217/782-2113

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

PERMITTEE

BP – Wood River Terminal
Attn: Vernon St. Peters, Terminal Manager
335 South Old St. Louis Road
Wood River, Illinois 62095

Application No.: 95060048
I.D. No.: 119115AAY
Applicant's Designation:
Date Received: June 7, 1995
Operation of: Bulk Petroleum Terminal
Date Issued: May 24, 2002
Expiration Date[2]: May 24, 2007
Source Location: 335 South Old St. Louis Road, Wood River, Madison County
Responsible Official: Vernon St. Peters, Terminal Manager

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

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

DES:DGP:psj

cc: Illinois EPA, FOS, Region 3

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

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

BP – Wood River Terminal
335 South Old St. Louis Road
Wood River, Illinois 62095
618/254-0695

I.D. No.: 119115AAY
Standard Industrial Classification: 5171, Petroleum Terminal

1.2 Owner/Parent Company

BP Products North America, Inc.
200 East Randolph Drive
Chicago, Illinois 60601

1.3 Operator

BP – Wood River Terminal
335 South Old St. Louis Road
Wood River, Illinois 62095

Vernon St. Peters, Terminal Manager
618/254-7630

1.4 General Source Description

The BP – Wood River Terminal is located at 335 South Old St. Louis Road in Wood River. The source receives various products like gasoline, diesel oil, aviation fuel, and additives including ethanol and ships them out via trucks and pipeline. The receipt of these various products is by pipeline, barge, and truck. Distillate is also loaded into railcars for shipment. When gasoline and ethanol are loaded into trucks, the fumes are ducted to a vapor recovery unit. Gasoline, ethanol and distillate fuels are received by barge and are loaded on to barges for shipment via a neighboring facility that is owned and operated by an entity not under the control of BP and is not included in this permit.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
gal	Gallons
HAP	Hazardous Air Pollutant
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
kP2	Kilopascals
kW	kilowatts
l	liter
lb	pound
mg	milligram
mmBtu	Million British thermal units
MTBE	Methyl Tert-Butyl Ether
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
SVE	Soil Vapor Extraction
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
VOL	Volatile Organic Liquid

VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
VRU	Vapor Recovery Unit

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:

None

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:

Ethanol Truck Unloading into Tankage
Barge Unloading into Tankage
Forebay
Grit Chamber
Exit Cells
Sewer Valve #9
Water Tank
Tank 243
Hydrocarbon Recovery System (Wells)
Penstock Sump and Ancillary Valve Boxes
Sumps: J-3, J-16, J-39 and J-100
Additive Tank A-20
Additive Tank A-26
Additive Totes
Tank T-151 for Distillate Filter Pressure Relief

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:

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

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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)].

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

3.2 Compliance with Applicable Requirements

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

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

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

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

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

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

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date of Construction[a]	Emission Control Equipment
Loading Rack with Vapor Recovery	Ten bay loading rack used for loading various petroleum products, ethanol, and into tank trucks	Loading Rack: 1979 VRU: 1990	Vapor Recovery Unit
Group 1 Tanks, Subject to NSPS Subpart K			
105, 106, 201 (when in VPL Service)	Internal Floating Roof Tank		Floating roof, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
107	Internal Floating Roof Tank		Floating roof with dome, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
205, 257, 294, 296	Internal Floating Roof Tank		Floating roof with dome, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
295	Internal Floating Roof Tank		Floating roof, liquid-mounted resilient primary seal, and a permanent submerged loading pipe
Group 2 Tanks, Not Subject to NSPS			
204	Internal Floating Roof Tank		Floating roof, metallic shoe primary seal, and a permanent submerged loading pipe
268, 269	Internal Floating Roof Tank		Floating roof with dome, liquid-mounted resilient primary seal, rim-mounted secondary seal and a permanent submerged loading pipe

Emission Unit	Description	Date of Construction[a]	Emission Control Equipment
201, 280, 281, 282, 283, 284	Internal Floating Roof Tank		Floating roof, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
292	Internal Floating Roof Tank		Floating roof with dome, vapor-mounted resilient primary seal and a permanent submerged loading pipe
293	Internal Floating Roof Tank		Floating roof with dome, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
149	External Floating Roof Tank		Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
155	External Floating Roof Tank		Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
287	External Floating Roof Tank		Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
288	External Floating Roof Tank		Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
289	External Floating Roof Tank		Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe

Emission Unit	Description	Date of Construction[a]	Emission Control Equipment
Tank No. T100	16,000 Gallon Fixed Storage Tank Containing Interface		Submerged Loading Pipe
Gasoline Tank	2,500 Gallon Horizontal Storage Tank		Submerged Loading Pipe
Tank 155 Truck Loading	Recovered Oil is Pumped Directly from Tank to Truck	1994	
API Oil-Water Separator	Separates a Layer of Oil From Wastewater	Pre-1972	12 of 16 Cells Have Floating Roof
V-100 Oil-Water Separator V-100	Separates a Layers of Oil From Recovery Wells Water	1991	None
SVE	Soil Vapor Extraction Remediation System (5 Engines)	2000	Internal Combustion Engines
Rail Car Loading	Distillate Railcar Loading Operations	2000	None
Equipment components (valves, flanges, pump seals, etc.)	Processing of material throughout the source's piping system	N/A	Work practices and equipment replacement

[a] The date constructed for all tanks is listed in Attachment 1 in a table format.

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

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

5.2 Applicable Regulations

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

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

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

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

b. 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 219.585(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 the Illinois Metro-East Area comprised of Madison, Monroe and St. Clair counties gasoline, that has a Reid vapor pressure in excess of the following:

a. Gasoline shall not exceed 7.4 psi (49.68 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 blend gasolines whose Reid vapor pressure is less than 1.0 psi above the base stock gasoline immediately after blending with 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.

5.2.4 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.

5.2.5 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 Episode Action Plan

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

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

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

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

i. Illinois EPA, Compliance Section; and

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

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

5.2.7 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

a. This permit is issued based on the source not being subject to 40 CFR 63, Subparts R because the source is not a major source of HAPs. [40 CFR Section 63.420(a)] (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 61, Subpart Y because the storage tanks at the source are not in benzene service nor do they store industrial grade benzene or refined benzene as defined in 40 CFR 61.270(a). (See also Condition 5.4)

e. This permit is issued based on the source not being subject to 40 CFR 63, Subpart VV 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)

f. 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.

g. This permit is issued based on the source not being subject to the control requirements of 35 IAC Part 219, Subpart TT, because the potential to emit VOM from subject units does not exceed 100 tons/year.

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 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. This requirement provides the basis for determining compliance with 35 IAC 219.142, as noted in Section 5.10.

b. During the regulatory control period, May 1 through September 15 of each year, any operation receiving gasoline from this source shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 219.585(b) and (c) (Condition 5.2.3).

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)	226.90
Sulfur Dioxide (SO_2)	3.42
Particulate Matter (PM)	4.27
Nitrogen Oxides (NO_x)	19.96
HAP, not included in VOM or PM	--
TOTAL	254.55

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data (as described in Section 5.7.3), 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. AP-42 and methods based on AP-42 are also deemed acceptable.

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. Pursuant to Condition 5.8, the Permittee shall maintain a log or other record identifying which unit-specific condition (Condition 7.1 or 7.2 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)(l)(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^3 (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 219.129(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 on a monthly basis for the previous month:

   i. The throughputs of each organic liquid through each tank or group of tanks;

   ii. For each HAP identified as present, the total emissions of the individual HAP for all emission units at the source, tons/month, with supporting calculations; and

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

   iv. Should the terminal stop managing gasoline containing MTBE completely [as characterized in 40 CFR 63.420(a)], then the terminal will

not be required to perform or maintain monthly HAP emission data as required by this or any other condition of the permit. This is based on a screening equation evaluation for the facility that indicates the terminal as an area (minor) source for HAPs at a gasoline throughput of 950 million gallons/year if the Permittee only manages gasoline that does not contain MTBE as characterized in 40 CFR 63.420(a). The Permittee is required to report this change to Illinois EPA in within 30 days of the change in the type of gasoline managed. The Permittee is also required to comply with the recordkeeping requirements in 40 CFR 63.420(c) upon commencing the change in demonstrating area (minor) source status for HAPs.

v. Should the terminal discontinue use of MTBE in part such that less than one-half of the floating roof tanks at the terminal contain gasoline with less than 7.6% MTBE and should the loading rack throughput of gasoline be less than one-half of the annual limit in Condition 7.1.6, then the Permittee need not calculate HAP emission data each month but when the annual HAP data is prepared it must be done for all twelve months and an analysis made to verify that a rolling 12-month total never exceeded 10 tons for an individual HAP or 25 tons for all HAPs combined.

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 219.585(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 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

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

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

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

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

c. Should the terminal stop managing gasoline containing MTBE [as characterized in 40 CFR 63.420(a)], then the terminal will not be required to report HAP emission data as required by this or any other condition of the permit other than as required in the annual emission inventory pursuant to Condition 9.7. This is based on a screening equation evaluation for the facility that indicates the terminal as an area (minor) source for HAPs at a gasoline throughput of 950 million gallons/year if the Permittee only manages gasoline that does not contain MTBE as characterized in 40 CFR 63.420(a). The Permittee is

required to report this change to Illinois EPA in within 30 days of the change in the type of gasoline managed. The Permittee is also required to comply with the recordkeeping requirements in 40 CFR 63.420(c) upon commencing the change in demonstrating area (minor) source status for HAPs.

d. Should the terminal discontinue use of MTBE in part such that less than one-half of the floating roof tanks at the terminal contain gasoline with less than 7.6% MTBE and should the loading rack throughput of gasoline be less than one-half of the annual limit in Condition 7.1.6, then the Permittee must calculate and report the information required by a and b above once per year when the annual HAP emissions are calculated and reported.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

a. The Permittee is authorized to store petroleum materials with a vapor pressure less than 1.5 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. For the purpose of estimating VOM emissions from the storage tanks, the most current version of the TANKS program is acceptable.

b. For the purpose of estimating fugitive VOM emissions from components at the facility, the emission factors found in "Marketing Terminal Emission Factors" published by USEPA on the Technology Transfer Network bulletin board in

February, 1995 or the best available emission factors, including factors developed by the source, are acceptable.

c. For the purpose of estimating HAP emissions from equipment at the facility, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

d. 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 loading rack (Condition 7.7) and fugitives.

5.10 Special 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 219.142 as Condition 5.4 establishes appropriate compliance procedures for this rule that do not rely on such measurements.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Truck Loading Rack
Control: Vapor Recovery Unit

7.1.1 Description

The truck loading/unloading rack is used to load and unload various petroleum products, including gasoline, distillate fuels, aviation fuels, ethanol and mixtures of the same. The Permittee operates a loading rack that consists of 10 bays that include a total of 10 loading points. The VOM emissions from the truck loading rack occur when material is loaded into delivery vehicles. A vapor recovery unit is used to capture and recover 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 the material is loaded into, with the exception of fugitive emissions that are attributed to leaking components, i.e., valves, flanges, …etc.

The vapor recovery unit employed by the Permittee is a carbon adsorption unit.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Loading Rack with Vapor Recovery	Ten bay loading rack used for loading various petroleum products, ethanol, and into tank trucks	Vapor Recovery Unit

7.1.3 Applicability Provisions and Applicable Regulations

a. For the purposes of loading gasoline, 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 219.582 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 219.582.

b. The above requirements of 35 IAC 219.582 only apply to loading of gasoline. The Permittee may directly vent emissions from the loading of distillate products on a voluntary basis. Consequently, during

malfunction or breakdown of the vapor recovery unit, non-gasoline products may continue to be loaded since no requirement is violated.

c. For the purposes of loading ethanol, the loading rack is not an affected loading rack at the source used to transfer VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294°K (70°F). The vapor pressure of pure ethanol is below 1.0 psia. Compliance with 35 IAC 219.122 is demonstrated by limiting the loading rack to only the loading of ethanol as the only VOL. The VRU is required to be used for the loading of ethanol into trucks.

7.1.4 Non-Applicability of Regulations of Concern

The affected loading rack was constructed in 1979 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.

7.1.5 Control Requirements and Operational Limitations

See Condition 7.1.6

7.1.6 Emission Limitations

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

a. i. The total organic compound emissions from the affected loading rack and associated vapor recovery unit shall not exceed 30 milligrams per liter of material loaded.

ii. Pursuant to the request of the Permittee, the monthly and annual throughput of gasoline shall not exceed 200,000,000 gallons/month and 950,000,000 gallons/year.

b. The above limitations are being established in this permit. These limits ensure that the affected loading rack is not subject to the NESHAP for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) 40 CFR 63 Subpart R.

7.1.7 Operating Requirements

a. 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 219.582(a)(2)]

b. There shall be no liquid drainage from the loading device of an affected loading rack when it is not in use. [35 IAC 219.582(a)(3)]

c. 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. If a leak is discovered in the vapor collection system, it shall be repaired within 15 business days and retested. [35 IAC 219.582(b)(2) and (3), 219.582(b)(1)(A) and (C)]

d. All loading and vapor return lines shall be equipped with fittings which are vapor tight. [35 IAC 219.582(a)(4)]

e. 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 219.584(b) or (d) or the delivery vessel has provided a current certification as required by 35 IAC 219.584(c)(3), and the delivery vessel meets the following requirements [35 IAC 219.582(a)(5) and 219.584(a)]:

i. Includes a vapor space connection that is equipped with fitting which is 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. Is not refilled in Illinois at other than:

A. Bulk gasoline terminals that comply with the requirements of 35 IAC 219.582; or

B. Bulk gasoline plants that comply with the requirements of 35 IAC 219.581(b).

vi. 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.

vii. In lieu of the requirements of Condition 7.1.7(e)(i – vi), the Permittee may comply with 40 CFR 63.425(e).

7.1.8 Inspection and Monitoring Requirements

a. Continuous monitoring equipment that is approved by the Illinois EPA shall be installed, calibrated, maintained and operated according to vendor specifications and in use 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 219.105(d)(2)(A)]

b. The Permittee shall inspect all components of the vapor control system for leakage as follows to assure compliance with Condition 7.1.7(d):

i. Pumps seals shall be visually inspected for leaks on at least a monthly basis.

ii. All valves and the coupler that connects to the delivery vessel shall be inspected by a portable detection unit between March 1st 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.

7.1.9 Recordkeeping Requirements

Pursuant to Section 39.5(7)(b) of the Act the following records shall be kept.

a. General Recordkeeping

The Permittee shall maintain records of the following for each affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.1.5(a) and (b), 7.1.7 and 7.1.8.

i. The identification and properties of each organic liquid distributed through each affected loading rack, as related to emissions, i.e., vapor pressure and molecular weight;

ii. The amount of each organic liquid distributed through each affected loading rack, in barrels per day, month and year, 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 7.1.5 and 7.1.7:

i. The use of an affected loading rack for loading of any gasoline tank truck when the associated VRU was not operating at the appropriate pressure drop, including:

A. The date and time of the loading;

B. The specific problem with the VRU monitor;

C. Type of material loaded; and

D. The reason that loading occurred even though the VRU was not operating at the appropriate pressure drop.

ii. The use of an affected loading rack for the loading of any nonvapor-tight gasoline tank (one not meeting the requirements of Condition 7.1.7) 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 7.1.7), including:

A. The date and time of the loading;

B. The specific reason the vessel did not meet the requirements of Condition 7.1.7;

C. Type of material loaded; and

D. The reason why loading was allowed.

iii. For any delivery vessel owned or operated by the Permittee, the Permittee shall:

A. Maintain copies of any tests required under Condition 7.1.7 for a period of 5 years;

B. Provide copies of these tests to the Illinois EPA upon request; and

C. Provide annual test result certification to bulk gasoline plants and terminals where the delivery vessel is loaded.

c. Records of Inspection

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

A record of each leak inspection required by Condition 7.1.8(b) 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 records of any gasoline tank truck which is loaded at this terminal and which did not have a proper and up-to-date sticker, decal or stencil which indicates it had met the requirement of Condition 7.1.7(e).

7.1.10 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 7.1.5(b), 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. If the throughput of gasoline is less than one-half the annual limit in Condition 7.1.5(b) for the previous calendar year, then the detailed information required by Condition 7.1.10(a)(i) is not required. A statement of throughput for the year will suffice in place of a running total.

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 7.1.7, including:

A. The date and time of the loading;

B. The specific reason the vessel did not meet the requirements of Condition 7.1.7;

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 in accordance with Condition 8.6.1.

i. Summary of any use of an affected loading rack when the VRU was not operating at the appropriate pressure drop, including:

A. Date and time of occurrence;

B. Specific problem associated with the VRU;

C. Type of material being loaded; and

D. Reason why loading continued.

ii. Summary of times when the continuous monitoring equipment was not functioning, including:

A. Date and time of occurrence; and

B. Specific problem associated with the indicator or recording equipment.

c. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from 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 7.1.5(a) or (b).

d. Reporting of Malfunction or Breakdown

The Permittee shall promptly notify the Illinois EPA, Collinsville Region Office on the same or next working day of any malfunction or breakdown of the vapor recovery unit and gasoline continued to be loaded, 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.

7.1.11 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:

> Any delivery vessel which has undergone and passed a test in another state which has a USEPA-approved leak testing and certification program will satisfy the requirements of subsection (a) of this Section. Delivery vessels must display a sticker, decal or stencil approved by the state where tested.

7.1.12 Compliance Procedures

a. Compliance with the emission limitations of Condition 7.1.5(a) and (b) and the operating requirements of Condition 7.1.7 shall be demonstrated through the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.1.8, 7.1.9, and 7.1.10.

b. Compliance with the control requirements of 7.1.5(a) and (b) shall be demonstrated by the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.1.8, 7.1.9, and 7.1.10 and the fact that compliance of the affected loading rack and associated vapor recovery unit have previously been demonstrated by previous emissions testing.

c. VOM emissions from the loading rack shall be determined by use of the following equation:

Total Emissions (lb/month) = Uncontrolled Emissions x Control Efficiency of the VRU.

Where:

Uncontrolled Emissions (lb/month) = Gasoline Throughput x LL_g + Distillate Throughput x LL_D + Ethanol Throughput x LL_e

Where the gasoline and ethanol throughputs are in gallons/month and

LL_g = 9.367 lb/1000 gallons of gasoline loaded
LL_D = 0.019 lb/1000 gallons of distillate loaded
LL_e = 0.538 lb/1000 gallons of ethanol loaded

The emission factor listed above are the loading loss emissions factors for gasoline, distillates, and ethanol, respectively, based on the AP-42 equation for loading of tank trucks. In addition to these factors, the emission factors found in AP-42, published by USEPA, or the best available emission factors, including factors developed by the source including factors developed through stack testing, are acceptable.

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

7.1.13 Compliance Schedules

a. The Illinois EPA has determined that loading rack VRU is not in compliance with the monitoring requirements of 35 IAC 219.105(d)(2)(A). Therefore, the permit shield in Section 8.1 does not shield the Permittee from possible enforcement actions initiated by either USEPA or the Illinois EPA involving the above named emission units or activities. Compliance with the terms of this permit does not serve as proof of compliance for the VRU. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such enforcement action or other outstanding issued initiated pursuant to the alleged violations of 35 IAC 219.105(d)(2)(A). (e.g., include a new compliance schedule, identify appropriate applicable requirements, establish new requirements, and revise the ERMS baseline)

b. The Permittee shall comply with the following schedule of compliance to address compliance with the alleged violations of 35 IAC 219.105(d)(2)(A):

Milestone	Timing
The Permittee shall follow the schedule established by the Permittee in form 294-CAAPP is received by the Illinois EPA on May 2, 2002	The schedule calls for installation and startup by Aug. 2, 2002 and submittal of a final report by Aug. 31, 2002 or within 15 days of achieving compliance.

Milestone	Timing
The Permittee shall submit to the Illinois EPA Compliance Section for review and approval the specifications for the monitor that the Permittee has chosen to install. Among the items to be included in the specifications are range of measurements (in ppm or % VOM), frequency of measurements (e.g. every minute), averaging times, the set point for an alarm, the margin between alarm value and noncompliance, records that will be kept, and an explanation of actions to be taken if one or multiple alarms occur on the same day. The Permittee shall cooperate with recommendations of the Illinois review panel.	The specifications shall be submitted within 30 days of issuance of this permit.
The Permittee shall achieve full compliance with all requirements resulting from resolution of enforcement issues regarding the alleged violation of 35 IAC 219.105(d)(2)(A)	No later than any schedule established pursuant to resolution of any pending or future enforcement action pertaining to the alleged violation of 35 IAC 219.105(d)(2)(A)

The final report shall describe the type of monitor to be used (i.e., a breakthrough monitor), the values to be used to determine compliance with 7.1.8(a) (i.e., the average value and averaging time to be used to determine if breakthrough has occurred).

The Permittee is not responsible for delays on the part of the Illinois EPA to approve the plan. Excluding any supplementary schedule established pursuant to any pending or future enforcement action, actions on the part of the Illinois EPA will not count against any schedule included in the plan.

c. Submittal of Progress Reports

If final compliance is not achieved by August 31, 2002, the report required by that date shall include the reasons why compliance was not achieved and a new date as to when compliance will be achieved.

d. The Permittee shall submit a written notification to the Illinois EPA Compliance Section within 15 days of coming into full compliance with 35 IAC 219.105(d)(2)(A).

7.2 Unit: Storage Tanks
Control: Internal floating roof storage tanks

7.2.1 Description

The Permittee operates 19 internal floating roof storage tanks to store various petroleum products and ethanol. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

One tank, Tank 201 is used for the storage of ethanol or petroleum products, as allowed under permit 99020085. When the tank is in ethanol (VOL) service, the tank is subject to the requirements of 35 IAC 219.120. When the tank is in VPL service, the tank is subject to 40 CFR 60 Subpart K. When in gasoline service the tank is not subject to 35 IAC 219.123(b).

The remaining 18 tanks are used for the storage of petroleum products. Eight of these tanks (Nos. 105, 106, 107, 205, 257, 294, 295 and 296) are subject to the NSPS for storage tanks, 40 CFR 60 Subpart K. Because they are subject to a NSPS, they are not subject to 35 IAC 219.123(b). These are referred to as Group 1 tanks. Group 2 tanks are not subject to NSPS, but are subject to 35 IAC 123(b).

Several tanks were originally external floating roof tanks but were then fitted with a dome which changes their classification to an internal floating roof. While they were external floating roof tanks they were equipped with rim-mounted secondary seals. The Permittee has kept these in place and voluntarily continues to inspect and repair the seals although not required to do so since they are now classified as internal floating roof tanks.

7.2.2 List of Emission Equipment and Pollution Control Equipment[a]

Storage Tank	Description	Emission Control Equipment
Group 1 Tanks, Subject to NSPS Subpart K		
105, 106, 201 (when in VPL Service)	Internal Floating Roof Tank	Floating roof, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
107	Internal Floating Roof Tank	Floating roof with dome, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe

Storage Tank	Description	Emission Control Equipment
205, 257, 294, 296	Internal Floating Roof Tank	Floating roof with dome, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
295	Internal Floating Roof Tank	Floating roof, liquid-mounted resilient primary seal, and a permanent submerged loading pipe
Group 2 Tanks, Not Subject to NSPS		
204	Internal Floating Roof Tank	Floating roof, metallic shoe primary seal, and a permanent submerged loading pipe
268, 269	Internal Floating Roof Tank	Floating roof with dome, liquid-mounted resilient primary seal, rim-mounted secondary seal and a permanent submerged loading pipe
201, 280, 281, 282, 283, 284	Internal Floating Roof Tank	Floating roof, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
292	Internal Floating Roof Tank	Floating roof with dome, vapor-mounted resilient primary seal and a permanent submerged loading pipe
293	Internal Floating Roof Tank	Floating roof with dome, metallic shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe

[a] Further details are provided in Attachment 1. The terms metallic shoe used in this list and mechanical shoe used in Attachment 1 are two descriptions that mean the same.

7.2.3 Applicability Provisions

An “affected tank,” for the purposes of these unit-specific conditions, is a storage tank that is subject to the requirements of 35 IAC 219.121, 219.122(b), and 219.123. Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, storing

volatile petroleum liquid (VPL), is subject to the requirements of 35 IAC 219.123(b) unless it is specifically excluded pursuant to 35 IAC 219.123(a). Group 1 Tanks are exempt from some of the requirements based on applicability of a NSPS [35 IAC 219.122(a)(5)]. A tank also may be exempt due to the current service, features, or other circumstances associated with the tank (see Condition 5.8). A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3°K (70°F).

When in VOL service (Tank 201), an "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 219.120(a) and 219.122(b) that relies upon a permanent submerged loading pipe and internal floating roof for compliance. An affected storage tank is subject to the control requirements of 35 IAC 219.120(a) if it has a capacity greater than or equal to 40,000 gallons storing a VOL with a vapor pressure of 0.75 psia or more but less than or equal to a maximum true vapor pressure of 11.1 psia. [35 IAC 219.120(a)(1)]

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. The affected tank(s), with the exception of 201 when in ethanol service, are not subject to the requirements of 35 IAC 219.120 pursuant to 35 IAC 219.119(e) because the tanks are used solely for the storage of petroleum liquids.

b. Each affected Group 2 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.

c. Group 1 Tanks are not subject to 35 IAC 219.123 when in VPL service because they are subject to a NSPS [35 IAC 219.123(a)(5)]. Though these tanks are subject to 35 IAC 219.121, compliance with Subpart K is deemed to be more stringent and will demonstrate compliance with 35 IAC 219.121.

d. Tank 201 is not subject to NSPS Subpart K when in VOL service as NSPS Subpart K is only applicable to tanks in petroleum liquid service, except that when in VOL service it is subject to the recordkeeping requirements of 40 CFR 60.113.

e. The affected tanks are not subject to 35 IAC 219.124 because the tanks are considered internal floating roof tanks.

7.2.5 Control Requirements

a. Group 1 and Group 2 storage tanks shall be equipped with a floating roof which rests on the surface of the VOL that is equipped with a primary seal [35 IAC 219.121(b)(1) and 40 CFR 60.112(a)(1)];

b. For Group 2 storage tanks all openings of the floating roof deck, other than drains, shall be equipped with covers, lids or seals [35 IAC 219.123(b)(3)]; and

c. Group 1 and Group 2 storage tanks shall have a permanent submerged loading pipe. [35 IAC 219.122(b)]

d. When Tank 201 is in ethanol (VOL) service the following control Requirements apply:

i. An internal floating roof which 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 219.120(a)(1)(A)]

ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof [35 IAC 219.120(a)(1)(B)]:

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

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

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

iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [35 IAC 219.120(a)(1)(C)]

iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use [35 IAC 219.120(a)(1)(D)]

v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [35 IAC 219.120(a)(1)(E)]

vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [35 IAC 219.120(a)(1)(F)]

vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [35 IAC 219.120(a)(1)(G)]

viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [35 IAC 219.120(a)(1)(H)]

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

a. Group 2 storage tanks shall be operated so that the floating roof including the seal closure devices meet each of the following requirements:

i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 219.123(b)(2)];

ii. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:

A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 219.123(b)(3)(A)];

B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 219.123(b)(3)(B)]; and

C. 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 [35 IAC 219.123(b)(3)(C)].

b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected Group 1 or Group 2 tank, except during sampling or maintenance operations [35 IAC 219.121 (b)(1)].

7.2.8 Inspection Requirements

a. The Permittee shall inspect the floating roof seals of each affected Group 2 tank once every six months. Compliance will be demonstrated with the timing of the inspections if two inspections occur within a calendar year with one taking place in January through June and the second taking place in July through December; or if the inspections are not more than 190 days apart. [35 IAC 219.123(b)(4)].

b. The Permittee shall perform a complete inspection of the cover and seals of each affected Group 2 tank whenever the tank is emptied and degassed for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made that require the tank to be emptied and degassed as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 219.123(b)(5)].

c. When Tank 201 is in ethanol service (VOL), the following inspection requirements will apply:

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 IAC219.127(a)(1)]

ii. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this subsection cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the owner or operator may request a 30-day extension from

the Illinois EPA in the inspection report required in 35 IAC 219.129(a)(3). 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 30 days. [35 IAC 219.127(a)(2)]

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

A. Visually inspect the vessel as specified in subsection (iv) below at least every 5 years; or

B. Visually inspect the vessel as specified in subsection (ii) above.

iv. 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 in this subsection exist 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 subject to the annual visual inspection as specified in subsections (ii) and (iii)(B) above and at intervals no greater than 5 years in the case of vessels specified in subsection (iii)(A) above.

v. Notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by subsections (i) and (iv) above to afford the Illinois EPA the opportunity to have an observer present. If the inspection required by subsection (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 219.127(a)(5)]

7.2.9 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 (Group 1 and 2) in VPL service, pursuant to 35 IAC 219.123(b)(6) or 40 CFR 60.113:

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. For Group 2 tanks the results of any inspections or measurements required by the Condition 7.2.8(a) and/or (b), 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 Group 2 tank to demonstrate

compliance with Condition 7.2.8(b) (Cover and Seal Inspection) [35 IAC 219.123(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.

c. When Tank 201 is in VOL service (ethanol) the Permittee shall maintain records and furnish reports as required below.

i. Keep a record of each inspection performed as required by Condition 7.2.8(c). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings);

ii. If any of the conditions described in Condition 7.2.8(c) are detected during the annual visual inspection required, 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; and

iii. After each inspection required Condition 7.2.8(c)(iii) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 7.2.8(c) 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 Conditions 7.2.5(e) or 7.2.8(c) and list each repair made. [35 IAC 219.127(a)]

7.2.10 Reporting Requirements

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

a. 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 7.2.5,

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.

b. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.2.5) 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.

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:

a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions 7.2.5 of this permit.

b. Changes accounted for in Condition 5.8.

c. The primary seals may be replaced with the same or a different type. Secondary seals may be replaced but must be rim-mounted.

7.2.12 Compliance Procedures

a. Emissions from each affected storage tank shall be determined through the use of the TANKS program, AP-42 upon which the Tanks Program is based, or any other method that utilizes USEPA approved emission factors for storage tank emissions.

b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt percent (based on a 1992 USEPA survey 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. Other means of estimating HAP emissions utilizing USEPA accepted methodologies is also acceptable.

7.3 Unit: External Floating Roof Storage Tanks
Control: Secondary Seals and Submerged Loading Pipe

7.3.1 Description

The Permittee operates five 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.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
149	External Floating Roof Tank	Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
155	External Floating Roof Tank	Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
287	External Floating Roof Tank	Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
288	External Floating Roof Tank	Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
289	External Floating Roof Tank	Floating roof, mechanical shoe primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe

7.3.3 Applicability Provisions

An “affected tank,” for the purposes of these unit-specific conditions, is a storage tank that is only subject to the requirements of 35 IAC 219.121, 219.122(b), 219.123, and 219.124. Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, storing volatile petroleum liquid (VPL), equipped with an

external floating roof is subject to the requirements of 35 IAC 219.124(a) unless it is exempted pursuant to 35 IAC 219.124(b). Tank Nos. 107, 205, 257, 294 and 296 are exempt from § 219.123(b) based on applicability of a NSPS. A tank also may be exempt due to the current service, features, or other circumstances associated with the tank. A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3°K (70°F).

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 that are subject to 35 IAC 219.124(a), is summarized in Attachment 1.

7.3.4 Non-Applicable Regulations

a. The affected tank(s) are not subject to the requirements of 35 IAC 219.120 pursuant to 35 IAC 219.119(e) because the tanks are used solely for the storage of petroleum liquids.

b. 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.

7.3.5 Control Requirements

Each affected tank shall be equipped with the following:

a. A floating roof which rests on the surface of the VOL that is equipped with a primary seal [35 IAC 219.121(b)(1)];

b. A floating roof that is equipped with a continuous seal extending from the floating roof to the tank wall (rim mounted secondary seal) [35 IAC 219.124(a)(1)] (The Illinois EPA has not approved use of other equivalent equipment in lieu of a rim mounted secondary seal.);

c. All drains (for drainage of rainwater, also know as "stub drains") in the floating roof deck shall be provided with slotted membrane fabric covers or equivalent covers across at least 90 percent of the area of the opening [35 IAC 219.124(a)(3)];

d. All openings of the floating roof deck, other than drains, shall be equipped with projections into the tank which remain below the liquid surface at all times except when supported on the roof legs and be

equipped with covers, lids or seals [35 IAC 219.124(a)(4)]; and

e. A permanent submerged loading pipe. [35 IAC 219.122(b)]

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:

N/A

7.3.7 Operating Requirements

a. Each affected tank shall be operated so that the floating roof including the seal closure devices meet the following requirements:

i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 219.123(b)(2)];

ii. The seal is intact and uniformly in place around the circumference of the floating roof between the floating roof and tank wall [35 IAC 219.124(a)(2)(A)];

iii. 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 219.124(a)(2)(B)]; and

iv. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:

A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 219.123(b)(3)(A)];

B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 219.123(b)(3)(B)]; and

C. 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 [35 IAC 219.123(b)(3)(C)].

b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 219.121 (b)(1)].

7.3.8 Inspection Requirements

a. The Permittee shall inspect each affected tank prior to May 1 of each year, to insure compliance with the applicable control and operating requirements [35 IAC 219.124(a)(5)].

b. i. The Permittee shall measure the secondary seal gap of each affected tank prior to May 1 of each year. This measurement shall be conducted in accordance with the methods and procedures specified in 40 CFR 60, Subpart Kb [35 IAC 219.124(a)(6)].

ii. Prior notification for the above measurements shall be given to the Illinois EPA as specified in Condition 7.3.10(b).

c. The Permittee shall perform a complete inspection of the cover and seals of each affected tank whenever the tank is emptied and degassed for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made that require degassing of the tank as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 219.123(b)(5)].

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, pursuant to 35 IAC 219.123(b)(6) and 219.124(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 7.3.8(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 7.3.8(c) (Cover and Seal Inspection) [35 IAC 219.123(b)(6)]:

Records that are sufficient to identify whenever the tank is emptied and degassed 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, 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.

b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations 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 7.3.5, 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 7.3.5) 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.

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 accounted for in Condition 5.8.

c. The primary seals may be replaced with the same or a different type. Secondary seals may be replaced but must be rim-mounted.

7.3.12 Compliance Procedures

a. Emissions from each affected storage tank shall be determined through the use of the TANKS program, AP-42 upon which the Tanks Program is based, or any other method that utilizes USEPA approved emission factors for storage tank emissions.

b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt percent (based on a 1992 USEPA survey 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. Other means of estimating HAP emissions utilizing USEPA accepted methodologies is also acceptable.

7.4 Unit: Other Emission Units
Control: See Condition 7.4.2

7.4.1 Description

This section includes storage tanks that do not have floating roofs and other units such as oil-water separators.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Tank No. T100	16,000 Gallon Fixed Storage Tank Containing Interface	Submerged Loading Pipe
Gasoline Tank	2,500 Gallon Horizontal Storage Tank	Submerged Loading Pipe
Tank 155 Truck Loading	Recovered Oil is Pumped Directly from Tank to Truck	
API Oil-Water Separator	Separates a Layer of Oil From Wastewater	10 of 16 Cells Have Floating Roof, 6 Have Fixed Covers
V-100 Oil-Water Separator V-100	Separates a Layers of Oil From Recovery Wells Water	None
SVE	Soil Vapor Extraction Remediation System (5 Engines)	Internal Combustion Engines
Rail Car Loading	Distillate Railcar Loading Operations	None

7.4.3 Applicability Provisions and Applicable Regulations

a. The “affected tanks” for the purpose of these unit-specific conditions, are tanks that are not required to have a floating roof because its size. These tanks are listed in Condition 7.4.2.

b. Each affected tank is subject to 35 IAC 219.122(b). This rule requires the use of a submerged loading pipe if the vapor pressure of the stored material is 2.5 psia or greater. All of the affected tanks have submerged loading pipes although the vapor pressure of interface is less than 2.5 psia.

c. The affected tank 155 truck loading rack and distillate rail car loading operation are subject to 35 IAC 219.122(a) which states that no person shall cause or allow the discharge of more than 8 lb/hr of organic material into the atmosphere during the loading of any organic material from the aggregate

loading pipes of any loading area having throughput of greater than 40,000 gal/day into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions. If no odor nuisance exists this limitation shall only apply to the loading of VOL with a vapor pressure of 2.5 psia or greater at 70°F.

d. Each affected oil-water separator is subject to 35 IAC 219.141. This rules states that no person shall use any single or multiple compartment effluent water separator which receives effluent water containing 200 gal/day or more of organic material from any equipment processing, refining, treating, storing or handling organic material unless such effluent water separator is equipped with air pollution control equipment capable of reducing by 85 percent or more the uncontrolled organic material emitted to the atmosphere. Exception: If no odor nuisance exists the limitations of this subsection shall not apply if the vapor pressure of the organic material is below 2.5 psia at 70°F.

e. The soil vapor extraction (SVE) remediation system is subject to 35 IAC 219.301. This rule limits emissions to 8 lb/hr if the material is photochemically reactive pursuant to the definition in 35 IAC 211.4690 or § 219.302 allows a higher rate is controlled by 85% by an afterburner or vapor recovery system or an approved system. The use of an engine to reduce emissions by 85% has not been approved, but each engine system is a separate emission unit and any individual unit is unlikely to emit over 8 lb/hr based on the extraction rate and the material is not photochemically reactive.

f. Each affected process is subject to the emission limits identified in Condition 5.2.2.

7.4.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected tanks not being subject to the New Source Performance Standards (NSPS) for Storage Tanks, 40 CFR Part 60, Subparts K, Ka, or Kb, because the affected tanks have a lower capacity than the criteria in the NSPS or were constructed prior to the applicability date. The two tanks that are greater than 10,000 gallons capacity are required to keep records of the tank dimensions. See Condition 7.4.10.

b. This permit is issued based on the affected units not being subject to 40 CFR Part 64, Compliance Assurance

Monitoring (CAM) for Major Stationary Sources, because the affected units do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels and they use a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.4.5 Control Requirements and Work Practices

a. The floating roofs on the API separator shall be operated in accordance with the manufacturer's recommended work practices and maintenance schedules.

b. The SVE systems may be relocated around the facility on an as-needed basis to facilitate remediation. The conditions on the SVE system will cease if the equipment is removed from the facility.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected V-100 oil-water separator is subject to the following:

Emissions from the affected V-100 oil-water separator shall not exceed the following limits:

VOM Emissions	
(Ton/Month)	(Ton/Year)
0.2	2.2

These limits are based on the maximum rate.

The above limitations contain revisions to previously issued Permit 72120719. 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 permit included an hourly rate but that has been changed to a monthly rate for ease of recordkeeping. The annual limit has not been changed [T1R].

The loading of railcars with distillate is limited to 150,000,000 gallons/month and 180,000,000 gallons/year and VOM emissions shall not exceed 2.42 tons/year, this limit was in previously issued Permit 00090014. The emission limitation of 2.42 tons/year of VOM is the maximum potential emissions from loading 180,000,000 gallons/year.

The Soil Vapor Extraction System (SVE) is comprised of five engines which shall not exceed the following limits as established in permit 00100046:

Pollutant	Lb/Hr Each	Ton/Year Each	Ton/Year Total (5 Engines
NO_x	0.51	2.22	19.96
CO	0.31	1.35	12.15
SO_2	0.09	0.38	3.42
VOM	0.23	0.99	8.94
PM	0.05	0.20	1.77

These values for the SVE system are based on each engine operating 8,760 hours per year.

The above limitations for rail car distillate loading and the SVE system were established in the permits cited, pursuant to 35 IAC Part 203 and/or PSD, 40 CFR 52.21. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 or PSD [T1].

7.4.7 Operating Requirements

The SVE system shall only use propane and/or recovered hydrocarbon vapor in the engines as fuel.

7.4.8 Inspection Requirements

See Condition 7.4.5

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 each affected tank, tank loading operation or

separator to demonstrate compliance with Conditions 5.5.1, 7.4.3 and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

a. Vapor pressure of materials stored in tanks, materials loaded into truck or rail cars and of the oil in separators.

b. Throughput of each storage tank, separator and rail car or truck loading operation (gal/mo).

c. VOM emissions from each affected unit (lb/mo).

d. The VOM concentration, propane fuel usage and equipment hours of operation of the SVE system in order that compliance with the emission limitations in Condition 7.4.6 may be verified.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected oil-water separator 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 exceeding the allowables of Condition 7.4.6.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

a. VOM emissions from each unit shall be calculated using AP-42 emission factors or the TANKS program, USEPA approved factors including protocols and programs based on those factors, published by USEPA, or the best available emission factors, including factors developed by the source including factors developed through stack testing.

b. Compliance with the VOM limitation of 2.42 tons/year for railcar distillate loading shall be demonstrated by maintaining records of the amount of distillate loaded on a rolling 12 month basis.

c. Compliance with the emission limitations for the SVE system shall be demonstrated by records that track the hours of operation and records on organic material concentration and fuel usage.

7.5 Unit: Fugitives from Leaking Components
Control: None

7.5.1 Description

Fugitive emissions are emissions from equipment components, such as valves, flanges,…etc., that are generated during the processing of material through the piping distributed throughout the source.

7.5.2 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

7.5.3 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 219.142, 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 219.142. Also note that leaks in the vapor collection system were addressed in Condition 7.1.8.

7.5.4 Non-Applicable Regulations

N/A

7.5.5 Control Requirements

None

7.5.6 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.

7.5.7 Operating Requirements

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

7.5.8 Inspection Requirements

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

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the piping components at the source to demonstrate compliance with Condition 7.5.4 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/month and tons/year, with supporting calculations, calculated utilizing the compliance procedures in Condition 7.5.12 or other approved USEPA methodology;

7.5.10 Reporting Requirements

None

7.5.11 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

7.5.12 Compliance Procedures

Fugitive VOM emissions pursuant to the overall VOM emissions limitation of Condition 5.5 and reporting requirements 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_i = The specific component's (i.e., valves, pump seals, etc.) emission factor listed below. Emission factors found in

"Development of Fugitive Emission Factors and Emission Profiles for Petroleum Marketing Terminals, Volume 1, Published by the American Petroleum Institute; and

Component	Light liquid [a]	Heavy liquid [b]	Vapor[c]
Connectors	2.3×10^{-5}	Negligible	6.7×10^{-5}
Valves	1.5×10^{-4}	Negligible	1.6×10^{-4}
Open-Ended Lines	6.7×10^{-3}	Negligible	6.7×10^{-3}
Pump Seals	9.3×10^{-4}	Negligible	0.00
Other[d]	2.87×10^{-4}	Negligible	2.65×10^{-4}

[a] Light liquid - not in gas/vapor service or heavy liquid service.;

[b] Heavy liquid – material in a liquid state in which the with a vapor pressure less than or equal to 0.1 psia at 100° F

[c] Vapor - material in a pressurized gaseous state at operating conditions which excludes the vapor collection system; and

[d] Other means any components other than connectors, valves, open-ended lines, and pump seals

N_i = 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 7.5.9.

Total annual emissions, in tons/year, shall be calculated by multiplying the hourly emission by 8760 hr/year or the period of time a particulate system was in operation. For instance, if a component of gasoline is only added during part of the year, the pump that moves that component may use the hours in that part of the year.

Other factors published by USEPA, including those published by USEPA in the November, 1995 publication "Protocol for Equipment Leak Emission Estimates" or any subsequent revision are also deemed acceptable.

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 total fugitive VOM emissions. Total fugitive HAP emissions will be 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 March 22, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

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

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

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

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

   i. Describe the physical or operational change;

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

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

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

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

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

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

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

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

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

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

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

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

8.6.3 Test Reports

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

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
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 thereunder.

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

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

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

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

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

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

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

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

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Significant[a] Storage Tanks

TABLE 1-1

Tank No	Nominal Tank Capacity (Gal)	Product Stored	Tank Type[a]	Primary Seal	Secondary Seal	Construction Date	NSPS Status
							40 CFR 60 Subpart
149	58,000	Petroleum Products	External Float	Mechanical Shoe	Rim Mounted	Pre-1973	
155	801,000	Petroleum Products	External Float	Mechanical Shoe	Rim Mounted	Pre-1973	
287	2,552,000	Petroleum Products	External Float	Mechanical Shoe	Rim Mounted	Pre-1973	
288	2,552,000	Petroleum Products	External Float	Mechanical Shoe	Rim Mounted	Pre-1973	
289	2,552,000	Petroleum Products	External Float	Mechanical Shoe	Rim Mounted	Pre-1973	
105	759,000	Petroleum Products	Internal Float	Mechanical Shoe	Rim Mounted	1973	K
106	759,000	Petroleum Products	Internal Float	Mechanical Shoe	Rim Mounted	1973	K
107	3,048,000	Petroleum Products	Internal Float D	Mechanical Shoe	Rim Mounted	1974	K
201	3,111,000	Ethanol/ Petroleum Products	Internal Float	Mechanical Shoe	Rim Mounted	1975	K
204	950,000	Petroleum Products	Internal Float	Mechanical Shoe	None	Pre-1973	
205	3,119,000	Petroleum Products	Internal Float D	Mechanical Shoe	Rim Mounted	1978	K
257	4,620,000	Petroleum Products	Internal Float D	Mechanical Shoe	Rim Mounted	1978	K
268	4,410,000	Petroleum Products	Internal Float D	Liquid Mounted	Rim Mounted	Pre-1973	

Tank No	Nominal Tank Capacity (Gal)	Product Stored	Tank Type[a]	Primary Seal	Secondary Seal	Construction Date	NSPS Status
							40 CFR 60 Subpart
269	4,620,000	Petroleum Products	Internal Float D	Liquid Mounted	Rim Mounted	Pre-1973	
280	3,045,000	Petroleum Products	Internal Float	Mechanical Shoe	Rim Mounted	Pre-1973	
281	4,620,000	Petroleum Products	Internal Float	Mechanical Shoe	Rim Mounted	Pre-1973	
282	2,552,000	Petroleum Products	Internal Float	Mechanical Shoe	Rim Mounted	Pre-1973	
283	2,552,000	Petroleum Products	Internal Float	Mechanical Shoe	Rim Mounted	Pre-1973	
284	2,552,000	Petroleum Products	Internal Float	Mechanical Shoe	Rim Mounted	Pre-1973	
292	3,722,000	Petroleum Products	Internal Float D	Vapor Mounted	None	Pre-1973	
293	3,722,000	Petroleum Products	Internal Float D	Mechanical Shoe	Rim Mounted	Pre-1973	
294	9,047,000	Petroleum Products	Internal Float D	Mechanical Shoe	Rim Mounted	1974	K
295	4,620,000	Petroleum Products	Internal Float	Liquid Mounted	None	1974	K
296	5,460,000	Petroleum Products/ Toluene	Internal Float D	Mechanical Shoe	Rim Mounted	1974	K
T100	16,000	Petroleum Products/ Interface	Fixed Roof	None	None	1991	
Gasoline	2,500	Petroleum Products	Horizontal	None	None	1990	

[a] A “D” on Internal Float means a geodesic dome was added to a former external floating roof tank.

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: _____

10.3 Attachment 3 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 Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or

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

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;

- Are not required to be processed as a significant permit modification; and

- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

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, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT 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.

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.

10.5 Attachment 5 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.

3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.

4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.

5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.

6. Information addressing any outstanding transfer agreement pursuant to the ERMS.

7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT,

as existing information is being incorporated by reference.

b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.

9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

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

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control

Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

DGP:psj