillment of the test requirements of 40 CFR 60.8 by measurement of the total organic concentration(s) in the effluent stream of the vapor combustion system.
- c. Monthly VOM emissions from the loading rack shall be determined by use of the following equation:

i. Loading Emissions

$$\text{Loading Emissions (lb/month)} = CE \times \sum_{i=1} LL_i \times V_i$$

Where:

$LL_I$  = Calculated loading loss emissions factors (lb/1000 gallon) for gasoline, distillates, denatured ethanol, interface/transmix...etc.

$V_I$  = Throughput of gasoline, distillates, denatured ethanol, interface/transmix...etc. (gallon/year)

CE = Control Efficiency of the most current stack test.

$LL_i$  is the uncontrolled loading loss emissions factors for gasoline, distillates, and denatured ethanol, based on the AP-42 equation for loading of tank trucks (Section 5.2).

$LL_g$  = 6.187 lb/1000 gallons of gasoline loaded

$LL_e$  = 0.563 lb/1000 gallons of denatured ethanol loaded (based on the calculation method shown below)

$LL_{F1}$  = 0.019 lb/1000 gallons of Fuel Oil No. 1 loaded (based on the calculation method shown below)

$LL_{F2}$  = 0.014 lb/1000 gal of Fuel Oil No. 2 (based on the calculation method shown below)

All other loading factors shall be determined, based on the AP-42 equation for loading of tank trucks, as follows:

$$LL_i = 12.46 \times [S_i \times P_i \times M_i/T_i]$$

Where:

$LL_i$  = Loading losses, in lbs/1000 gal

$S_i$  = Saturation factor (unitless)

$P_i$  = True vapor pressure, in psia

$M_i$  = Molecular weight of vapors, in lb/lb-mole

$T_i$  = Temperature of bulk liquid loaded, in  
degrees Rankine

- ii. Fugitive Truck emissions shall be calculated based upon the following:

Fugitive Truck Emissions = (Gasoline + Ethanol  
Throughput (gallons/month)) x 0.0751 lb/1000  
gal

- iii. Total Emissions = Loading Emissions + Fugitive  
Truck Emissions

- d. HAP emissions from the loading rack shall be determined by speciating the individual HAP emissions as a percentage of the gasoline and denatured ethanol throughputs (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (c) above. Total HAP emissions will be based on the sum of the emissions for each individual HAP.

7.8 Unit: Fugitives from Leaking Components  
Control: None

7.8.1 Description

Fugitive emissions from equipment components, those not included in the loading rack emissions, such as valves, flanges,...etc., are generated during the processing of material through the piping distributed throughout the source.

7.8.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Equipment Components (Valves, Flanges, Pump Seals, Etc.)	Processing of Material Throughout the Source's Piping System	Work Practices and Equipment Replacement

7.8.3 Applicability Provisions

There are no general rules or regulations that address the operation of these emission units located at a petroleum bulk terminal. However, 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°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions. Note that pursuant to Condition 5.10, the source is shielded from determining compliance with 35 IAC 218.142.

7.8.4 Non-Applicable Regulations

This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart TT, because the potential to emit VOM from subject units does not exceed 25 tpy.

7.8.5 Control Requirements

None

7.8.6 Emission Limitations

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

7.8.7 Operating Requirements

The Permittee shall repair any component from which a leak of VOL or VPL is detected or observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found. If the leaking component cannot be repaired until the process unit is shut down, the leaking component must then be repaired before the unit is restarted.

7.8.8 Inspection Requirements

The Permittee shall visually inspect for leaks from all affected equipment components on a monthly basis.

7.8.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the piping components at the source to demonstrate compliance with Condition 7.8.4 pursuant to Section 39.5(7)(b) of the Act.

- a. The number of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or vapor service, as applicable
- b. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.), tons/year, with supporting calculations, calculated utilizing the compliance procedures in Condition 7.8.12 or other approved USEPA methodology;

7.8.10 Reporting Requirements

None

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to these units 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

7.8.12 Compliance Procedures

Compliance with the fugitive VOM emission limitations of Condition 7.4 and pursuant to the overall VOM emissions limitation of Condition 5.5 shall be demonstrated through the calculation of the following equation:

$$\text{Total Fugitive VOM Emissions (lb/hr)} = \sum_{i=1} EF_i \times N_i$$

Where:

EF<sub>i</sub> = The specific component's (i.e., valves, pump seals, etc.) emission factor listed below.

Component	EF lb/component-hour
Connectors and Flanges	2.30 x 10 <sup>-5</sup>
Valves	1.50 x 10 <sup>-4</sup>
Loading Arms	8.70 x 10 <sup>-4</sup>
Pumps	9.30 x 10 <sup>-3</sup>
Other <sup>a</sup>	2.50 x 10 <sup>-4</sup>

Emission factors found in API Publication No. 4588, "Development of Fugitive Emission Factors and Emission Profiles for Petroleum Marketing Terminals, Vol. 1, 1993",

a Other means any components other than flanges, valves, open-ended lines, and pump seals

N<sub>i</sub> = Number of specific components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service as recorded in the records required in Condition 7.8.9.

Total annual emissions, in tons/year, shall be calculated by multiplying the hourly emission by 8760 hr/year.

a. Fugitive HAP emissions from equipment components, other than those included in the loading rack emissions, shall be determined by speciating the individual HAP emissions as a percentage of the gasoline and denatured ethanol throughputs (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (c) above. Total fugitive HAP emissions will be

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based on the sum of the emissions for each individual  
HAP.

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].

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 without applying for or obtaining an

amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and 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 [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. 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;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. 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

A report summarizing required monitoring 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]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
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 (MC 40)  
Bureau of Air  
Compliance Section  
P.O. Box 19276  
Springfield, Illinois 62794-9276

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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)(p)(ii) of the Act]:

- 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; 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.

#### 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 compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- 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)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Summary of Storage Tank Features and Groupings

TABLE 1-1

<u>Group/Tank #</u>	<u>Capacity (Barrels)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia At 70°F)</u>	<u>Date Constructed</u>
Group 1							
T-1	455	Fixed Roof	-	-	Transmix	3.0	Before 1970
T-2	455	Fixed Roof	-	-	Transmix	3.0	Before 1970
T-3	455	Fixed Roof	-	-	Transmix	3.0	Before 1970
T-4	455	Fixed Roof	-	-	Transmix	3.0	Before 1970
AA-8-1	191	Fixed Roof	-	-	Gasoline	6.8	1980
AA-8-2	191	Fixed Roof	-	-	Gasoline	6.8	Before 1973
AA-1-3	24	Fixed Roof	-	-	Gasoline	6.8	Before 1973
AA-2-4	48	Fixed Roof	-	-	Gasoline	6.8	Before 1973
Group 2							
27-13	27,000	Fixed Roof	-	-	Distillate Fuels	0.009	1955
13-14	13,000	Fixed Roof	-	-	Distillate Fuels	0.009	1956
55-15	55,000	Fixed Roof	-	-	Distillate Fuels	0.009	1956
Group 3							
13-7	13,000	Internal Floating Roof	Mini- Mechanical Shoe	-	Ethanol	0.87	1956*

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<u>Group/Tank #</u>	<u>Capacity (Barrels)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia At 70°F)</u>	<u>Date Constructed</u>
Group 4							
27-5	27,000	Internal Floating Roof	Liquid Mounted Flexible Wiper	-	Various Petroleum Products	6.8	1956
27-6	27,000	Internal Floating Roof	Vapor Mounted Flexible Wiper	-	Various Petroleum Products	6.8	1956
27-12	27,000	Internal Floating Roof	Vapor Mounted Flexible Wiper	-	Various Petroleum Products	6.8	1956
55-8	55,000	Internal Floating Roof	Vapor Mounted Flexible Wiper	-	Various Petroleum Products	6.8	1955
13-10	13,000	Internal Floating Roof	Vapor Mounted Flexible Wiper	-	Various Petroleum Products	6.8	1956

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<u>Group/Tank #</u>	<u>Capacity (Barrels)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Group 5							
67-9	67,000	External Floating Roof	Metallic -Type Shoe	Shoe- Mounted	Various Petroleum Products	6.8	1958
67-11	67,000	External Floating Roof	Metallic -Type Shoe	Shoe- Mounted	Various Petroleum Products	6.8	1958
Group 6							
80-17	80,000	Internal Floating Roof	Liquid Mounted Flexible Wiper	-	Various Petroleum Products	6.8	1977

\* Modified in 1994 - Converted to internal floating roof

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: \_\_\_\_\_

MED:jar

I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Marathon Ashland Petroleum, LLC - Willow Springs Terminal is located at 7600 LaGrange Road. The source is a petroleum bulk terminal for various petroleum products. Materials are transferred to the terminal by pipe line where they may be temporarily stored at the source prior to shipment of the material to different destinations via the pipeline, or distributed to petroleum bulk plants or gasoline dispensing operations located within the surrounding community by way of truck. A truck loading rack is used for this purpose.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Emission Control Equipment
Group 1 Storage Tanks (See Attachment 1 for Details)	Fixed Roof Storage Tanks with a Capacity of 40,000 Gallons or Less Storing Various Petroleum Liquids	Permanent Submerged Fill
Group 2 Storage Tanks (See Attachment 1 for Details)	Fixed Roof Storage Tanks with a Capacity Greater Than 40,000 Gallons That Store Organic Material with a Vapor Pressure Less Than 0.5 Psia	Permanent Submerged Fill
Group 3 Storage Tanks (See Attachment 1 for Details)	Internal Floating Roof Storage Tanks - (Ethanol Storage)	Floating Roof with Primary Seal and Permanent Submerged Fill
Group 4 Storage Tanks (See Attachment 1 for Details)	Existing Internal Floating Roof Storage Tanks - Not Subject to 40 CFR 60 Subpart K or Kb (Petroleum Products Storage)	Floating Roof with Primary Seal and Permanent Submerged Fill
Group 5 Storage Tanks (See Attachment 1 for Details)	External Floating Roof Storage Tanks That Require a Rim-Mounted Secondary Seal	Floating Roof and Permanent Submerged Fill
Group 6 Storage Tanks (See Attachment 1 for Details)	Internal Floating Roof Storage Tanks - Subject to 40 CFR 60 Subpart K	Floating Roof with Shoe Mounted Primary Seal and Permanent Submerged Fill
Tank Truck Loading Rack	Four Bay Petroleum Product Truck Loading Rack	Carbon Adsorption Unit with Backup Portable Combustion Unit

Emission Unit	Description	Emission Control Equipment
Fugitive Emissions	Piping, Valves, and Pumps Used to Transfer Materials Between the Pipe Line Storage Tanks and Loading/Unloading Rack	None

### III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions.

For purposes of fees, the source is allowed the following emissions:

Pollutant	Tons/Year
Volatile Organic Material (VOM)	79.4
Sulfur Dioxide (SO <sub>2</sub> )	---
Particulate Matter (PM)	---
Nitrogen Oxides (NO <sub>x</sub> )	---
HAP, not included in VOM or PM	---
TOTAL	79.4

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

1.1. CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

1.2. Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the 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.

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

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