FINAL DRAFT/PROPOSED CAAPP PERMIT
Orica Nitrogen LLC
I.D. No.: 063813AAE
Permit Number: 96030162
September 3, 2002

217/782-2113

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

PERMITTEE

Orica Nitrogen LLC
Attn: Tony Massa
7700 West DuPont Road
Morris, Illinois 60450

Application No.: 96030162 I.D. No.: 063813AAE
Applicant's Designation: Date Received: March 8, 1996
Operation of: Nitric Acid Chemical Plant
Date Issued: TBD Expiration Date[2]: TBD
Source Location: 7700 West DuPont Road, Morris, Grundy County
Responsible Official: Ben Van Veckhoven

This permit is hereby granted to the above-designated Permittee to OPERATE a chemical manufacturing facility, 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 Robert Bernoteit at 217/782-2113.

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

DES:RWB:psj

cc: Illinois EPA, FOS, Region 1
USEPA

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

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

Orica Nitrogen LLC
7700 West DuPont Road
Morris, Illinois 60450
815/653-2411

I.D. No.: 063813AAE
Standard Industrial Classification: 2873, Nitric Acid Chemical Products

1.2 Owner/Parent Company

Orica Nitrogen LLC
33101 East Quincy Avenue
Watkins, Colorado 80137

1.3 Operator

Orica Nitrogen LLC
7700 West DuPont Road
Morris, Illinois 60450

Tony Massa, Environmental Engineer
815/357-8711 x305

1.4 General Source Description

The Orica Nitrogen LLC facility is located at 7700 West DuPont Road in Grundy County, Illinois. This source manufactures nitric acid and ammonium nitrate prills. These chemical products are key ingredients in the production of commercial explosives. The facility also operates combustion units for the production of steam and heat.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AOP	Ammonia Oxidation Process
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
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
Btu	British thermal unit
°C	Degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
cfm	Cubic feet per meter
CFR	Code of Federal Regulations
cm	Centimeter
dscf	Dry standard cubic feet
dscm	Dry standard cubic meter
EPA	Environmental Protection Agency
ERMS	Emissions Reductions Market System
°F	Degrees Fahrenheit
ft	Feet
ft^3	Cubic feet
gal	Gallon
g	Grams
HAP	Hazardous Air Pollutant
HP	Horsepower
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
in	Inch
kg	Kilogram
kPa	Kilopascals
kW	Kilowatts
LEL	Lower Explosive Limit
lb	Pound
m	Meter
Mft^3	Mega cubic feet
Mg	Megagram

min	Minute
mmBtu	Million British thermal units
$mmft^3$	Millimeter cubic feet
mmHg	Millimeter mercury
mo	Month
mph	Miles per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NH_3	Ammonia
NO_X	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM-10	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	Parts per million
PSD	Prevention of Significant Deterioration
psi	Pounds per square inch
RMP	Risk Management Plan
sec	Seconds
scf	Standard cubic feet
SO_2	Sulfur Dioxide
T	Tons
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
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:

Diesel Fuel Storage Tank (2000 gallon)

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:

Anhydrous Ammonia Storage Tanks (61, 62, 63)

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:

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

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

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

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

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

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable. Compliance with applicable requirements shall be addressed by the routine operating information and records that are otherwise maintained by the source, which the Permittee shall make available for inspection by the Illinois EPA upon request.

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. Units in compliance with 35 IAC 218.302 or 218.303 are exempt from the provisions of 35 IAC 218.301.

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 Units	Description	Date Constructed	Control Equipment
Boilers	Produces Steam for Nitric Acid and Prill Processes	Prior 1972 Prior 1972	None
No. 3 AOP Nitric Acid Plant	Produces Nitric Acid by Oxidizing an Ammonia Air Mixture	Prior 1972	Abaters Filters
Nitric Acid Storage Tanks	Stores Nitric Acid Produced	Prior 1972	None
Ammonium Nitrate Prill Plant	Produces Prills From Anhydrous Ammonia and Nitric Acid	Prior 1972	Scrubbers Rotoclones
Gasoline Storage Tank	1000 Gallon Tank Which Stores Gasoline for Vehicle Use	Prior 1972	None
Fugitives	Road Dust, Storage Piles, Equipment Leaks, Loading/Unloading, etc.	N/A	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 nitrogen oxides (NO_X) and particulate matter (PM) emissions.

5.1.2 This permit is issued based on the source not being a major source of hazardous air pollutants (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.

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 [35 IAC 214.301].

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

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

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

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

5.2.4 a. This stationary source, as defined in 40 CFR Section 68.3, is subject to 40 CFR Part 68, the Accidental Release Prevention regulations [40 CFR 68.215(a)(1)].

b. The owner or operator of a stationary source shall revise and update the Risk Management Plan (RMP) submitted, as specified in 40 CFR 68.190.

5.2.5 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.

5.2.6 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected

pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None, except as identified on a unit-specific basis in Section 7 of this permit.

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	2.8
Sulfur Dioxide (SO_2)	0.52
Particulate Matter (PM)	427.7
Nitrogen Oxides (NO_x)	479.7
HAP, not included in VOM or PM	----
TOTAL	910.72

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

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 Retention and Availability of Records

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

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VARIABLE Emissions

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

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Boilers

7.1.1 Description

Natural gas fired boilers are used to produce steam for nitric acid and ammonium nitrate prill production processes and building heat.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Boilers	Boiler No. 5	Natural Gas-Fired Boiler, Maximum Heat Input Capacity: 102 mmBtu/hr	None
	Boiler No. 6	Natural Gas-Fired Boiler, Maximum Heat Input Capacity: 78 mmBtu/hr	None

7.1.3 Applicable Provisions and Regulations

a. An “affected boiler” for the purpose of these unit specific conditions is a steam generating unit that is fired with natural gas. As of the “date issued” as shown on page 1 of this permit, the affected boilers are identified in Condition 7.1.2.

b. Each affected boiler is subject to the carbon monoxide emission requirements of 35 IAC 216.121 as specified in Condition 7.1.6(a).

c. Each affected boiler is also subject to the opacity limits identified in Condition 5.2.2(b).

7.1.4 Non-Applicability of Regulations of Concern

a. Each affected boiler is not subject to 35 IAC 217.141, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).

b. Pursuant to 35 IAC 218.303, each affected boiler, i.e., fuel combustion emission unit, is not subject to 35 IAC 218.301, Use of Organic Material.

c. There are no applicable requirements for particulate matter or sulfur dioxide for affected boilers firing natural gas.

d. This permit is issued based on the affected boilers not being subject to the NSPS, 40 CFR 60 Subpart Db, or 40 CFR 60 Subpart Dc, because they were constructed prior to June 9, 1989 and have not been constructed, modified or reconstructed after this date.

e. This permit is issued based on the affected boilers not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Operational and Production Limits and Work Practices

Each affected boiler shall only be fired by natural gas as the fuel.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the affected boilers are subject to the following:

a. The emission of carbon monoxide (CO) into the atmosphere from each affected boiler shall not exceed 200 ppm, corrected to 50 percent excess air. [35 IAC 216.121]

b. 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.

7.1.7 Testing Requirements

Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, measurement of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109, so as to demonstrate compliance with the emission limits in

Condition 7.1.3(c). The Permittee shall keep records of any such observations and promptly report the result to the Illinois EPA within 30 days.

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1, 5.5.3 and 7.1.5 pursuant to Section 39.5(7)(b) of the Act:

a. For affected boilers, total natural gas usage for affected boilers (scf/day);

b. Annual aggregate NO_x, PM, SO_2, and VOM emissions from each affected boiler, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Any such notification shall include a description of the incident, the probable cause, and the corrective action or preventative measure taken:

Notification within 60 days of operation of an affected boiler that may not have been compliant with the opacity limitations in Condition 5.2.2(b), with a copy of such record for each incident.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

a. Compliance provisions addressing Condition 7.1.6(a) are not set by this permit as compliance is assumed to be achieved by the work-practices inherent in operation of the affected boilers.

b. For purpose of determining compliance with Condition 5.5.1, emission from affected boilers shall be determined from the fuel usage record required by Condition 7.1.9 and the emission factors and formulas below:

Emissions from burning natural gas shall be determined with the following emission factors:

Pollutant	Emission Factor For Boiler #5 ($lb/10^6$ scf)	Emission Factor For Boiler #6 ($lb/10^6$ scf)
NO_x	280	100
SO_2	0.6	0.6
PM	7.6	7.6
VOM	5.5	5.5

These emission factors are based on AP-42 Section 1.4 emission data for natural gas fired combustion units.

Boiler Emissions (lb) = natural gas consumed (scf) multiplied by the appropriate emission factor.

7.2 Unit: No. 3 AOP Nitric Acid Plant
Control: Abaters and Filters

7.2.1 Description

This process emission unit uses the Ammonia (NH_3) Oxidation Process (AOP) to manufacture Nitric Acid. Liquid NH_3 is vaporized, brought to superheated temperature and reacted with preheated air at a converter containing a platinum-palladium-rhodium catalyst. The catalyst is lit to be effective, and the exothermic reaction forms various oxides of nitrogen and excess heat. Filters purify the NH_3 and air used and recovers any carryover catalyst. The heat is used to preheat other processes and/or the boiler(s) to generate steam. Nitric oxide (NO) is separated and recycled to form nitrogen dioxide (NO_2). The cooled gas stream then passes thru the absorption tower where it reacts with water to form 58 percent nitric acid. A portion of this acid is removed and strengthened to make 65 percent nitric acid. Excess gas from the absorption tower is withdrawn through a mist separator as tail gas and residual NO_2. The residual NO_2 from the various unit processes passes through a first abater converting it back to NO, then through a second abater to convert it back to mainly nitrogen and water. The amount of nitrogen oxides exiting the stack is monitored by a continuous emissions monitor (CEM).

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Nitric Acid Plant	Equipment for Manufacture of Nitric Acid by Ammonia Oxidation	NH_3, Air and Other Filters, Pollution Abaters (2) with Catalysts

7.2.3 Applicability Provisions and Applicable Regulations

a. The “affected nitric acid plant” for purposes of these unit-specific conditions, is the emission unit described in Condition 7.2.1 and identified in 7.2.2.

b. The affected nitric acid plant is subject to 35 IAC 217.381 which requires:

i. No person shall cause or allow the emission of nitrogen oxides into the atmosphere from any existing weak nitric acid manufacturing

process to exceed 5.5 pounds per ton of acid produced (100 percent acid basis) nor allow the visible emissions in excess of 5 percent opacity [35IAC 217.381(b)]; and

ii. No person shall cause or allow the emission of nitrogen oxides into the atmosphere from any concentrated nitric acid manufacturing process to exceed 3.0 pounds per ton of acid produced (100 percent acid basis), or to exceed 225 ppm in any effluent gas stream emitted to the atmosphere, or to allow the visible emissions in excess of 5 percent opacity [35IAC 217.381(c)].

c. The affected nitric acid plant is subject to 40 CFR 60, Subpart G, which requires the installation, performance and certification of a continuous emissions monitoring (CEM) system:

i. The source owner or operator shall install, calibrate, maintain, and operate a (CEM) for measuring nitrogen oxides (NO_X). [40 CFR 60.73]

ii. Owners and operators of a CEMS installed must automatically check the zero (or low level value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. [40 CFR 60.13(d)]

iii. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation and shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.13(e)]

iv. Owners and operators of a CEMS installed shall reduce all data to 1-hour averages computed from four or more data points equally spaced over each 1-hour period. Data recorded during periods of continuous system breakdown, repair, calibration checks, and zero and span adjustments shall not be included in the data averages computed. [40 CFR 60.13(h)]

v. CEMS certification testing shall be conducted in accordance with 40 CFR 60, Appendix B, Performance Specification 2.

7.2.4 Non-Applicability of Regulations of Concern

N/A

7.2.5 Operational and Production Limits and Work Practices

a. Emissions Reduction Program

i. The Permittee shall develop and implement a protocol for minimizing startup visible emissions based upon meteorological conditions.

ii. The Permittee shall document any changes made to procedures and equipment that will be used to minimize emissions. Items to be recorded shall include any changes to procedures not previously documented, and any new maintenance procedures and equipment upgrades which will minimize emissions, as they are made.

iii. All documented emissions minimization procedures, as listed in Condition 7.2.5(a)(i) and (ii), shall be incorporated into a revised "No. 3 AOP Start-up Emissions Reduction Program" originally submitted to the Illinois EPA on September 29, 1988. (See Condition 7.2.10(c).)

b. Operation in excess of the applicable emission standards during start-up for up to two and half (22) hours is allowed for the affected nitric acid plant. This provision is allowed only if the Permittee follows the "No. 3 AOP Start-up Emissions Reduction Program", and takes reasonable steps to further reduce the frequency, duration, and quantity of excess emissions of nitrogen oxides during these periods.

c. Operation in excess of applicable emissions standards is allowed for up to a one hour period during purging only following the shutdown of the affected nitric acid plant.

d. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible

during normal working hours upon the occurrence of excess emissions due to malfunctions, or breakdowns. The Permittee shall comply with all reasonable and safe directives of the regional office regarding such malfunctions and breakdowns. Within five (5) working days of such occurrence the Permittee shall give a written follow-up notice to the Illinois EPA's regional office providing an explanation of the occurrence, the length of time during which operation continued under such conditions, measures taken by the Permittee to minimize excess emissions and correct deficiencies, and when normal operation resumed.

These above operation and work practices were established in Permit 72111200, pursuant to 40 CFR Part 60, Subpart G. 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 New Source Performance Standards (NSPS), 40 CFR 60 Subpart G.

7.2.6 Emission Limitations

In addition to Condition 5.2.2, the source wide emission limitations in Condition 5.5, and the affected unit emission limitations in Condition 7.2.3, the affected nitric acid plant is subject to the following emission limitations:

None

7.2.7 Testing Requirements

Upon reasonable request by the Illinois EPA, pursuant to section 39.5(7)(d) of the Act, the Permittee shall test for NO_X emissions or efficiency.

7.2.8 Monitoring Requirements

For the affected nitric acid plant during periods of CEM equipment malfunction, the Permittee shall:

a. Record the duration of all CEM equipment malfunctions and record the hours the affected unit is operated without the monitoring device.

b. Provide written notice to the Agency within 10 days following the conclusion of any 72 hour period during which the affected nitric acid plant is operated and the associated CEM equipment is not operational. This notice must provide the duration of the malfunction, a description of the repairs made to the equipment, and the total to date of all hours in the calendar year during which the affected unit was operated and the associated CEM equipment was not operational.

7.2.9 Recordkeeping Requirements

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

i. Daily production rate (tons/day and tons/yr) and hours of operation;

ii. A copy of the most recent "No. 3 AOP Start-up Emissions Reduction Program", including those revisions made pursuant to Condition 7.2.5(a);

iii. NO_x emissions as determined by the Continuous Emission Monitor (CEM) with documentation of calculations, as applicable; and

iv. A record of observed excess visible emissions.

b. The Permittee shall maintain records of excess emissions during start-ups, shutdowns, malfunctions (including CEM equipment malfunctions), and breakdowns. As a minimum, records shall include:

i. The time at which the start-up of the affected nitric acid plant was initiated and the time the start-up was aborted;

ii. The NO_x readings obtained by the CEM monitor and the calculated NO_x emissions during start-up;

iii. Date and duration of excess emissions;

iv. A full and detailed explanation of the cause for such emissions;

v. The contaminants emitted and an estimate of the quantity of emissions;

vi. The measures used to reduce the quantity of emissions and duration of the occurrence; and

vii. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.

c. These records shall be retained for at least five years following an event, maintained at a readily accessible location at the plant, and shall be available for inspection and copying by the Illinois EPA upon request.

These above recordkeeping requirements were established in Permit 72111200, pursuant to 40 CFR Part 60, and 35 IAC 217.381. 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 New Source Performance Standards (NSPS), 40 CFR 60.

7.2.10 Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected emission unit 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:

Emissions of NO_X from the affected nitric acid plant in excess of the limits specified in Condition 7.2.3 or 7.2.6 within 30 days of such an occurrence.

b. The Permittee shall provide the following excess emissions and monitoring systems performance report to the Illinois EPA, Compliance Section and Regional Field Office, on a quarterly basis pursuant to 35 IAC 201.263. Written reports of excess emissions shall include the following information:

i. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), and conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period;

ii. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility, the nature and cause of any malfunction (if known), and the corrective action taken or preventative measures adopted;

iii. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments; and

iv. When no excess emissions have occurred or the CEM has not been inoperative, repaired, or adjusted, such information shall be stated in the report. If there have been no exceedances during the prior calendar year the Annual Emissions Report shall include a statement to that effect.

c. An annual report of any updated procedures and system improvements used to minimize unscheduled shutdowns and emissions, including any revisions to the “No. 3 AOP Start-up Emissions Reduction Program”, as required by Condition 7.2.5(a)(iii).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.2.12 Compliance Procedures

Compliance with all emission limits of the affected nitric acid plant shall be based on the recordkeeping and reporting requirements in Conditions 7.2.9 and 7.2.10.

7.3 Unit: Nitric Acid Storage Tanks

7.3.1 Description

The Permittee stores nitric acid produced from its manufacturing operations in 14 storage tanks at the facility. These tanks were constructed prior to 1972, have fixed roofs, and are vented to the atmosphere.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Storage[1] Tanks	Stores Nitric Acid Produced	Prior to 1972	None

[1] See Attachment 1 for summary of storage tank features.

7.3.3 Applicability Provisions and Applicable Regulations

a. The affected nitric acid storage tanks for purposes of these unit-specific conditions are identified in Condition 7.3.2 and described in Condition 7.3.1.

b. The affected nitric acid storage tanks are subject to 35 IAC 217.381.

7.3.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected nitric acid storage tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks do not use an add-on control device to achieve compliance with an emission limitation or standard.

b. This permit is issued based on the affected nitric acid storage tanks not being subject to 35 IAC 215 Subpart B, because the affected tanks are not being used to store an organic material.

7.3.5 Operational and Production Limits and Work Practices

a. Permittee shall maintain and operate the affected nitric acid storage tanks in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used

will be based on, but not limited to, monitoring results, review of operating and maintenance procedures, and inspection of the source.

b. This permit is issued based on the affected nitric acid storage tanks not being used to store any organic materials.

7.3.6 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 limitations:

No person shall cause or allow the emission of nitrogen oxides into the atmosphere from any existing weak nitric acid manufacturing process to exceed 0.2 lbs/Ton of nitric acid produced from any acid storage tank vents. [35 IAC 217.381(b)]

Note: Section 8.8.2 of AP-42 (dated Feb 1998) defines weak acid as “any concentration ranging from 30 to 70 percent nitric acid.”

7.3.7 Testing Requirements

N/A

7.3.8 Monitoring Requirements

N/A

7.3.9 Recordkeeping Requirements

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

a. The amount of nitric acid produced and stored, per storage tank, on a monthly and annual basis (tons); and

b. Monthly and aggregate annual NO_X emissions from the affected nitric acid storage tanks (tons).

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected nitric acid storage tanks with the permit requirements 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.3.12 Compliance Procedures

To determine compliance with Conditions 5.5.1 and 7.3.6, NO_X emissions from the affected nitric acid storage tanks shall be calculated based on the recordkeeping requirements in Condition 7.3.9 and the following:

NO_X emission (Tons) = (production, Tons) x (emission factor, 0.2 lb NO_X/Ton Acid stored) x 1 Ton/2000 lb

7.4 Unit: Ammonium Nitrate Prill Plant
Control: Scrubbers and Rotoclones

7.4.1 Description

Ammonium nitrate prills are produced by reacting anhydrous ammonia and weak nitric acid to produce an ammonium nitrate solution of approximately 83 percent. The solution is sent trough an evaporator to remove excess water and to increase the concentration to about 97 percent. The concentrated melt is sprayed through holes into the top of a prilling chamber where it falls countercurrent to a rising air stream that solidifies and cools the ammonium nitrate droplets before they hit the bottom of the tower as low density spherical prills. The prills are placed in a pre-dryer and then a dryer and allowed to cool to lower the moisture content to less than 0.3 percent and the temperature to room level. Finally the prills are coated with Galdryl to prevent the hygroscopic material from picking up moisture during storage and shipment.

The primary emissions from the ammonium nitrate prill production are particulate matter of ammonium nitrate. These emissions are controlled by two scrubbers and three rotoclones in the production process.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment Description	Emission Control Equipment
Ammonium Nitrate Prill Plant	Ammonia Vaporizer – vaporizes the ammonia	None
	Neutralizer, Condenser, and Solution Tank – where anhydrous ammonia and weak nitric acid are combined	Scrubber #1 Scrubber #2
	Evaporator - concentrates ammonium nitrate solution	None
	Head Tank and Prilling Tower – forms ammonium nitrate prills from solution	None
	Pre-Dryer – reduces moisture content of prills	Rotoclone
	Dryer – further reduces moisture content of prills	Rotoclone
	Cooler – reduces temperature of prills	Rotoclone

Emission Unit	Equipment Description	Emission Control Equipment
Ammonium Nitrate Prill Plant (cont)	Rework Tanks (4) – prepare material to re-insert into the solution process	None
	Product Elevator, Coating Agent Hopper, & Coater – coats and stores the prills to prevent agglomeration	None

7.4.3 Applicability Provisions and Applicable Regulations

a. An “affected ammonium nitrate prill plant" for the purpose of these unit-specific condition is a manufacturing production plant as listed in Condition 7.4.2 and as described in Condition 7.4.1.

b. The affected ammonium nitrate prill plant is subject to the particulate matter emission requirements of 35 IAC 212.322 as specified in Condition 7.4.6(a).

c. The affected ammonium nitrate prill plant is not subject to 35 IAC 217 Subpart O, because the affected prill plant does not produce nitric acid.

7.4.4 Non-Applicability of Regulations of Concern

N/A

7.4.5 Operational and Production Limits and Work Practices

The Permittee shall maintain and operate the emissions source, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on, but not limited to, monitoring results, review of operating and maintenance procedures, and inspection of the source.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected ammonium nitrate prill plant is subject to the following:

Process Emission Units Which Were Existing Prior to April 14, 1972 [35 IAC 212.322]. No person shall

cause or allow the emission of particulate matter (PM) into the atmosphere in any one hour period from any existing process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in the following equation:

$$E = C + A(P)^B$$

Where:

P = Process weight rate;
E = Allowable emission rate; and,

i. For process weight rate up to 30 ton/hr:

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

ii. For process weight rate over 30 ton/hr:

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

iii. For a process weight rate under 100 lb/hr (0.05 ton), the allowable emission rate is 0.55 lb/hr.

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).

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

a. Amount of ammonium nitrate prills produced on a monthly (lbs/hr) and an annual (ton/yr) basis;

b. Hours of operation of the affected ammonium nitrate prill plant; and

c. The monthly and annual PM emissions from the affected ammonium nitrate prill plant in lbs/mo and ton/yr calculated from the emission rate determined from stack testing times the hours of operation in Condition 7.4.9(b).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected ammonium nitrate prill plant with the permit requirements 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.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

Compliance for this affected unit with the emission limits as calculated from Condition 7.4.6 shall be based on the comparison with the records kept as required by Condition 7.4.9(c). Emissions from 7.4.9(C) calculated from the following equation must be less than or equal to those calculated from Condition 7.4.6:

NH_4NO_3 prill production (tons) * Appropriate PM Emission Factor from stack testing (lb/ton/hr) * Hours of Operation (hr/mo).

7.5 Unit: Gasoline Storage Tank

7.5.1 Description

The Permittee operates a fixed roof storage tank that stores gasoline. Permanent submerged loading must be used for this tank, minimizing turbulence and evaporation of VOM during loading.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment Description	Emission Control Equipment
Gasoline Storage Tank	1000 Gallon Gasoline Storage Tank with Submerged Loading Pipe	None

7.5.3 Applicability Provisions and Applicable Regulations

a. The gasoline tank identified in Condition 7.5.2 is an "affected tank" for the purpose of these unit-specific conditions.

b. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2) [35 IAC 215.122(b)].

c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall only apply to photochemically reactive material [35 IAC 215.301].

d. Pursuant to 35 IAC 215.583(a), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless:

i. The tank is equipped with a submerged loading pipe [35 IAC 215.583(a)(1)]; and

ii. Pursuant to 35 IAC 215.583(a)(2), the vapors displaced from the storage tank during filling are processed by a vapor control system that includes one or more of the following:

A. A vapor collection system that meets the requirements of Condition 7.x.5(c) (see also 35 IAC 215.583(d)(4)) [35 IAC 215.583(a)(2)(A)]; or

B. A refrigeration-condensation system or any other system approved by the Illinois EPA that recovers at least 90 percent by weight of all vaporized organic material from the equipment being controlled [35 IAC 215.583(a)(2)(B)]; and

C. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 215.584(b) or (d) [35 IAC 215.583(a)(2)(C)].

7.5.4 Non-Applicability of Regulations of Concern

a. The affected tank is not subject to the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60 Subpart Kb, because the affected tank was constructed prior to 1984.

b. The affected tank is not subject to the requirements of 35 IAC 215.123, Petroleum Liquid Storage Tanks, pursuant to 35 IAC 215.123(a)(2), which exempts storage tanks with a capacity less than 151.42 m^3.

c. This permit is issued based on the affected gasoline tank not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tank does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.5.5 Operational and Production Limits and Work Practices

a. The affected tank shall only be used for the storage of gasoline.

b. Pursuant to 35 IAC 215.583(c), each owner of a gasoline dispensing operation shall:

i. Install all control systems and make all process modifications required by Condition 7.5.3(d) (see also 35 IAC 215.583(a)) [35 IAC 215.583(c)(1)];

ii. Provide instructions to the operator of the gasoline dispensing operation describing necessary maintenance operations and procedures for prompt notification of the owner in case of any malfunction of a vapor control system [35 IAC 215.583(c)(2)]; and

iii. Repair, replace or modify any worn out or malfunctioning component or element of design [35 IAC 215.583(c)(3)].

c. Pursuant to 35 IAC 215.583(d), each operator of a gasoline dispensing operation shall:

i. Maintain and operate each vapor control system in accordance with the owner's instructions [35 IAC 215.583(d)(1)];

ii. Promptly notify the owner of any scheduled maintenance or malfunction requiring replacement or repair of a major component of a vapor control system [35 IAC 215.583(d)(2)];

iii. Maintain gauges, meters or other specified testing devices in proper working order [35 IAC 215.583(d)(3)]; and

iv. Pursuant to 35 IAC 215.583(d)(4), operate the vapor collection system and delivery vessel unloading points in a manner that prevents:

A. 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 [35 IAC 215.583(d)(4)(A)]; and

B. Avoidable leaks of liquid during the filling of storage tanks [35 IAC 215.583(d)(4)(B)].

7.5.6 Emission Limitations

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

7.5.7 Testing Requirements

Within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, repair and retest a vapor collection system which exceeds the limits of Condition 7.5.5(c)(iv)(A) (see also 35 IAC 215.583(d)(4)(A)) [35 IAC 215.583(d)(5)].

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

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

a. Records of the testing of the affected tank pursuant to Condition 7.5.7, which include the following [Section 39.5(7)(e) of the Act]:

i. The date, place and time of sampling or measurements;

ii. The date(s) analyses were performed;

iii. The company or entity that performed the analyses;

iv. The analytical techniques or methods used;

v. The results of such analyses; and

vi. The operating conditions as existing at the time of sampling or measurement.

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

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

d. The throughput of the affected tank, gal/mo and gal/yr; and

e. The monthly and aggregate annual VOM emissions from the affected tank based on the material stored, the tank throughput, and the applicable emission factors and formulas with supporting calculations.

7.5.10 Reporting Requirements

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

a. Any storage of VOL in an affected tank that is not in compliance with the requirements of Conditions 7.5.3(b) and (d)(i) (see also 35 IAC 215.122(b) and 215.583(a)(1)), 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 requirements of Conditions 7.5.3(b) and (d)(i) (see also 35 IAC 215.122(b) and 215.583(a)(1)) 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;

c. The storage of any VOL or VPL other than the material specified in Condition 7.5.5(a) 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.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from the affected tank to determine compliance with Conditions 5.5.1 and 7.5.3(c), Versions 3.1 or 4.0 of the TANKS program are acceptable.

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 _____ (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 that contravene express permit terms

so long as the changes do not violate applicable requirements or contravene federally enforceable permit terms or conditions that are monitoring (including tests methods), recordkeeping, reporting, or compliance certification requirements 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

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

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

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

8.6.2 Test Notifications

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

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

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

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

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

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

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

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

8.6.3 Test Reports

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

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9911 West Harrison
Des Plaines, Illinois 60016

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 (AE - 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 there under.

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

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

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

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

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

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

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or

resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for

continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit 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)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Nitric Acid Storage Tank Features

TABLE 1-1

Tank ID#	Product Stored	Storage Capacity (Gallons)	Fixed Roof	Vapor Pressure at 70°F (psia)	Density of Product Stored (lb/gal)	Annual Throughput (Gallons)
C-9384	65% Acid	143,000	YES	0.14	11.67	8,855,000
35	65% Acid	7,500	YES	0.74	12.94	511,000
36	65% Acid	7,500	YES	0.74	12.94	511,000
37	65% Acid	8,200	YES	0.74	12.94	511,000
38	65% Acid	8,200	YES	0.74	12.94	511,000
8-0042	58% Acid	237,000	YES	0.14	11.38	56,500,000
40	58% Acid	9,400	YES	0.16	11.09	2,100,000
41	58% Acid	9,400	YES	0.14	11.33	2,100,000
42	58% Acid	7,500	YES	0.14	11.38	2,100,000
42A	58% Acid	7,500	YES	0.14	11.38	2,100,000
43	58% Acid	9,400	YES	0.14	11.67	2,100,000
46	58% Acid	9,400	YES	0.14	11.78	2,100,000
47	58% Acid	8,200	YES	0.14	11.78	2,100,000
48	58% Acid	8,200	YES	0.14	11.79	2,100,000

10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;

- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

- Requires more frequent monitoring or reporting by the Permittee;

- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the Illinois EPA;

- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or

- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule,

marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source’s suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of

minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;

- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

10.3 Attachment 3 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: _____

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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information

1. Source name:		
2. Source street address:		
3. City:		4. Zip code:
5. Is the source located within city limits?		☐ Yes ☐ No
6. Township name:	7. County:	8. ID number:

Owner Information

9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)

14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information

19. Who is the applicant? ☐ Owner ☐ Operator	20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	☐ Yes ☐ No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application

Note 1: Answering “No” to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.

Authorized Signature:

BY:

_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source’s CAAPP permit, if necessary.

Project Summary

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 Orica Nitrogen LLC facility is located at 7700 West DuPont Road in Grundy County, Illinois. This source manufactures nitric acid and ammonium nitrate prills. These chemical products are key ingredients in the production of commercial explosives. The facility also operates combustion units for the production of steam and heat.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Units	Description	Date Constructed	Control Equipment
Boilers	Produces Steam for Nitric Acid and Prill Processes	Prior 1972 Prior 1972	None
No. 3 AOP Nitric Acid Plant	Produces Nitric Acid by Oxidizing an Ammonia Air Mixture	Prior 1972	Abaters Filters
Nitric Acid Storage Tanks	Stores Nitric Acid Produced	Prior 1972	None
Ammonium Nitrate Prill Plant	Produces Prills From Anhydrous Ammonia and Nitric Acid	Prior 1972	Scrubbers Rotoclones
Gasoline Storage Tank	1000 Gallon Tank Which Stores Gasoline for Vehicle Use	Prior 1972	None
Fugitives	Road Dust, Storage Piles, Equipment Leaks, Loading/Unloading, etc.	N/A	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:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	2.8
Sulfur Dioxide (SO_2)	0.52
Particulate Matter (PM)	427.7
Nitrogen Oxides (NO_x)	479.7

HAP, not included in VOM or PM	----
TOTAL	910.72

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

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.

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.

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 166.

RWB:psj