

FINAL DRAFT/PROPOSED CAAPP PERMIT  
GATX Terminals Corporation - Argo Terminal  
I.D. No.: 031012AEA  
Application No.: 95120128  
April 6, 2000

217/782-2113

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

PERMITTEE

GATX Terminals Corporation  
Attn: Dennis Majerczak  
8500 West 68th Street  
Argo, Illinois 60501

Application No.: 95120128                      I.D. No.: 031012AEA  
Applicant's Designation: ARGO TERMINAL    Date Received: December 26, 1995  
Operation of: Bulk Storage Facility  
Date Issued: TO BE DETERMINED              Expiration Date<sup>2</sup>: DATE  
Source Location: 8500 West 68th Street, Argo, Cook  
Responsible Official: Louis J. Zimmerman, General Manager

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

If you have any questions concerning this permit, please contact Yeric Yarrington at 217/782-2113.

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

DES:YY:jar

cc: Illinois EPA, FOS, Region 1

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

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

GATX Terminals Corporation  
8500 West 68th Street  
Argo, Illinois 60501  
708/496-2862

I.D. No.: 031012AEA  
Standard Industrial Classification: 4226, Public "For Hire" Bulk  
Liquid Storage Terminal

1.2 Owner/Parent Company

GATX Terminals Corporation  
500 West Monroe Street  
Chicago, Illinois 60661

1.3 Operator

GATX Terminals Corporation  
8500 West 68th Street  
Argo, Illinois 60501

Dennis Majerczak/Environmental, Health and Safety Manager  
708/496-2862

1.4 General Source Description

The GATX Terminals Corporation - Argo Terminal is located at 8500 West 68th Street, Argo, Illinois. The source is a bulk storage facility.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
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
ASTM	American Society for Testing and Materials
ATU	Allotment Trading Unit
BAT	Best Available Technology
bbl	barrel
Btu	British thermal unit
°C	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
cm	centimeter
cm <sup>2</sup>	centimeter square
CMS	Continuous Monitoring System
CO	carbon monoxide
CPMS	Continuous Parametric Monitoring System
DSP	distilled spirits processing
EFR	External Floating Roof
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft	foot
g mole	gram mole
gal	gallon
HAP	Hazardous Air Pollutant
hr	hour
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IAC	Illinois Administrative Code
IFR	Internal Floating Roof
Illinois EPA	Illinois Environmental Protection Agency
K	Kelvin
kcal	kilocalorie
kg	kilograms
kPa	kilopascal
kW	kilowatts
l	liter
LAER	Lowest Achievable Emission Rate
lb	pound

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m	meter
m <sup>3</sup>	meters cubed
MACT	Maximum Achievable Control Technology
mg	milligram
MJ	megajoule
mmHg	millimeters mercury
mmBtu	Million British thermal units
mo	month
MW	molecular weight
MW	megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
OSHA	U.S. Occupational Safety and Health Administration
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psi	pounds per square inch
psia	pounds per square inch, absolute
RMP	Risk Management Plan
scf	standard cubic foot
scm	standard cubic meter
sec	second
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
T	ton
T1	Title I - identifies Title I conditions that have been carried over from an existing construction 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 construction permit and subsequently revised in this permit
UCC	Union Carbide Corporation
USEPA	United States Environmental Protection Agency
VAS	Vapor Assist System
VCS	Vapor Collection System
VCU	Vapor Combustor Unit
VOC	volatile organic compound
VOL	volatile organic liquid
VOM	Volatile Organic Material

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vp	vapor pressure
VPL	volatile petroleum liquid
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

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

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

Gasoline Dispensing Unit  
Oil/Water Separator  
Use of Portable Tote Tanks

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

None

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

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

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)].

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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 less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

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

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

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

### 3.2 Compliance with Applicable Requirements

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

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

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the

emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

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

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
See Attachment 1	Storage Tanks not Subject to NSPS and not Storing Gasoline Products	See Attachment 1	See Attachment 1
See Attachment 1	Storage Tanks Subject to NSPS and not Storing Gasoline Products	See Attachment 1	See Attachment 1
See Attachment 1	Storage Tanks Subject to NSPS and Storing Gasoline Products	See Attachment 1	See Attachment 1
Docks 1, 2, and 3	Marine Loadout		None
Loading Racks	Railcar and Tank Truck Loading/Unloading	See Attachment 1	VAS, Tank Accumulator, VCU, and/or Scrubbers, and/or None
Equipment Leaks	Fugitive VOM Emissions	-	-
3 Natural Gas Fired Boilers	100, 30.7, and 10.3 mmBtu/Hr	1983, 1990, 1978	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

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.

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

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

- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 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.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatiles Organic Material (VOM)	327.60
Sulfur Dioxide (SO <sub>2</sub> )	0.21
Particulate Matter (PM)	4.13
Nitrogen Oxides (NO <sub>x</sub> )	95.64
HAP, not included in VOM or PM	11.23
TOTAL	438.81

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

The source shall not exceed the following limitations:

- a. i. For storage tanks 25-1, 25-4, 25-6, UC-1 through UC-32, UC-101, UC-102, UC TOTE-1 through 5, UC TOTE-6 A and B, UC TOTE-7, UC TOTE-8 A through D, blending kettles K-250 and K-500, and UCC loading and unloading operations, but not including fugitive equipment leaks, drip pan losses, etc.:

<u>Pollutant</u>	<u>Throughput (gal/yr)</u>	<u>Emissions (T/yr)</u>
VOM	65,847,940	4.40

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No material shall be stored in these tanks, except as specified in Conditions 7.1.6(a) and 7.2.6(b), with a vapor pressure greater than 1.0 psia at 70°F.

Any tank storing butyl acetate, butyl alcohol, ethyl acetate, isobutyl acetate, isobutyl alcohol, isopropyl acetate, methyl carbinol, methyl isobutyl ketone, methyl proposal acetate, primary amyl acetate, n-propyl acetate, n-propyl alcohol, or vinyl acetate shall vent all emissions through the VCU.

- ii. For UCC DSP operations including blending kettles K-250, K-500, UC TOTE-1 through 5, UC TOTE-6 A and B, UC TOTE-7, and UC TOTE-8 A through D:

<u>Pollutant</u>	Throughput (gal of ethyl <u>alcohol/yr</u> )	Emissions (T/yr)
VOM	13,240,420	1.12

- iii. The limits in Conditions 5.5.3(a)(i) and (ii) are limitations established in Permit 92020053, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [T1].

- b. i. For storage tanks E-13, E-16, E-17, E-18, E-21, E-22, E-25, E-26, E-28, and E-29:

VOM Emissions	
<u>(T/mo)</u>	<u>(T/yr)</u>
0.1	0.9

- ii. For storage tanks E-10, E-11, E-12, E-14, E-15, E-19, E-20, E-23, E-24, E-27, E-30 through E-45, E-47, E-48, and E-49:

VOM Emissions	
<u>(T/mo)</u>	<u>(T/yr)</u>
0.3	2.6

iii. The limits in Conditions 5.5.3(b)(i) and (ii) are limitations established in Permit 99060010, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [T1].

c. For Conditions 5.5.3(a) and (b), compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

## 5.6 General Recordkeeping Requirements

### 5.6.1 Emission Records

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

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

### 5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in

response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

## 6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

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

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

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

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

## 6.2 Applicability

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

## 6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
  - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for

such major modification or applicable provisions in Section 7.0 of this permit.

#### 6.4 Market Transaction

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

#### 6.5 Emission Excursion Compensation

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

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

the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

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

#### 6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

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

#### 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This

report shall include the following information [35 IAC 205.300]:

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

#### 6.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 730 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 82.1855 tons.

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- A. This determination includes the use of estimated 1995 and submitted 1996 emissions as baseline seasons.
  - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
  - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
  - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units
- Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
  - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

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

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reductions requirements specified in IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:
  1. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
  2. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
  3. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

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Tanks UC-1, 4, 5, 8, 11, 12, 16, 17, 18, 19, 20, 22, 24,  
26, 28, 101, 102

Tanks 25-17, 48-1, 55-6, 55-10 in gasoline service

Boilers and space heaters

- b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reductions requirements specified in IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

Tank rail car and tank truck for tank UC-30

Tank truck loadout for tanks 25-18 and 55-8

7.0 UNIT SPECIFIC CONDITIONS

7.1 Storage Tanks not subject to NSPS and not storing gasoline products

7.1.1 Description

Tanks that store acrylates, petroleum, chemical, and food grade products.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
See Attachment 1	See Attachment 1	See Attachment 1

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected tanks" for the purpose of these unit-specific conditions, are storage tanks that were constructed or modified prior to June 11, 1973 or have a capacity less than 10,567 gallons (40 m<sup>3</sup>). These affected tanks are subject to 35 IAC 218 Subpart B.

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

- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.1.5(c) and the following exception: If no odor nuisance exists the limitation of this condition shall apply only to photochemically reactive material. [35 IAC 218.301]

7.1.4 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 Vessels, 40 CFR 60, Subpart K, Ka, or Kb, because the affected tanks were constructed or last modified before June 11, 1973 or the affected tanks have a capacity less than 10,567 gallons (40 m<sup>3</sup>).

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- b. This permit is issued based on the affected tanks that have a capacity less than 40,000 gallons not being subject to the limitations of 35 IAC 218.120.
- c. This permit is issued based on the affected tanks that have a capacity of 40,000 gallons or greater not being subject to the limitations of 35 IAC 218.120, because the contents of these affected tanks have a maximum true vapor pressure less than 0.75 psia.
- d. This permit is issued based on the affected tanks not being subject to 35 IAC 218.121 or 218.123, because the contents of these affected tanks are not petroleum liquids.
- e. This permit is issued based on the affected tanks not being subject to 35 IAC Part 218 Subparts TT and UU, because storage tanks are exempted from the requirements of these subparts per 35 IAC 218.980(a)(2) and (b)(2).

7.1.5 Control Requirements

- a. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108, or unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as described in 35 IAC 218.121(b)(2). [35 IAC 218.122(b)]
- b. Exception: If no odor nuisance exists the limitations of Condition (a) above shall only apply to the loading of VOL with a vapor pressure of 2.5 psia or greater at 70°F. [35 IAC 218.122(c)]
- c. Emissions of organic material in excess of those permitted by Condition 7.1.3(b) are allowable if such emissions are controlled by one of the following methods: [35 IAC 218.302]

- i. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; or,
- ii. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere; or,
- iii. Any other air pollution control equipment approved by the Illinois EPA and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

7.1.6 Emission Limitations

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

- a. Storage tank UC-101 shall not exceed the following limits:

<u>Material Stored</u>	<u>Throughput (gal/yr)</u>	<u>VOM Emissions (lb/yr)</u>
Methyl Alcohol	206,880	378

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

The above limitations were established in Construction Permit 92020053, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modifications addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

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- b. The affected tanks shall not exceed the following limits:

<u>Tank</u>	<u>Throughput (bbl/yr)</u>	<u>VOM Emissions (lb/yr)</u>
25-18	200,000	9,140
55-8	1,150,000	3,000
80-1	320,000	2,810

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

The above limitations were established in Construction Permit 96080122, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modifications addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- c. Upon completion of an IFR, the affected tank 25-9 shall not exceed the following limits:

<u>Vapor Pressure at 75°F (psia)</u>	<u>Throughput (gal/yr)</u>	<u>VOM Emissions (T/yr)</u>
1.99	5,250,000	2.61

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

The above limitations were established in Construction Permit 99060041, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modifications addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

#### 7.1.7 Testing Requirements

Any control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified below:

- a. 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, incorporated by reference in 35 IAC 218.112 as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 min, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times.
- b. 40 CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D, incorporated by reference in 35 IAC 218.112, shall be used for velocity and volumetric flow rates.

#### 7.1.8 Monitoring Requirements

- a. Available data on the storage temperature may be used to determine the maximum true vapor pressure. [35 IAC 218.128(b)]
  - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  - ii. For other liquids, the vapor pressure:
    - A. Determined by ASTM Method D2879-83, incorporated by reference at 35 IAC 218.112(a)(1);

- B. Measured by an appropriate method approved by the Illinois EPA and USEPA; or
  - C. Calculated by an appropriate method approved by the Illinois EPA and USEPA.
- b. The owner or operator of each vessel of 40,000 gallon capacity or greater storing a mixture of indeterminate or variable composition with a maximum true vapor pressure of 0.5 psia or greater shall be subject to the following [35 IAC 218.128(c)]:
- i. Prior to the initial filling of the vessel, the maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in Condition 7.1.8(a).
  - ii. For vessels in which the vapor pressure of the anticipated liquid composition is 0.5 psia or greater but less than 0.75 psia, an initial physical test of the vapor pressure is required; a physical test at least once every 6 months thereafter is required as determined by the following methods:
    - A. ASTM Method D2879-83, incorporated by reference at 35 IAC 218.112(a)(1);
    - B. ASTM Method D323-82, incorporated by reference at 35 IAC 218.112(a)(25); or
    - C. As measured by an appropriate method approved by the Illinois EPA.

#### 7.1.9 Recordkeeping Requirements

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

- a. The owner or operator shall maintain readily accessible records of the dimensions of the storage vessels and an analysis of the capacities of the

storage vessels. These records shall be kept for the life of the source. [35 IAC 218.129(f)]

- b. Except as provided in Section 7.1.8(b), the owner or operator of each affected storage tank of 40,000 gallon capacity or greater storing a liquid with a true vapor pressure greater than or equal to 0.5 psia shall maintain a record of the VOL storage, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for each of the storage tanks. [35 IAC 218.129(g)]
- c. Throughput (gal/mo and gal/yr) and physical properties of each VOL stored in each tank.

#### 7.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected tank with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- b. The owner or operator of each storage vessel with a design capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia shall notify the Illinois EPA within 30 days when the maximum true vapor pressure of the liquid exceeds 0.75 psia. [35 IAC 218.128(a)]

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

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

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

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#### 7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from each affected tank, the equations in AP-42 Volume I, Chapter 7, "Liquid Storage Tanks", September, 1997, is acceptable.

7.2 Storage Tanks subject to NSPS and not storing gasoline products

7.2.1 Description

Tanks that store benzene containing, petroleum, chemical, and food grade products.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
See Attachment 1	See Attachment 1	See Attachment 1

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected tank" for the purpose of these unit-specific conditions is a storage tank that is subject to 40 CFR 60 Subpart Kb. A storage tank is subject to 40 CFR 60 Subpart Kb if it was constructed, reconstructed, or modified after July 23, 1984 and if it has a capacity greater than or equal to 40 m<sup>3</sup> (10,567 gallons) that is used to store volatile organic liquids (VOLs).

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

- b. The affected tanks are subject to 35 IAC Part 218 Subpart B.
- c. The affected tanks subject to and complying with 40 CFR 60 Subpart Kb are hereby shielded from compliance with 35 IAC 218 Subpart B (except 35 IAC 218.122). This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR 60, Subpart Kb assures compliance with 35 IAC 218 Subpart B.
- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.2.5(f) and the following exception: If no odor nuisance exists the limitation of this condition shall apply only to photochemically reactive material. [35 IAC 218.301]

e. Malfunction and Breakdown Provisions

- i. Operation in excess of the applicable standards during malfunction and breakdown is allowed. In the event that an IFR Tank becomes defective requiring product liquid transfer, the Permittee is allowed to transfer the contents to a tank which is not equipped with an IFR for a period not to exceed 45 days. In the event that the VCU should malfunction or breakdown the Permittee is allowed to continue to operate for a period not to exceed 5 days.
- ii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.2.9(f) and 7.2.10(f).

7.2.4 Non-Applicability of Regulations of Concern

- a. Except as specified in Condition 7.2.9 (a), storage vessels with design capacity less than 75 m<sup>3</sup> (19,813 gal) are exempt from 40 CFR 60 Subpart A and from the provisions of 40 CFR 60 Subpart Kb.
- b. Except as specified in Condition 7.2.9 (a), storage vessels either with a capacity greater than or equal to 151 m<sup>3</sup> (39,890 gal) storing a liquid with a maximum true vapor pressure less than 3.5 kPa (0.51 psia) or with a capacity greater than or equal to 75 m<sup>3</sup> (19,813 gal) but less than 151 m<sup>3</sup> (39,890 gal) storing a liquid with a maximum true vapor pressure less than 15.0 kPa (2.18 psia) are exempt from 40 CFR 60 Subpart A and from the provisions of 40 CFR 60 Subpart Kb.
- c. This permit is issued based on the affected tanks not being subject to 40 CFR 61 Subpart Y, because the contents of these affected tanks are not industrial grade or refined benzene.
- d. This permit is issued based on the affected tanks not being subject to 35 IAC 218.121 or 218.123, because the contents of these affected tanks are not petroleum liquids as defined by 35 IAC 211.4610.

- e. This permit is issued based on the affected tanks not being subject to 35 IAC Part 218 Subparts TT and UU, because storage tanks are exempted from the requirements of these subparts per 35 IAC 218.980(a)(2) and (b)(2).

#### 7.2.5 Control Requirements

- a. The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> (40,000 gal) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.1 psia) or with a design capacity greater than or equal to 75 m<sup>3</sup> (19,813 gal) but less than 151 m<sup>3</sup> (40,000 gal) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa (4.00 psia) but less than 76.6 kPa (11.1 psia) shall equip each storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications [40 CFR 60.112b(a)(1)]:
  - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and 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.
  - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
    - A. A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the

storage vessel and the floating roof continuously around the circumference of the tank.

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

- 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.
  - 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.
  - viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
  - ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- b. The owner or operator of each storage vessel with a design capacity equal to or greater than 151 m<sup>3</sup> (39,890 gal) which contains VOL that, as stored, has a maximum true vapor pressure greater than or equal to 76.6 kPa (11.1 psia) shall equip each storage vessel with a closed vent system and control device as specified below: [40 CFR 112b(b)(1)]
- i. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined by the methods specified in 40 CFR 60.485(b).
  - ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements of 40 CFR 60.18, as specified in Condition 7.2.5(c) below.

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- c. i. Flares shall be designed for and operated with no visible emissions as determined by the methods specified in Condition 7.2.7(b), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
  - ii. Flares shall be operated with a flame present at all times, as determined by the methods specified in Condition 7.2.7(b).
  - iii. An owner/operator has the choice of adhering to either the heat content specifications in Condition 7.2.5(c)(iii)(B) and the maximum tip velocity specifications in Condition 7.2.5(c)(iv), or adhering to the requirements in Condition 7.2.5(c)(iii)(A).
- A. 1. Flares shall be used that have a diameter of 3 inches or greater, are nonassisted, have a hydrogen content of 8.0 percent (by volume), or greater, and are designed for and operated with an exit velocity less than 37.2 m/sec (122 ft/sec) and less than the velocity,  $V_{max}$ , as determined by the following equation:

$$V_{max} = (X_{H2} - K_1) \times K_2$$

Where:

$V_{max}$  = Maximum Permitted Velocity,  
m/sec.

$K_1$  = Constant, 6.0 Volume-Percent  
Hydrogen

$K_2$  = Constant, 3.9(m/sec)/Volume-  
Percent Hydrogen

$X_{H2}$  = The Volume-Percent of  
Hydrogen, on a Wetbasis, as  
calculated by using the  
American Society for Testing  
and Materials (ASTM) Method

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2. The actual exit velocity of a flare shall be determined by the method specified in Condition 7.2.7(b)(ii)(D).
  - B. Flares shall be used only with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or with the net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater if the flare is nonassisted. The net heating value of the gas being combusted shall be determined by the methods specified in Condition 7.2.7(b)(ii)(C).
    - iv.
      - A. Steam-assisted and nonassisted flares shall be designed for and operated with an exit velocity, as determined by the methods specified in Condition 7.2.7(b)(iv), less than 18.3 m/sec (60 ft/sec), except as provided in Conditions 7.2.5(c)(iv)(B) and (C).
        - B. Steam-assisted and nonassisted flares designed for and operated with an exit velocity, as determined by the methods specified in Condition 7.2.7(b)(iv), equal to or greater than 18.3 m/sec (60 ft/sec) but less than 122 m/sec (400 ft/sec) are allowed if the net heating value of the gas being combusted is greater than 37.3 MJ/scm (1,000 Btu/scf).
        - C. Steam-assisted and nonassisted flares designed for and operated with an exit velocity, as determined by the methods specified in Condition 7.2.7(b)(ii)(D), less than the velocity,  $V_{max}$ , as determined by the method specified in Condition

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7.2.7(b)(ii)(E), and less than 122 m/sec  
(400 ft/sec) are allowed.

- v. Air-assisted flares shall be designed and operated with an exit velocity less than the velocity,  $V_{\max}$ , as determined by the method specified in Condition 7.2.7(b)(ii)(F).
  - vi. Flares used to comply with this Condition shall be steam-assisted, air-assisted, or nonassisted.
- d. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108, or unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as described in 35 IAC 218.121(b)(2). [35 IAC 218.122(b)]
- e. Exception: If no odor nuisance exists the limitations of Condition 7.2.5(d) shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3K (70°F). [35 IAC 218.122(c)]
- f. Emissions of organic material in excess of those permitted by Condition 7.2.3(d) are allowable if such emissions are controlled by one of the following methods: [35 IAC 218.302]
- i. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; or,
  - ii. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere; or,

- iii. Any other air pollution control equipment approved by the Illinois EPA and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

7.2.6 Emission Limitations

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

- a. i. Throughput for storage tanks 25-1, 25-4, and 25-6 shall not exceed 24,250,000 gal/yr.
- ii. The affected tanks shall not exceed the following limits:

<u>Tank</u>	<u>Material Stored</u>	<u>Throughput (gal/yr)</u>	<u>VOM Emissions (lb/yr)</u>
UC-12	Ethyl Acetate	1,850,000	1,190
UC-24	Vinyl Acetate	3,244,000	1,914

- iii. Storage tanks UC-33, UC-34, UC-37, and UC-38 shall not exceed the following limits:

<u>Max. Vapor Pressure (psia)</u>	<u>Throughput (gal/yr)</u>	<u>VOM Emissions (lb/mo)</u>	<u>(T/yr)</u>
0.0002	5,166,110	167	1.00

- iv. For Conditions 7.2.6(a)(i), (ii), and (iii) above, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

- v. The above limitations were established in Construction Permits 92020053, for Conditions 7.2.6(a) and (b), and 96030311, for Condition 7.2.6(c), pursuant to 35 IAC Part 203. These

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limits ensure that the construction and/or modifications addressed in the aforementioned Construction Permits do not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- b. The affected tanks shall not exceed the following limits:

<u>Tank</u>	<u>VOM Emissions (lb/yr)</u>	
<u>Tank</u>	<u>Tank</u>	<u>Loadout</u>
3-2	530	877
4-2	600	1,454
10-4	277	474
10-18	1,820	3,030
15-2	122	314
20-2	3,800	805
25-2	260	114
25-3	2,460	1,510
25-7	2,770	6,670
80-2	2,810	----

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1R].

The above limitations contain revisions to previously issued Permit 96080122. 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

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CAAPP application contains the most current and accurate information for the source. Specifically, throughput, molecular weight, and vapor pressure requirements were removed without changing the emission limits [T1R].

- c. The affected tanks shall not exceed the following limits:

<u>Tank</u>	<u>VOM Emissions</u>	
	<u>(lb/hr)</u>	<u>(T/yr)</u>
5010	0.11	0.35
5011	0.21	0.61
5012	0.05	0.15
5013	0.02	0.06

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1R].

The above limitations contain revisions to previously issued Permit 92110037. 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, throughput and vapor pressure requirements were removed without changing the emission limits [T1R].

- d. The affected tanks shall not exceed the following limits:

<u>Tank</u>	<u>VOM Emissions (T/yr)</u>
80-5	3.3
80-6	2.4

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1R].

The above limitations contain revisions to previously issued Permits 92020085 and 99030037. 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, throughput and vapor pressure requirements were removed without changing the emission limits [T1R].

#### 7.2.7 Testing Requirements

- a. After installing the control equipment required to meet Condition 7.2.5(a) (permanently affixed roof and internal floating roof), each owner or operator shall:  
[40 CFR 60.113b(a)]
  - 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.

- 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 there is liquid accumulated on the roof, or the seal is detached, or 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 paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Illinois EPA in the inspection report required in Condition 7.2.10(c)(ii). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- iii. For vessels equipped with a double-seal system as specified in Condition 7.2.5(a)(ii)(B):
  - A. Visually inspect the vessel as specified in Condition 7.2.7(a)(iv) at least every 5 years; or
  - B. Visually inspect the vessel as specified in Condition 7.2.7(a)(ii).
- iv. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and

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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 the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or 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 paragraph 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 conducting the annual visual inspection as specified in Conditions 7.2.7(a)(ii) and (iii)(B) and at intervals no greater than 5 years in the case of vessels specified in Condition 7.2.7(a)(iii)(A).

- b. The owner or operator of each source that is equipped with a closed vent system and a flare to meet the requirements in Condition 7.2.5(b) and (c) shall meet the requirements specified in the general control device requirements of 40 CFR 60.18(e) and (f), as specified below. [40 CFR 60.113b(d)]
  - i. Flares used to comply with provisions of Condition 7.2 shall be operated at all times when emissions may be vented to them.
  - ii.
    - A. Reference Method 22 shall be used to determine the compliance of flares with the visible emission provisions of Condition 7.2.5(c). The observation period is 2 hours and shall be used according to Method 22.
    - B. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.

- C. The net heating value of the gas being combusted in a flare shall be calculated using the following equation:

$$H_T = K \sum_{i=1}^n C_i H_i$$

Where:

$H_T$  = Net heating value of the sample, MJ/scm; where the net enthalpy per mole of offgas is based on combustion at 25°C and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20°C;

$C_i$  = Concentration of sample component  $i$  in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-77 (Incorporated by reference as specified in 40 CFR 60.17); and

$H_i$  = Net heat of combustion of sample component  $i$ , kcal/g mole at 25°C and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 (incorporated by reference as specified in 40 CFR 60.17) if published values are not available or cannot be calculated.

- D. The actual exit velocity of a flare shall be determined by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip.

- E. The maximum permitted velocity,  $V_{max}$ , for flares complying with Condition 7.2.5(c)(iv)(C) shall be determined by the following equation.

$$\text{Log}_{10} (V_{\text{max}}) = (H_T + 28.8) / 31.7$$

$V_{\text{max}}$  = Maximum permitted velocity, M/sec  
28.8 = Constant  
31.7 = Constant  
 $H_T$  = The net heating value as determined  
in Condition 7.2.7(b)(ii)(C).

- F. The maximum permitted velocity,  $V_{\text{max}}$ , for air-assisted flares shall be determined by the following equation.

$$V_{\text{max}} = 8.706 + 0.7084 (H_T)$$

$V_{\text{max}}$  = Maximum permitted velocity, m/sec  
8.706 = Constant  
0.7084 = Constant  
 $H_T$  = The net heating value as determined  
in Condition 7.2.7(b)(ii)(C).

#### 7.2.8 Monitoring Requirements

- a. Available data on the storage temperature may be used to determine the maximum true vapor pressure. [40 CFR 60.116b(e)]
- i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
- ii. For other liquids, the vapor pressure:
- A. May be obtained from standard reference texts;
- B. Determined by ASTM Method D2879-83 (incorporated by reference);

- C. Measured by an appropriate method approved by the Illinois EPA and USEPA; or
  - D. Calculated by an appropriate method approved by the Illinois EPA and USEPA.
- b. The owner or operator of each vessel storing a mixture of indeterminate or variable composition shall be subject to the following [40 CFR 60.116b(f)]:
- i. Prior to the initial filling of the vessel, the maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in subsection b above.
  - ii. For vessels in which the vapor pressure of the anticipated liquid composition is 0.5 psia or greater but less than 0.75 psia, an initial physical test of the vapor pressure is required; a physical test at least once every 6 months thereafter is required as determined by the following methods:
    - A. ASTM Method D2879-83 (incorporated by reference);
    - B. ASTM Method D323-82 (incorporated by reference); or
    - C. As measured by an appropriate method approved by the Illinois EPA and USEPA.
- c. Owners or operators of flares used to comply with the provisions of Condition 7.2 shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs.

#### 7.2.9 Recordkeeping Requirements

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

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- a. The owner or operator shall maintain readily accessible records of the dimensions of the storage vessels and an analysis of the capacities of the storage vessels. These records shall be kept for the life of the source. [40 CFR 60.116b(b)]
- b. Except as provided in Section 7.2.8(b), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> (39,890 gal) storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa (0.51 psia) or with a design capacity greater than or equal to 75 m<sup>3</sup> (19,813 gal) but less than 151 m<sup>3</sup> (39,890 gal) storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa (2.18 psia) shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period. Each vessel equipped with a closed vent system and control device meeting the specifications of Condition 7.2.5(b) is exempt from this condition. [40 CFR 60.116b(c) and (g)]
- c. After installing the control equipment in accordance with Condition 7.2.5(a) (fixed roof and internal floating roof), the owner or operator shall keep a record of each inspection performed as required by Condition 7.2.7(a). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [40 CFR 60.115b(a)(2)]
- d. After installing a closed vent system and flare to comply with Condition 7.2.5(b), the owner or operator shall keep records of all periods of operation during which the flare pilot flame is absent. [40 CFR 60.115b(d)(2)]
- e. Throughput (gal/mo and gal/yr) and physical properties of each VOL stored in each tank.
- f. Records for Malfunctions and Breakdowns of an IFR or VCU.

The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of a tank during malfunctions and breakdown of the control features of the tank or transfer of contents to a tank without an IFR, which as a minimum, shall include:

- i. Date and duration of malfunction or breakdown;
- ii. A detailed explanation of the malfunction or breakdown;
- iii. An explanation why the damaged feature(s) could not be immediately repaired or the contents moved to another IFR tank without risk of injury to personnel or severe damage to equipment;
- iv. The measures used to reduce the quantity of emissions and the duration of the event;
- v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and
- vi. The amount of release above typical emissions during malfunction/breakdown.

#### 7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected tank with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- b. 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 Conditions 7.2.7(a)(i) and (iv) to afford the Illinois EPA the opportunity to have an observer present. If the inspection required by Condition 7.2.7(a)(iv) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Illinois EPA at least 7 days prior to the

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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. [40 CFR 60.113b(a)(5)]

- c. After installing control equipment in accordance with Condition 7.2.5(a) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements.
  - i. Furnish the Illinois EPA with a report that describes the control equipment and certifies that the control equipment meets the specifications of Conditions 7.2.5(a) and 7.2.7(a)(i). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3). [40 CFR 60.115b(a)(1)]
  - ii. If any of the conditions described in Condition 7.2.7(a)(ii) are detected during the annual visual inspection required by Condition 7.2.7(a)(ii), a report shall be furnished to the Illinois EPA within 30 days of the inspection. Each report shall identify 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. [40 CFR 60.115b(a)(3)]
  - iii. After each inspection required by Condition 7.2.7(a)(iii) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 7.2.7(a)(iii)(B), a report shall be furnished to the Illinois EPA within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of Condition 7.2.5(a) or 7.2.7(a)(iii) and list each repair made. [40 CFR 60.115b(a)(4)]

- d. After installing a closed vent system and flare to comply with Condition 7.2.5(b), the owner or operator shall report semiannually all periods recorded under Condition 7.2.9(d) in which the pilot flame was absent. [40 CFR 60.115b(d)(3)]
- e. The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> (39,890 gal) storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa (0.75 psia) or with a design capacity greater than or equal to 75 m<sup>3</sup> (19,813 gal) but less than 151 m<sup>3</sup> (39,890 gal) storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa (4.00 psia) shall notify the Illinois EPA within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. Each vessel equipped with a closed vent system and control device meeting the specifications of Condition 7.2.5(b) is exempt from this condition. [40 CFR 60.116b(d) and (g)]
- f. Reporting of Malfunctions and Breakdowns for an IFR or VCU

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of a tank subject to Condition 7.2.3(e) during malfunction or breakdown of the control features of the tank or transfer of contents to a tank without an IFR.

- i. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.
- ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued

operation of the tank was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when the contents were transferred to an appropriate tank.

- iii. If compliance is not achieved within 5 working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the contents will be transferred to an appropriate tank.

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

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

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

#### 7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

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For the purpose of estimating VOM emissions from each affected tank, the equations in AP-42 Volume I, Chapter 7, "Liquid Storage Tanks", September, 1997, is acceptable.

7.3 Storage Tanks subject to NSPS and storing gasoline products

7.3.1 Description

Tanks that are in gasoline service.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
See Attachment 1	See Attachment 1	See Attachment 1

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected tank" for the purpose of these unit-specific conditions is a storage tank that is subject to the control requirement of 40 CFR 60 Subpart Kb that relies on an internal floating roof for compliance. A storage tank constructed, reconstructed, or modified after July 23, 1984 is subject to the control requirements of 40 CFR 60 Subpart Kb if it has a capacity greater than or equal to 151 m<sup>3</sup> (39,890 gal) which contains a product with vapor pressure greater than or equal to 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.1 psia).

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

- b. The affected tanks are subject to 35 IAC 218.121.
- c. The affected tanks subject to and complying with 40 CFR 60 Subpart Kb are hereby shielded from compliance with 35 IAC 218 Subpart B (except 35 IAC 218.122). This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR 60, Subpart Kb assures compliance with 35 IAC 218 Subpart B.
- d. No person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline whose Reid vapor pressure exceeds the applicable limitations set forth in Conditions 7.3.3(d) and (e) during the regulatory control periods, which shall be May 1 to September 15 for

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retail outlets, wholesale purchaser-consumer operations, and all other operations. [35 IAC 218.585(a)]

- e. The Reid vapor pressure of gasoline, a measure of its volatility, shall not exceed 9.5 psi (65.5 kPa) during the regulatory control period in 1990 and each year thereafter. [35 IAC 218.585(b)]
- f. The Reid vapor pressure of ethanol blend gasoline shall not exceed the limitations for gasoline set forth in Condition 7.3.3(d) by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol blend gasoline 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. [35 IAC 218.585(c)]
- g. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.3.5(c) and the following exception: If no odor nuisance exists the limitation of this condition shall apply only to photochemically reactive material. [35 IAC 218.301]
- h. Malfunction and Breakdown Provisions
  - i. Operation in excess of the applicable standards during malfunction and breakdown is allowed. In the event that an IFR Tank becomes defective requiring product liquid transfer, the Permittee is allowed to transfer the contents to a tank which is not equipped with an IFR for a period not to exceed 45 days.
  - ii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.3.9(e) and 7.3.10(d).

#### 7.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected tanks not being subject to 40 CFR 63 Subpart R because the tanks are subject to more stringent control requirements in the new source performance standards for storage vessels of petroleum liquid, 40 CFR Part 60 Subpart Kb. [40 CFR 63.420(g)]
- b. This permit is issued based on the affected tanks not being subject to the limitations of 35 IAC 218.120 because tanks storing petroleum liquids as defined at 35 IAC 211.4610 are exempted. [35 IAC 218.119(e)]
- c. This permit is issued based on the affected tanks not being subject to 35 IAC 218.123 because the tanks are subject to new source performance standards for storage vessels of petroleum liquid, 40 CFR Part 60 Subpart Kb. [35 IAC 218.123(a)(5)]
- d. This permit is issued based on the affected tanks not being subject to 35 IAC 218.583, except for 35 IAC 218.583(a)(1), because the tanks are fitted with floating roofs. [35 IAC 218.583(b)(1)]
- e. These affected tanks are not subject to the requirements of 35 IAC Part 218 Subparts TT and UU, because the affected tanks are subject to 35 IAC 218 Subpart B. [35 IAC 218.980(a) and (b)]

#### 7.3.5 Control Requirements

- a. The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> (40,000 gallons) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.1 psia) shall equip each storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications [40 CFR 60.112b(a)(1)]:
  - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid

surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and 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.

- ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - A. A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - C. A mechanical shoe seal. A mechanical shoe seal 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 non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

- 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.
- 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.
- 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.
- 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.
- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- b. No person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless the tank is equipped with a submerged loading pipe.  
[35 IAC 218.583(a)(1) and 218.122]
- c. Emissions of organic material in excess of those permitted by Condition 7.3.3(g) are allowable if such

emissions are controlled by one of the following methods: [35 IAC 218.302]

- i. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; or,
- ii. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere; or,
- iii. Any other air pollution control equipment approved by the Illinois EPA and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

7.3.6 Emission Limitations

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

The affected tanks shall not exceed the following limits:

<u>Tank</u>	<u>Throughput (bbl/yr)</u>	<u>VOM Emissions (lb/yr)</u>
25-17	500,000	8,650
48-1	830,000	8,330
55-3	220,000	2,240
55-6	1,300,000	10,475
55-9	1,300,000	10,475
55-10	1,300,000	10,475

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

The above limitations were established in Construction Permit 96080122, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modifications addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

#### 7.3.7 Testing Requirements

After installing the required control equipment (permanently affixed roof and internal floating roof), each owner or operator shall: [40 CFR 60.113b(a)]

- a. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- b. For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or 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 paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Illinois EPA in the inspection report required in Condition 7.3.10(c)(ii). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

- c. For vessels equipped with a double-seal system as specified in Condition 7.3.5(a)(ii)(B):
  - i. Visually inspect the vessel as specified in Condition 7.3.7(d) at least every 5 years; or
  - ii. Visually inspect the vessel as specified in Condition 7.3.7(b).
- d. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or 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 paragraph 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 conducting the annual visual inspection as specified in Conditions 7.3.7(b) and (c)(ii) and at intervals no greater than 5 years in the case of vessels specified in Condition 7.3.7(c)(i) of this section.

#### 7.3.8 Monitoring Requirements

- a. Available data on the storage temperature may be used to determine the maximum true vapor pressure. [40 CFR 60.116b(e)]
  - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local

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monthly average ambient temperature as reported by the National Weather Service.

- ii. For other liquids, the vapor pressure:
  - A. May be obtained from standard reference texts;
  - B. Determined by ASTM Method D2879-83, incorporated by reference at 35 IAC 218.112(a)(1);
  - C. Measured by an appropriate method approved by the Illinois EPA and USEPA; or
  - D. Calculated by an appropriate method approved by the Illinois EPA and USEPA.
  
- b. The owner or operator of each vessel storing a mixture of indeterminate or variable composition shall be subject to the following [40 CFR 60.116b(f)]:
  - i. Prior to the initial filling of the vessel, the maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in subsection b above.
  
  - ii. For vessels in which the vapor pressure of the anticipated liquid composition is 0.5 psia or greater but less than 0.75 psia, an initial physical test of the vapor pressure is required; a physical test at least once every 6 months thereafter is required as determined by the following methods:
    - A. ASTM Method D2879-83, incorporated by reference at 35 IAC 218.112(a)(1);
    - B. ASTM Method D323-82, incorporated by reference at 35 IAC 218.112(a)(25); or
    - C. As measured by an appropriate method approved by the Illinois EPA and USEPA.

- c. All sampling of gasoline required pursuant to the provisions of 35 IAC 218.585 shall be conducted by one or more of the following approved methods or procedures which are incorporated by reference in 35 IAC 215.105. [35 IAC 218.585(d)]
  - i. For manual sampling, ASTM D4057;
  - ii. For automatic sampling, ASTM D4177;
  - iii. Sampling procedures for Fuel Volatility, 40 CFR 80 Appendix D.
- d. The Reid vapor pressure of gasoline shall be measured in accordance with either test method ASTM D323 or a modification of ASTM D323 known as the "dry method" as set forth in 40 CFR 80, Appendix E, incorporated by reference in 35 IAC 218.112. For gasoline-oxygenate blends which contain water-extractable oxygenates, the Reid vapor pressure shall be measured using the dry method test. [35 IAC 218.585(e)]
- e. The ethanol content of ethanol blend gasoline shall be determined by use of one of the approved testing methodologies specified in 40 CFR 80, Appendix F, incorporated by reference in 35 IAC 218.112. [35 IAC 218.585(f)]
- f. Any alternate to the sampling or testing methods or procedures contained in Conditions 7.3.8(c), (d), and (e) must be approved by the Illinois EPA, which shall consider data comparing the performance of the proposed alternative to the performance of one or more approved test methods or procedures. Such data shall accompany any request for Illinois EPA approval of any alternate test procedure. If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test methods or procedures, the Illinois EPA shall approve the proposed alternative. [35 IAC 218.585(g)]

#### 7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items

for each affected tank to demonstrate compliance with Conditions 5.5.1 and 7.3.3, pursuant to Section 39.5(7)(b) of the Act:

- a. The owner or operator shall maintain readily accessible records of the dimensions of the storage vessels and an analysis of the capacities of the storage vessels. These records shall be kept for the life of the source. [40 CFR 60.116b(b)]
- b. Except as provided in Section 7.3.8(b), the owner or operator shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for each of the storage tanks. [40 CFR 60.116b(c)]
- c. Throughput (gal/mo and gal/yr) and physical properties of each VOL stored in each tank.
- d. After installing the required control equipment (fixed roof and internal floating roof), the owner or operator shall keep a record of each inspection performed as required by Condition 7.3.7. 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). [40 CFR 60.115b(a)(2)]
- e. Records for Malfunctions and Breakdowns of an IFR

The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of a tank during malfunctions and breakdown of the control features of the tank or transfer of contents to a tank without an IFR, which as a minimum, shall include:

- i. Date and duration of malfunction or breakdown;
- ii. A detailed explanation of the malfunction or breakdown;
- iii. An explanation why the damaged feature(s) could not be immediately repaired or the

contents moved to another IFR tank without risk of injury to personnel or severe damage to equipment;

- iv. The measures used to reduce the quantity of emissions and the duration of the event;
- v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and
- vi. The amount of release above typical emissions during malfunction/breakdown.

#### 7.3.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected tank with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- b. 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 Conditions 7.3.7(a) and (d) to afford the Illinois EPA the opportunity to have an observer present. If the inspection required by Condition 7.3.7(d) is not planned and the owner or operator could not have known about the inspection 30 days in advance or 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. [40 CFR 60.113b(a)(5)]
- c. After installing the required control equipment (fixed roof and internal floating roof), the owner or operator shall meet the following requirements.

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- i. Furnish the Illinois EPA with a report that describes the control equipment and certifies that the control equipment meets the specifications of Conditions 7.3.5(a) and 7.3.7(a). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3). [40 CFR 60.115b(a)(1)]
  - ii. If any of the conditions described in Condition 7.3.7(b) are detected during the annual visual inspection required by Condition 7.3.7(b), a report shall be furnished to the Illinois EPA within 30 days of the inspection. Each report shall identify 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. [40 CFR 60.115b(a)(3)]
  - iii. After each inspection required by Condition 7.3.7(c) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 7.3.7(c)(ii), a report shall be furnished to the Illinois EPA within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of Condition 7.3.5(a) or 7.3.7(c) and list each repair made. [40 CFR 60.115b(a)(4)]
- d. Reporting of Malfunctions and Breakdowns for an IFR

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of a tank subject to Condition 7.3.3(h) during malfunction or breakdown of the control features of the tank or transfer of contents to a tank without an IFR.

- i. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence

of noncompliance due to malfunction or  
breakdown.

- ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the tank was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when the contents were transferred to an appropriate tank.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

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

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

#### 7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from each affected tank, the equations in AP-42 Volume I, Chapter 7, "Liquid Storage Tanks", September, 1997, is acceptable.

7.4 Marine Loading

7.4.1 Description

Receiving and shipping out of benzene containing products, styrene monomer, gasoline, petroleum and other chemical products.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Docks 1, 2, and 3	Marine Loading	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected marine tank vessel loading operation" for the purpose of these unit-specific conditions, is each emission unit listed in Condition 7.4.2.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.4.5 and the following exception: If no odor nuisance exists the limitation of this condition shall apply only to photochemically reactive material. [35 IAC 218.301]

7.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected marine tank vessel loading operation not being subject to 40 CFR 63 Subpart Y because it is an existing source that does not have emissions of 10 or 25 tons, as that term is defined in 40 CFR 63.561, and does not have throughput of 10 M barrels or 200 M barrels, as that term is defined in 40 CFR 63.561.
- b. This permit is issued based on the affected marine tank vessel loading operation not being subject to 35 IAC Part 218 Subpart GG because the affected marine tank vessel loading operation is not permitted to load gasoline or crude oil.
- c. This permit is issued based on the affected marine tank vessel loading operation not being subject to the

National Emission Standard for Benzene Emissions from Benzene Transfer Operations in 40 CFR 61 Subpart BB, except for the recordkeeping and reporting requirements in Condition 7.4.9(a), because the benzene containing products at the facility contain less than 70 percent by weight of benzene. [40 CFR 61.300(b)]

- d. This permit is issued based on the affected marine tank vessel loading operation not being subject to the National Emission Standard for Benzene Waste Operations in 40 CFR 61 Subpart FF, because the facility is not a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery. [40 CFR 61.340(a)]
- e. This permit is issued based on the affected marine tank vessel loading operation not being subject to 35 IAC Part 218 Subparts TT and UU, because barge loading facilities are exempted from the control requirements in these subparts.

#### 7.4.5 Control Requirements

Emissions of organic material in excess of those permitted by Condition 7.4.3(b) are allowable if such emissions are controlled by one of the following methods: [35 IAC 218.302]

- a. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; or,
- b. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere; or,
- c. Any other air pollution control equipment approved by the Illinois EPA and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

7.4.6 Emission Limitations

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

None

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

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

- a. Each owner or operator of an affected source complying with Condition 7.4.4(c) shall record the following information. The first year after promulgation the owner or operator shall submit a report containing the requested information to the Director of the Emission Standards Division, (MD-13), U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711. After the first year, the owner or operator shall continue to record; however, no reporting is required. The information shall be made available if requested. The information shall include, as a minimum: [40 CFR 61.305(i)]
  - i. The affected source's name and address;
  - ii. The weight percent of the benzene loaded;
  - iii. The type of vessel loaded (i.e., tank truck, railcar, or marine vessel); and
  - iv. The annual amount of benzene loaded into each type of vessel.

- b. Throughput (gal/mo and gal/yr) and physical properties of each VOL transferred through each dock.

#### 7.4.10 Reporting Requirements

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

#### 7.4.11 Operational Flexibility/Anticipated Operating Scenarios

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

Changes in the material transferred through the marine loading operations, provided the marine loading operations continue to comply with the conditions of this permit.

#### 7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

For the purpose of estimating VOM emissions from the affected marine tank vessel loading operation, the following formula should be used:

$$LL = (12.46 \times S \times PVA \times MW/T) \times (Q_{out}/10^3) \times (100\% - \%CE)/2000$$

Where:

LL = Loading Losses, T/yr

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S = Saturation Factor, 0.50 for Submerged Loading  
of Barges

PVA = True Vapor Pressure of Liquid Loaded, psia

MW = Molecular Weight of Vapors, lb/lb-mole

T = Temperature of Bulk Liquid Loaded, °R (°F +  
460)

Q<sub>out</sub> = Amount of Liquid Loaded, gal/yr

% CE = Destruction Efficiency of Control Device, %

This is the formula for emissions from loading  
petroleum liquids, Section 5.2, AP-42, Fifth Edition,  
January 1995.

7.5 Railcar and Tank Truck Loading/Unloading

7.5.1 Description

Receiving and shipping out of acrylates, gasoline, petroleum, chemical, and food grade products.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Gasoline Rack	Loading/Unloading Racks	VCU (Flare)
Racks 31 and 44	Loading/Unloading Racks	Scrubbers #1 and #2 (Only When Loading/Unloading Acrylates)
Union Carbide Loading Rack	Loading/Unloading Racks	Tank Accumulator and VCU (Flare)
Eastman Chemical Loading Rack	Loading/Unloading Racks	None
Other racks	See Attachment 1	None
Direct load	From Tank to Truck/Rail and Vice Versa	None
Truck to Truck	Loading/Unloading	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. The "affected loading operations" for the purpose of these unit-specific conditions, are loading racks for railcars and tank trucks.

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.5.2.

- b. The "affected gasoline loading operations" for the purpose of these unit-specific conditions, are loading racks which deliver liquid product into gasoline tank trucks and were constructed or modified after December 17, 1980 are subject to 40 CFR 60 Subpart XX.
- c. The affected gasoline loading operations are subject to 35 IAC 218.582.

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- d. The affected gasoline loading operations subject to and complying with 40 CFR 60 Subpart XX are hereby shielded from compliance with 35 IAC 218.582, except as specified in Condition 7.5.5(i). This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR 60 Subpart XX assures compliance with 35 IAC 218.582.
- e. No person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline whose Reid vapor pressure exceeds the applicable limitations set forth in Conditions 7.5.3(e) and (f) during the regulatory control periods, which shall be May 1 to September 15 for retail outlets, wholesale purchaser-consumer operations, and all other operations. [35 IAC 218.585(a)]
- f. The Reid vapor pressure of gasoline, a measure of its volatility, shall not exceed 9.5 psi (65.5 kPa) during the regulatory control period in 1990 and each year thereafter. [35 IAC 218.585(b)]
- g. The Reid vapor pressure of ethanol blend gasoline shall not exceed the limitations for gasoline set forth in Condition 7.5.3(e) by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol blend gasoline 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. [35 IAC 218.585(c)]
- h. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.5.5(j) and the following exception: If no odor nuisance exists the limitation of this condition shall apply only to photochemically reactive material. [35 IAC 218.301]
- i. Malfunction and Breakdown Provisions

- i. Operation in excess of the applicable standards during malfunction and breakdown is allowed. In the event that the VCU should malfunction or breakdown the Permittee is allowed to continue to operate for a period not to exceed 5 days.
- ii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.5.9(g) and 7.5.10(b).

7.5.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected gasoline loading operations not being subject to 40 CFR 63 Subpart R because the gasoline loading operations are subject to more stringent control requirements in the new source performance standards for bulk gasoline terminals, 40 CFR Part 60 Subpart XX. [40 CFR 63.420(g)]
- b. This permit is issued based on the affected loading operations not being subject to the National Emission Standard for Benzene Emissions from Benzene Transfer Operations in 40 CFR 61 Subpart BB, except for the recordkeeping and reporting requirements in Condition 7.5.9(g), because the benzene containing products at the source contain less than 70 percent by weight of benzene. [40 CFR 61.300(b)]
- c. This permit is issued based on the affected loading operations not being subject to the National Emission Standard for Benzene Waste Operations in 40 CFR 61 Subpart FF, because the source is not a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery. [40 CFR 61.340(a)]
- d. This permit is issued based on the affected loading operations not being subject to 35 IAC Part 218 Subparts TT and UU, because this category of emission unit is exempted from the requirements of these subparts per 35 IAC 218.980(a)(2) and (b)(2).

7.5.5 Control Requirements

- a. Each affected gasoline loading operation shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. [40 CFR 60.502(a)]
- b. The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded. [40 CFR 60.502(b)]
- c. Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [40 CFR 60.502(d)]
- d. Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [40 CFR 60.502(e)]
  - i. The owner or operator shall obtain the vapor tightness documentation described in Condition 7.5.9(b) for each gasoline tank truck which is to be loaded at the affected source.
  - ii. The owner or operator shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected source.
  - iii. A. The owner or operator shall cross-check each tank identification number obtained in Condition 7.5.5(d)(ii) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:
    - 1. If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then

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the documentation cross-check shall be performed each quarter; or

2. If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.
- B. If either the quarterly or semiannual cross-check provided in Conditions 7.5.5(d)(iii)(A)(1) through (2) reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.
- iv. The terminal owner or operator shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in Condition 7.5.5(d)(iii).
  - v. The terminal owner or operator shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected source until vapor tightness documentation for that tank is obtained.
  - vi. Alternate procedures to those described in Conditions 7.5.5(d)(i) through (v) for limiting gasoline tank truck loading may be used upon application to, and approval by, the Illinois EPA.
- e. The owner or operator shall act to assure that loading of gasoline tank trucks at the affected source are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]
  - f. The owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected source. Examples

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of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [40 CFR 60.502(g)]

- g. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 Pascal (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in Condition 7.5.7(d). [40 CFR 60.502(h)]
- h. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 Pascal (450 mm of water). [40 CFR 60.502(i)]
- i. No person shall cause or allow the transfer of gasoline into any delivery vessel from any bulk gasoline terminal unless:
  - i. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 218.584(b) or (d); or, if the terminal is driver-loaded, the terminal owner or operator shall be deemed to be in compliance with this permit when terminal access authorization is limited to those owners and/or operators of delivery vessels who have provided a current certification as required by 35 IAC 218.584(c)(3). [35 IAC 218.582(a)(5)]
  - ii. There is no liquid drainage from the loading device when it is not in use. [35 IAC 218.582(a)(3)]
  - iii. The terminal vapor collection system and gasoline loading equipment is operated in a manner that prevents avoidable leaks of liquid during loading or unloading operations. [35 IAC 218.582(b)(1)(C)]
- j. Emissions of organic material in excess of those permitted by Condition 7.5.3(h) are allowable if such

emissions are controlled by one of the following methods: [35 IAC 218.302]

- i. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; or,
- ii. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere; or,
- iii. Any other air pollution control equipment approved by the Illinois EPA and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

7.5.6 Emission Limitations

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

- a. Emissions from the Eastman Chemical loading rack shall not exceed the following limits:

VOM Emissions	
<u>(T/mo)</u>	<u>(T/yr)</u>
0.5	5.04

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

The above limitations were established in Permit 99060010, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification

pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- b. Emissions from the gasoline loading rack and VCU shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(lbs/hr)</u>	<u>(T/yr)</u>
CO	22.5	98.6
NO <sub>x</sub>	5.0	220
VOM	---	8.1

Throughput for the gasoline loading rack shall not exceed 500,000 barrels/month and 6,580,000 barrels/year.

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

The above limitations were established in Permit 96080122, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

#### 7.5.7 Testing Requirements

- a. In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in 40 CFR 60 appendix A or other methods and procedures as specified in this condition, except as provided in 40 CFR 60.8(b). The three-run requirement of 40 CFR 60.8(f) does not apply to this equipment. [40 CFR 60.503(a)]
- b. Immediately before the performance test required to determine compliance with Condition 7.5.5(b) and (g), the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a

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gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test. [40 CFR 60.503(b)]

- c. The owner or operator shall determine compliance with the standards in Condition 7.5.5(b) as follows: [40 CFR 60.503(c)]
  - i. The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.
  - ii. If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.
  - iii. The emission rate (E) of total organic compounds shall be computed using the following equation:

$$E = K \sum_{i=1}^n (V_{esi}C_{ei}) / (L10^6)$$

Where:

E = Emission rate of total organic compounds, mg/liter of gasoline loaded.

V<sub>esi</sub> = Volume of air-vapor mixture exhausted at each interval "i", scm.

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$C_{ei}$  = Concentration of total organic compounds at each interval "i", ppm.

L = Total volume of gasoline loaded, liters.

n = Number of testing intervals.

i = Emission testing interval of 5 minutes.

K = Density of calibration gas,  $1.83 \times 10^6$  for propane and  $2.41 \times 10^6$  for butane, mg/scm.

- iv. The performance test shall be conducted in intervals of 5 minutes. For each interval "i", readings from each measurement shall be recorded, and the volume exhausted ( $V_{esi}$ ) and the corresponding average total organic compounds concentration ( $C_{ei}$ ) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.
- v. The following methods shall be used to determine the volume ( $V_{esi}$ ) air-vapor mixture exhausted at each interval:
- A. Method 2B shall be used for combustion vapor processing systems.
  - B. Method 2A shall be used for all other vapor processing systems.
- vi. Method 25A or 25B shall be used for determining the total organic compounds concentration ( $C_{ei}$ ) at each interval. The calibration gas shall be either propane or butane. The owner or operator may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Illinois EPA.

- vii. To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.
- d. The owner or operator shall determine compliance with the standard in Condition 7.5.5(g) as follows: [40 CFR 60.503(d)]
  - i. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with  $\pm 2.5$  mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.
  - ii. During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

#### 7.5.8 Monitoring Requirements

- a. Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [40 CFR 60.502(j)]
- b. All sampling of gasoline required pursuant to the provisions of 35 IAC 218.585 shall be conducted by one or more of the following approved methods or

procedures which are incorporated by reference in 35 IAC 215.105. [35 IAC 218.585(d)]

- i. For manual sampling, ASTM D4057;
  - ii. For automatic sampling, ASTM D4177;
  - iii. Sampling procedures for Fuel Volatility, 40 CFR 80 Appendix D.
- c. The Reid vapor pressure of gasoline shall be measured in accordance with either test method ASTM D323 or a modification of ASTM D323 known as the "dry method" as set forth in 40 CFR 80, Appendix E, incorporated by reference in 35 IAC 218.112. For gasoline-oxygenate blends which contain water-extractable oxygenates, the Reid vapor pressure shall be measured using the dry method test. [35 IAC 218.585(e)]
- d. The ethanol content of ethanol blend gasoline shall be determined by use of one of the approved testing methodologies specified in 40 CFR 80, Appendix F, incorporated by reference in 35 IAC 218.112. [35 IAC 218.585(f)]
- e. Any alternate to the sampling or testing methods or procedures contained in Conditions 7.5.8(b), (c), and (d) must be approved by the Illinois EPA, which shall consider data comparing the performance of the proposed alternative to the performance of one or more approved test methods or procedures. Such data shall accompany any request for Illinois EPA approval of any alternate test procedure. If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test methods or procedures, the Illinois EPA shall approve the proposed alternative. [35 IAC 218.585(g)]

#### 7.5.9 Recordkeeping Requirements

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

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- a. The tank truck vapor tightness documentation required under Condition 7.5.5(d)(i) shall be kept on file at the terminal in a permanent form available for inspection. [40 CFR 60.505(a)]
  
- b. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information: [40 CFR 60.505(b)]
  - i. Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.
  - ii. Tank owner and address.
  - iii. Tank identification number.
  - iv. Testing location.
  - v. Date of test.
  - vi. Tester name and signature.
  - vii. Witnessing inspector, if any: Name, signature, and affiliation.
  - viii. Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs).
  
- c. A record of each monthly leak inspection required under Section 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information: [40 CFR 60.505(c)]
  - i. Date of inspection.
  - ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
  - iii. Leak determination method.

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- iv. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
- v. Inspector name and signature.
- d. The terminal owner or operator shall keep documentation of all notifications required under Condition 7.5.5(d)(iv) on file at the terminal for at least 2 years. [40 CFR 60.505(d)]
- e. The owner or operator of an affected facility shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years. [40 CFR 60.505(f)]
- f. Throughput (gal/mo and gal/yr) and physical properties of each VOL transferred through each loading rack.
- g. Records for Malfunctions and Breakdowns of VCU.

The Permittee shall maintain records, pursuant to 35 IAC 210.263, of continued operation of a rack during malfunctions and breakdown of the control features of the rack, which as a minimum, shall include:

- i. Date and duration of malfunction or breakdown;
- ii. A detailed explanation of the malfunction or breakdown;
- iii. An explanation why the damaged feature(s) could not be immediately repaired without risk of injury to personnel or severe damage to equipment;
- iv. The measures used to reduce the quantity of emissions and the duration of the event;
- v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and
- vi. The amount of release above typical emissions during malfunction/breakdown.

7.5.10 Reporting Requirements

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- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of an affected tank with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- b. Reporting and Malfunctions and Breakdowns for VCU

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of a rack subject to Condition 7.2.3(e) during malfunction or breakdown of the control features of the rack.

- i. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.
- ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the rack was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed.
- iii. If compliance is not achieved within 5 working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to

occur with schedule, and the expected date on which repairs will be complete.

#### 7.5.11 Operational Flexibility/Anticipated Operating Scenarios

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

Changes in the material transferred through a loading operation, provided the loading operation continues to comply with the conditions of this permit.

#### 7.5.12 Compliance Procedures

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

For the purpose of estimating VOM emissions from the affected loading operations, the following formula should be used:

$$LL = (12.46 \times S \times PVA \times MW/T) \times (Q_{out}/10^3) \times (100\% - \%CE)/2000$$

Where:

- LL = Loading Losses, T/yr
- S = Saturation factor, 0.50 for submerged loading of barges
- PVA = True vapor pressure of liquid loaded, psia
- MW = Molecular weight of vapors, lb/lb-mole
- T = Temperature of bulk liquid loaded, °R (°F + 460)

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$Q_{out}$  = Amount of liquid loaded, gal/yr

% CE = Destruction efficiency of control device, %

This is the formula for emissions from loading  
petroleum liquids, Section 5.2, AP-42, Fifth Edition,  
January 1995.

7.6 Equipment Leaks

7.6.1 Description

Fugitive emissions from pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Equipment Leaks	Fugitive Emissions	None

7.6.3 Applicability Provisions and Applicable Regulations

- a. The "affected equipment" for the purpose of these unit-specific conditions, are pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, instrumentation systems, and control devices or closed vent systems.
- b. The "affected benzene equipment" for the purpose of these unit-specific conditions, are affected equipment that are intended to operate in benzene service which are subject to 40 CFR 61 Subparts V and J.
- c. The owner or operator has elected to apply 40 CFR 63 Subpart H to all affected benzene equipment intended to operate in organic hazardous air pollutant service 300 hours or more during the calendar year and not in vacuum service in lieu of 40 CFR 61 Subparts V and J as allowed by 40 CFR 63.160(c)(2).

7.6.4 Non-Applicability of Regulations of Concern

None

7.6.5 Control Requirements

- a. Each piece of affected benzene equipment in a process unit to which these conditions apply shall be identified such that it can be distinguished readily

from equipment that is not subject to these conditions. Identification of the equipment does not require physical tagging of the equipment. For example, the equipment may be identified on a plant site plan, in log entries, or by designation of process unit boundaries by some form of weatherproof identification. [40 CFR 63.162(c)]

- b. When each leak is detected as specified in these conditions, the following requirements apply: [40 CFR 63.162(f)]
  - i. A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.
  - ii. The identification on a valve may be removed after it has been monitored as specified in Condition 7.6.5(rr)(iii) and no leak has been detected during the follow-up monitoring. If the owner or operator elects to comply using the provisions of Condition 7.6.5(ttt)(i)(A), the identification on a connector may be removed after it is monitored as specified in Condition 7.6.5(ttt)(i)(A) and no leak is detected during that monitoring.
  - iii. The identification which has been placed on equipment determined to have a leak, except for a valve or for a connector that is subject to the provisions of Condition 7.6.5(ttt)(i)(A), may be removed after it is repaired.
- c. Conditions 7.6.5(c) through (l) apply to each pump that is in light liquid service and that is identified in Condition 7.6.3(c). [40 CFR 63.163]
- d. i. The owner or operator of a process unit subject to these conditions shall monitor each pump monthly to detect leaks by the method specified in Condition 7.6.7(a) and shall comply with the requirements of Conditions 7.6.5(c) through (f), except as provided in Conditions 7.6.5(g) through (l).

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- ii. The instrument reading, as determined by the method as specified in Condition 7.6.7(a), that defines a leak in each phase of the standard is:
  - A. For Phase I, an instrument reading of 10,000 parts per million or greater.
  - B. For Phase II, an instrument reading of 5,000 parts per million or greater.
  - C. For Phase III, an instrument reading of:
    - 1. 5,000 parts per million or greater for pumps handling polymerizing monomers;
    - 2. 2,000 parts per million or greater for pumps in food/medical service; and
    - 3. 1,000 parts per million or greater for all other pumps.
- iii. Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected.
- e. i. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition 7.6.5(e)(iii) or (ccc).
- ii. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:
  - A. Tightening of packing gland nuts.
  - B. Ensuring that the seal flush is operating at design pressure and temperature.

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- iii. For pumps in Phase III to which a 1,000 parts per million leak definition applies, repair is not required unless an instrument reading of 2,000 parts per million or greater is detected.
  
- f. i. The owner or operator shall decide no later than the first monitoring period whether to calculate percent leaking pumps on a process unit basis or on a source-wide basis. Once the owner or operator has decided, all subsequent percent calculations shall be made on the same basis.
  
- ii. If, in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak, the owner or operator shall implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176.
  
- iii. The number of pumps at a process unit shall be the sum of all the pumps in organic HAP service, except that pumps found leaking in a continuous process unit within 1 month after start-up of the pump shall not count in the percent leaking pumps calculation for that one monitoring period only.
  
- iv. Percent leaking pumps shall be determined by the following equation:

$$\%PL = ((PL-PS)/(PT-PS)) \times 100$$

Where:

%PL = Percent leaking pumps

PL = Number of pumps found leaking as determined through monthly monitoring as required in Conditions 7.6.5(d)(i) and (ii).

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- PT = Total pumps in organic HAP service, including those meeting the criteria in Conditions 7.6.5(g) and (h).
- PS = Number of pumps leaking within 1 month of start-up during the current monitoring period.

- g. Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of Conditions 7.6.5(d) through (f), provided the following requirements are met:
- i. Each dual mechanical seal system is:
    - A. Operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or
    - B. Equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of Conditions 7.6.5(eee) through (ppp); or
    - C. Equipped with a closed-loop system that purges the barrier fluid into a process stream.
  - ii. The barrier fluid is not in light liquid service.
  - iii. Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.
  - iv. Each pump is checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
    - A. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, the pump shall be monitored as specified in Condition

- 7.6.7(a) to determine if there is a leak of organic HAP in the barrier fluid.
- B. If an instrument reading of 1,000 parts per million or greater is measured, a leak is detected.
- v. Each sensor as described in Condition 7.6.5(g)(iii) is observed daily or is equipped with an alarm unless the pump is located within the boundary of an unmanned plant site.
  - vi.
    - A. The owner or operator determines, based on design considerations and operating experience, criteria applicable to the presence and frequency of drips and to the sensor that indicates failure of the seal system, the barrier fluid system, or both.
    - B. If indications of liquids dripping from the pump seal exceed the criteria established in Condition 7.6.5(g)(vi)(A), or if, based on the criteria established in Condition 7.6.5(g)(vi)(A), the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.
    - C. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition 7.6.5(ccc).
    - D. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
  - h. Any pump that is designed with no externally actuated shaft penetrating the pump housing is exempt from the requirements of Conditions 7.6.5(d) through (e).
  - i. Any pump equipped with a closed-vent system capable of capturing and transporting any leakage from the seal or seals to a process or to a fuel gas system or to a control device that complies with the requirements of

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Conditions 7.6.5(eee) through (ppp) is exempt from the requirements of Conditions 7.6.5(d) through (g).

- j. Any pump that is located within the boundary of an unmanned plant site is exempt from the weekly visual inspection requirement of Conditions 7.6.5(d)(iii) and (g)(iv), and the daily requirements of Condition 7.6.5(g)(v), provided that each pump is visually inspected as often as practicable and at least monthly.
- k. If more than 90 percent of the pumps at a process unit meet the criteria in either Condition 7.6.5(g) or (h), the process unit is exempt from the requirements of Condition 7.6.5(f).
- l. Any pump that is designated, as described in Condition 7.6.9(b)(vii)(A), as an unsafe-to-monitor pump is exempt from the requirements of Condition 7.6.5(d) through (g) if:
  - i. The owner or operator of the pump determines that the pump is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with Conditions 7.6.5(d) through (f); and
  - ii. The owner or operator of the pump has a written plan that requires monitoring of the pump as frequently as practical during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable.
- m. Conditions 7.6.5(m) through (v) apply to each compressor that is identified in Condition 7.6.3(c).  
[40 CFR 63.164]
- n. Each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided in Condition 7.6.5(u) and (v).
- o. Each compressor seal system as required in Condition 7.6.5(n) shall be:

- i. Operated with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or
  - ii. Equipped with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of Conditions 7.6.5(eee) through (ppp); or
  - iii. Equipped with a closed-loop system that purges the barrier fluid directly into a process stream.
- p. The barrier fluid shall not be in light liquid service.
- q. Each barrier fluid system as described in Conditions 7.6.5(n) through (p) shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both.
- r. i. Each sensor as required in Condition 7.6.5(q) shall be observed daily or shall be equipped with an alarm unless the compressor is located within the boundary of an unmanned plant site.
  - ii. The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both.
- s. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined under Condition 7.6.5(r)(ii), a leak is detected.
- t. i. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition 7.6.5(ccc).

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- ii. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
  
- u. A compressor is exempt from the requirements of Conditions 7.6.5(n) through (t) if it is equipped with a closed-vent system to capture and transport leakage from the compressor drive shaft seal back to a process or a fuel gas system or to a control device that complies with the requirements of Conditions 7.6.5(eee) through (ppp).
  
- v. Any compressor that is designated, as described in Condition 7.6.9(b)(ii)(B), to operate with an instrument reading of less than 500 parts per million above background, is exempt from the requirements of Conditions 7.6.5(n) through (u) if the compressor:
  - i. Is demonstrated to be operating with an instrument reading of less than 500 parts per million above background, as measured by the method specified in Condition 7.6.7(b); and
  - ii. Is tested for compliance with Condition 7.6.5(v)(i) initially upon designation, annually, and at other times requested by the Illinois EPA.
  
- w. Conditions 7.6.5(w) through (aa) apply to each pressure relief device in gas/vapor service that is identified in Condition 7.6.3(c). [40 CFR 63.165]
  
- x. Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500 parts per million above background except as provided in Condition 7.6.5(y), as measured by the method specified in Condition 7.6.7(b).
  
- y. i. After each pressure release, the pressure relief device shall be returned to a condition indicated by an instrument reading of less than 500 parts per million above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in Condition 7.6.5(ccc).

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- ii. No later than 5 calendar days after the pressure release and being returned to organic HAP service, the pressure relief device shall be monitored to confirm the condition indicated by an instrument reading of less than 500 parts per million above background, as measured by the method specified in Condition 7.6.7(b).
  
- z. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in Conditions 7.6.5(eee) through (ppp) is exempt from the requirements of Conditions 7.6.5(x) and (y).
  
- aa. i. Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of Conditions 7.6.5(x) and (y), provided the owner or operator complies with the requirements in Condition 7.6.5(aa)(ii).
  
- ii. After each pressure release, a rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in Condition 7.6.5(ccc).
  
- bb. Conditions 7.6.5(bb) through (ee) apply to each sampling connection system that is identified in Condition 7.6.3(c). [40 CFR 63.166]
  
- cc. Each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system. Gases displaced during filling of the sample container are not required to be collected or captured.
  
- dd. Each closed-purge, closed-loop, or closed-vent system as required in Condition 7.6.5(cc):
  - i. Return the purged process fluid directly to the process line; or

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- ii. Collect and recycle the purged process fluid to a process; or
- iii. Be designed and operated to capture and transport the purged process fluid to a control device that complies with the requirements of Conditions 7.6.5(eee) through (ppp); or
- iv. Collect, store, and transport the purged process fluid to a system or source identified in Condition 7.6.5(dd)(iv)(A), (B), or (C).
  - A. A waste management unit as defined in 40 CFR 63.111, if the waste management unit is subject to, and operated in compliance with the provisions of 40 CFR 63 Subpart G applicable to group 1 wastewater streams. If the purged process fluid does not contain any organic HAP listed in Table 9 of subpart G of part 63, the waste management unit need not be subject to, and operated in compliance with the requirements of 40 CFR part 63, subpart G applicable to group 1 wastewater streams provided the source has an NPDES permit or sends the wastewater to an NPDES permitted source.
  - B. A treatment, storage, or disposal source subject to regulation under 40 CFR part 262, 264, 265, or 266; or
  - C. A facility permitted, licensed, or registered by a State to manage municipal or industrial solid waste, if the process fluids are not hazardous waste as defined in 40 CFR part 261.
- ee. In-situ sampling systems and sampling systems without purges are exempt from the requirements of Conditions 7.6.5(cc) and (dd).

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- ff. Conditions 7.6.5(ff) through (kk) apply to each open-ended valve or line that is identified in Condition 7.6.3(c). [40 CFR 63.167]
- gg. i. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in Condition 7.6.5(jj) and (kk).
  - ii. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair.
- hh. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
- ii. When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with Condition 7.6.5(gg) at all other times.
- jj. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of Conditions 7.6.5(gg), (hh) and (ii).
- kk. Open-ended valves or lines containing materials which would autocatalytically polymerize or, would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in Conditions 7.6.5(gg) through (ii) are exempt from the requirements of Conditions 7.6.5(gg) through (ii).
- ll. Conditions 7.6.5(ll) through (uu) apply to each valve in gas/vapor service and in light liquid service that is identified in Condition 7.6.3(c). [40 CFR 63.168]
- mm. The owner or operator of a source subject to these conditions shall monitor all valves, except as provided in Conditions 7.6.5(ss) and (tt), at the

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intervals specified in Conditions 7.6.5(nn) and (oo) and shall comply with all other provisions of this section, except as provided in Condition 7.6.5(ccc).

- i. The valves shall be monitored to detect leaks by the method specified in Condition 7.6.7(a).
- ii. The instrument reading that defines a leak in each phase of the standard is:
  - A. For Phase I, an instrument reading of 10,000 parts per million or greater.
  - B. For Phase II, an instrument reading of 500 parts per million or greater.
  - C. For Phase III, an instrument reading of 500 parts per million or greater.
- nn. In Phases I and II, each valve shall be monitored quarterly.
- oo. In Phase III, the owner or operator shall monitor valves for leaks at the intervals specified below:
  - i. At process units with 2 percent or greater leaking valves, calculated according to Condition 7.6.5(pp), the owner or operator shall either:
    - A. Monitor each valve once per month; or
    - B. Within the first year after the onset of Phase III, implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175(d) or (e) and monitor quarterly.
  - ii. At process units with less than 2 percent leaking valves, the owner or operator shall monitor each valve once each quarter, except as provided in Conditions 7.6.5(oo)(iii) and (iv).
  - iii. At process units with less than 1 percent leaking valves, the owner or operator may

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elect to monitor each valve once every 2 quarters.

- iv. At process units with less than 0.5 percent leaking valves, the owner or operator may elect to monitor each valve once every 4 quarters.
- pp. i. Percent leaking valves at a process unit shall be determined by the following equation:

$$\%VL = (VL/(VT + VC)) \times 100$$

Where:

%VL = Percent leaking valves as determined through periodic monitoring required in Conditions 7.6.5(mm) through (oo).

VL = Number of valves found leaking excluding nonrepairables as provided in Condition 7.6.5(pp)(iii)(A).

VT = Total valves monitored, in a monitoring period excluding valves monitored as required by Condition 7.6.5(qq)(iii).

VC = Optional credit for removed valves =  $0.67 \times$  net number (i.e., total removed - total added) of valves in organic HAP service removed from process unit after the date set forth in 40 CFR 63.100(k) for existing process units, and after the date of initial start-up for new sources. If credits are not taken, then VC=0.

- ii. For use in determining monitoring frequency, as specified in Condition 7.6.5(oo), the percent leaking valves shall be calculated as a rolling average of two consecutive monitoring periods for monthly, quarterly, or semiannual monitoring programs; and as an average of any three out of four consecutive monitoring periods for annual monitoring programs.

- iii. A. Nonrepairable valves shall be included in the calculation of percent leaking valves the first time the valve is identified as leaking and nonrepairable and as required to comply with Condition 7.6.5(pp)(iii)(B). Otherwise, a number of nonrepairable valves (identified and included in the percent leaking calculation in a previous period) up to a maximum of 1 percent of the total number of valves in organic HAP service at a process unit may be excluded from calculation of percent leaking valves for subsequent monitoring periods.
- B. If the number of nonrepairable valves exceeds 1 percent of the total number of valves in organic HAP service at a process unit, the number of nonrepairable valves exceeding 1 percent of the total number of valves in organic HAP service shall be included in the calculation of percent leaking valves.
- qq. i. When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Condition 7.6.5(ccc).
- ii. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
- iii. When a leak has been repaired, the valve shall be monitored at least once within the first 3 months after its repair.
- A. The monitoring shall be conducted as specified in Condition 7.6.7(a) and (b), as appropriate, to determine whether the valve has resumed leaking.
- B. Periodic monitoring required by Conditions 7.6.5(mm) through (oo) may be used to satisfy the requirements of this Condition 7.6.5(qq)(iii), if the timing of the

monitoring period coincides with the time specified in this Condition 7.6.5(qq)(iii). Alternatively, other monitoring may be performed to satisfy the requirements of this Condition 7.6.5(qq)(iii), regardless of whether the timing of the monitoring period for periodic monitoring coincides with the time specified in this Condition 7.6.5(qq)(iii).

C. If a leak is detected by monitoring that is conducted pursuant to Condition 7.6.5(qq)(iii), the owner or operator shall follow the provisions of Conditions 7.6.5(qq)(iii)(C)(1) and (2), to determine whether that valve must be counted as a leaking valve for purposes of Condition 7.6.5(pp).

1. If the owner or operator elected to use periodic monitoring required by Conditions 7.6.5(mm) through (oo) to satisfy the requirements of Condition 7.6.5(qq)(iii), then the valve shall be counted as a leaking valve.

2. If the owner or operator elected to use other monitoring, prior to the periodic monitoring required by Conditions 7.6.5(mm) through (oo), to satisfy the requirements of Condition 7.6.5(qq)(iii), then the valve shall be counted as a leaking valve unless it is repaired and shown by periodic monitoring not to be leaking.

rr. First attempts at repair include, but are not limited to, the following practices where practicable:

- i. Tightening of bonnet bolts,
- ii. Replacement of bonnet bolts,

- iii. Tightening of packing gland nuts, and
  - iv. Injection of lubricant into lubricated packing.
- ss. Any valve that is designated, as described in Condition 7.6.9(b)(vii)(A), as an unsafe-to-monitor valve is exempt from the requirements of Conditions 7.6.5(mm) through (qq) if:
- i. The owner or operator of the valve determines that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with Conditions 7.6.5(mm) through (oo); and
  - ii. The owner or operator of the valve has a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable.
- tt. Any valve that is designated, as described in Condition 7.6.9(b)(vii)(B), as a difficult-to-monitor valve is exempt from the requirements of Conditions 7.6.5(mm) through (oo) if:
- i. The owner or operator of the valve determines that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner;
  - ii. The process unit within which the valve is located is an existing source or the owner or operator designates less than 3 percent of the total number of valves in a new source as difficult-to-monitor; and
  - iii. The owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year.
- uu. Any equipment located at a plant site with fewer than 250 valves in organic HAP service is exempt from the

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- requirements for monthly monitoring and a quality improvement program specified in Condition 7.6.5(oo)(i). Instead, the owner or operator shall monitor each valve in organic HAP service for leaks once each quarter, or comply with Conditions 7.6.5(oo)(iii) or (iv) except as provided in Conditions 7.6.5(ss) and (tt).
- vv. Conditions 7.6.5(vv) through (zz) apply to each pump, valve, connector, and agitator in heavy liquid service; instrumentation system; and pressure relief device in liquid service that is identified in Condition 7.6.3(c). [40 CFR 63.169]
- ww. Pumps, valves, connectors, and agitators in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and instrumentation systems shall be monitored within 5 calendar days by the method specified in Condition 7.6.7(a) if evidence of a potential leak to the atmosphere is found by visual, audible, olfactory, or any other detection method. If such a potential leak is repaired as required in Conditions 7.6.5(yy) and (zz), it is not necessary to monitor the system for leaks by the method specified in Condition 7.6.7(a).
- xx. If an instrument reading of 10,000 parts per million or greater for agitators, 5,000 parts per million or greater for pumps handling polymerizing monomers, 2,000 parts per million or greater for pumps in food/medical service or pumps subject to Condition 7.6.5(d)(ii)(C)(3), or 500 parts per million or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured, a leak is detected.
- yy. i. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Condition 7.6.5(ccc).
- ii. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

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- iii. For equipment identified in Condition 7.6.5(ww) that is not monitored by the method specified in Condition 7.6.7(a), repaired shall mean that the visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated; that no bubbles are observed at potential leak sites during a leak check using soap solution; or that the system will hold a test pressure.
- zz. First attempts at repair include, but are not limited to, the practices described under Conditions 7.6.5(e)(ii) and (rr), for pumps and valves, respectively.
- aaa. Conditions 7.6.5(aaa) through (bbb) apply to each surge control vessel and bottoms receiver that is identified in Condition 7.6.3(c). [40 CFR 63.170]
- bbb. Each surge control vessel or bottoms receiver that is not routed back to the process and that meets the conditions specified in table 2 or table 3 of 40 CFR 63 Subpart H shall be equipped with a closed-vent system that routes the organic vapors vented from the surge control vessel or bottoms receiver back to the process or to a control device that complies with the requirements in Conditions 7.6.5(eee) through (ppp) or comply with the requirements of 40 CFR 63.119(b) or (c).
- ccc. Delay of repair of any equipment identified in Condition 7.6.3(c). [40 CFR 63.171]
  - i. Delay of repair of equipment for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur by the end of the next process unit shutdown.
  - ii. Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in organic HAP service.
  - iii. Delay of repair for valves, connectors, and agitators is also allowed if:

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- A. The owner or operator determines that emissions of purged material resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair, and
  - B. When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with Conditions 7.6.5(eee) through (ppp).
- iv. Delay of repair for pumps is also allowed if:
- A. Repair requires replacing the existing seal design with a new system that the owner or operator has determined under the provisions of 40 CFR 63.176(d) will provide better performance or:
    - 1. A dual mechanical seal system that meets the requirements of Condition 7.6.5(g),
    - 2. A pump that meets the requirements of Condition 7.6.5(g), or
    - 3. A closed-vent system and control device that meets the requirements of Condition 7.6.5(h); and
  - B. Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
- v. Delay of repair beyond a process unit shutdown will be allowed for a valve if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the second process unit shutdown will not be allowed unless the third process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

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- ddd. Conditions 7.6.5(ddd) through (ppp) apply to each closed-vent system and control device identified in Condition 7.6.3(c). [40 CFR 63.172]
- eee. Recovery or recapture devices (e.g., condensers and absorbers) shall be designed and operated to recover the organic hazardous air pollutant emissions or volatile organic compounds emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent.
- fff. Enclosed combustion devices shall be designed and operated to reduce the organic hazardous air pollutant emissions or volatile organic compounds emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent, or to provide a minimum residence time of 0.50 seconds at a minimum temperature of 760 °C.
- ggg. Flares used to comply with these conditions shall comply with the requirements of 40 CFR 63.11(b).
- hhh. Owners or operators of control devices that are used to comply with the provisions of this subpart shall monitor these control devices to ensure that they are operated and maintained in conformance with their design.
- iii. Except as provided in Conditions 7.6.5(nnn) and (ooo), each closed-vent system shall be inspected according to the procedures and schedule specified in Conditions 7.6.5(iii)(i) and (ii).
- i. If the closed-vent system is constructed of hard-piping, the owner or operator shall:
- A. Conduct an initial inspection according to the procedures in Condition 7.6.5(jjj), and

- B. Conduct annual visual inspections for visible, audible, or olfactory indications of leaks.
- ii. If the vapor collection system or closed-vent system is constructed of duct work, the owner or operator shall:
  - A. Conduct an initial inspection according to the procedures in Condition 7.6.5(jjj), and
  - B. Conduct annual inspections according to the procedures in Condition 7.6.5(jjj).
- jjj. Each closed-vent system shall be inspected according to the procedures in Condition 7.6.7(a).
- kkk. Leaks, as indicated by an instrument reading greater than 500 parts per million above background or by visual inspections, shall be repaired as soon as practicable, except as provided in Condition 7.6.5(lll).
  - i. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
  - ii. Repair shall be completed no later than 15 calendar days after the leak is detected, except as provided in Condition 7.6.5(lll).
- lll. Delay of repair of a closed-vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown.
- mmm. For each closed-vent system that contains bypass lines that could divert a vent stream away from the control device and to the atmosphere, the owner or operator shall comply with the provisions of either Condition

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7.6.5(mmm)(i) or (ii), except as provided in Condition 7.6.5(mmm)(iii).

- i. Install, set or adjust, maintain, and operate a flow indicator that takes a reading at least once every 15 minutes. Records shall be generated as specified in 40 CFR 63.118(a)(3). The flow indicator shall be installed at the entrance to any bypass line; or
- ii. Secure the bypass line valve in the non-diverting position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line.
- iii. Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to this paragraph.

nnn. Any parts of the closed-vent system that are designated, as described in Condition 7.6.9(b)(vii)(A), as unsafe to inspect are exempt from the inspection requirements of Conditions 7.6.5(iii)(i) and (ii) if:

- i. The owner or operator determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with Conditions 7.6.5(iii)(i) or (ii); and
- ii. The owner or operator has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually.

ooo. Any parts of the closed-vent system that are designated, as described in Condition

7.6.9(b)(vii)(A), as difficult to inspect are exempt from the inspection requirements of Conditions 7.6.5(iii)(i) and (ii) if:

- i. The owner or operator determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and
- ii. The owner or operator has a written plan that requires inspection of the equipment at least once every 5 years.

ppp. Whenever organic HAP emissions are vented to a closed-vent system or control device used to comply with the provisions of these conditions, such system or control device shall be operating.

qqq. Conditions 7.6.5(qqq) through (zzz) apply to each connector in gas/vapor service and in light liquid service identified in Condition 7.6.3(c). [40 CFR 63.174]

rrr. The owner or operator of a process unit subject to these conditions shall monitor all connectors in gas/vapor and light liquid service, except as provided in Conditions 7.6.5(vvv) through (xxx), at the intervals specified in Condition 7.6.5(sss).

- i. The connectors shall be monitored to detect leaks by the method specified in Condition 7.6.7(a).
- ii. If an instrument reading greater than or equal to 500 parts per million is measured, a leak is detected.

sss. The owner or operator shall monitor for leaks at the intervals specified in either Condition 7.6.5(sss)(i) or (ii) and in Condition 7.6.5(sss)(iii).

- i. For each group of existing process units within an existing source, by no later than 12 months after the compliance date, the owner or operator shall monitor all connectors, except

as provided in Conditions 7.6.5(vvv) through (xxx).

- ii. For new sources, within the first 12 months after initial start-up or by no later than 12 months after the date of promulgation of a specific subpart that references these conditions, whichever is later, the owner or operator shall monitor all connectors, except as provided in Conditions 7.6.5(vvv) through (xxx).
- iii. After conducting the initial survey required in Condition 7.6.5(sss)(i) or (ii), the owner or operator shall perform all subsequent monitoring of connectors at the frequencies specified in Conditions 7.6.5(sss)(iii)(A) through (E), except as provided in Condition 7.6.5(ttt)(ii):
  - A. Once per year (i.e., 12-month period), if the percent leaking connectors in the process unit was 0.5 percent or greater during the last required annual or biennial monitoring period.
  - B. Once every 2 years, if the percent leaking connectors was less than 0.5 percent during the last required monitoring period. An owner or operator may comply with this paragraph by monitoring at least 40 percent of the connectors in the first year and the remainder of the connectors in the second year. The percent leaking connectors will be calculated for the total of all monitoring performed during the 2-year period.
  - C. If the owner or operator of a process unit in a biennial leak detection and repair program calculates less than 0.5 percent leaking connectors from the 2-year monitoring period, the owner or operator may monitor the connectors one time every 4 years. An owner or operator may comply with the requirements of this paragraph by

monitoring at least 20 percent of the connectors each year until all connectors have been monitored within 4 years.

- D. If a process unit complying with the requirements of Condition 7.6.5(sss) using a 4-year monitoring interval program has greater than or equal to 0.5 percent but less than 1 percent leaking connectors, the owner or operator shall increase the monitoring frequency to one time every 2 years. An owner or operator may comply with the requirements of this paragraph by monitoring at least 40 percent of the connectors in the first year and the remainder of the connectors in the second year. The owner or operator may again elect to use the provisions of Condition 7.6.5(sss)(iii)(C) when the percent leaking connectors decreases to less than 0.5 percent.
  - E. If a process unit complying with requirements of Condition 7.6.5(sss)(iii)(C) using a 4-year monitoring interval program has 1 percent or greater leaking connectors, the owner or operator shall increase the monitoring frequency to one time per year. The owner or operator may again elect to use the provisions of Condition 7.6.5(sss)(iii)(C) when the percent leaking connectors decreases to less than 0.5 percent.
- iv. The use of monitoring data generated before April 22, 1994 to qualify for less frequent monitoring is governed by the provisions of Condition 7.6.7(a)(vi).
- ttt. i. A. Except as provided in Condition 7.6.5(ttt)(i)(B), each connector that has been opened or has otherwise had the seal broken shall be monitored for leaks when it is reconnected or within the first 3 months after being returned to organic hazardous air pollutants service. If the

monitoring detects a leak, it shall be repaired according to the provisions of Condition 7.6.5(uuu), unless it is determined to be nonrepairable, in which case it is counted as a nonrepairable connector for the purposes of Condition 7.6.5(yyy)(ii).

- B. As an alternative to the requirements in Condition 7.6.5(ttt)(i)(A), an owner or operator may choose not to monitor connectors that have been opened or otherwise had the seal broken. In this case, the owner or operator may not count nonrepairable connectors for the purposes of Condition 7.6.5(yyy)(ii). The owner or operator shall calculate the percent leaking connectors for the monitoring periods described in Condition 7.6.5(sss), by setting the nonrepairable component, CAN, in the equation in Condition 7.6.5(yyy)(ii) to zero for all monitoring periods.
  - C. An owner or operator may switch alternatives described in Conditions 7.6.5(ttt)(i)(A) and (B) at the end of the current monitoring period he is in, provided that it is reported as required in Condition 7.6.10 and begin the new alternative in annual monitoring. The initial monitoring in the new alternative shall be completed no later than 12 months after reporting the switch.
- ii. As an alternative to the requirements of Condition 7.6.5(sss)(iii), each screwed connector 2 inches or less in nominal inside diameter installed in a process unit before the dates specified in Conditions 7.6.5(ttt)(ii)(C) or (D):
- A. Comply with the requirements of Conditions 7.6.5(vv) through (zz), and

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- B. Be monitored for leaks within the first 3 months after being returned to organic hazardous air pollutants service after having been opened or otherwise had the seal broken. If that monitoring detects a leak, it shall be repaired according to the provisions of Condition 7.6.5(uuu).
- C. For sources subject to 40 CFR 63 subparts F and I, the provisions of Condition 7.6.5(ttt)(ii) apply to screwed connectors installed before December 31, 1992.
- D. For sources not identified in Condition 7.6.5(ttt)(ii)(C), the provisions of Condition 7.6.5(ttt)(ii) apply to screwed connectors installed before the date of proposal of the applicable subpart that references these conditions.

uuu. When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Conditions 7.6.5(www) and (ccc). A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.

vvv. Any connector that is designated, as described in Condition 7.6.9(b)(vii)(A), as an unsafe-to-monitor connector is exempt from the requirements of Condition 7.6.5(rrr) if:

- i. The owner or operator determines that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with Conditions 7.6.5(rrr) through (uuu); and
- ii. The owner or operator has a written plan that requires monitoring of the connector as frequently as practicable during safe to monitor periods, but not more frequently than the periodic schedule otherwise applicable.

www. Any connector that is designated, as described in Condition 7.6.9(b)(vii)(C), as an unsafe-to-repair

connector is exempt from the requirements of Condition 7.6.5(rrr) and (uuu) if:

- i. The owner or operator determines that repair personnel would be exposed to an immediate danger as a consequence of complying with Condition 7.6.5(uuu); and
  - ii. The connector will be repaired before the end of the next scheduled process unit shutdown.
- xxx. i. Any connector that is inaccessible or is ceramic or ceramic-lined (e.g., porcelain, glass, or glass-lined), is exempt from the monitoring requirements of Conditions 7.6.5(rrr) and (ttt) and from the recordkeeping and reporting requirements of Condition 7.6.9(a) through (h) and 7.6.10(b) and (c).
- A. Buried;
  - B. Insulated in a manner that prevents access to the connector by a monitor probe;
  - C. Obstructed by equipment or piping that prevents access to the connector by a monitor probe;
  - D. Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold which would allow access to connectors up to 7.6 meters (25 feet) above the ground;
  - E. Inaccessible because it would require elevating the monitoring personnel more than 2 meters above a permanent support surface or would require the erection of scaffold; or
  - F. Not able to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where

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an ignition potential exists, or access would require near proximity to hazards such as electrical lines, or would risk damage to equipment.

- ii. If any inaccessible or ceramic or ceramic-lined connector is observed by visual, audible, olfactory, or other means to be leaking, the leak shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Conditions 7.6.5(ccc) and (www).
  - iii. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.
- yyy. For use in determining the monitoring frequency, as specified in Condition 7.6.5((sss), the percent leaking connectors shall be calculated as specified in Conditions 7.6.5(yyy)(i) and (ii).

- i. For the first monitoring period, use the following equation:

$$\%CL = CL / (Ct + CC) \times 100$$

Where:

- %CL = Percent leaking connectors as determined through periodic monitoring required in Conditions 7.6.5(rrr) and (sss).
- CL = Number of connectors measured at 500 parts per million or greater, by the method specified in Condition 7.6.7(a).
- Ct = Total number of monitored connectors in the process unit.
- CC = Optional credit for removed connectors =  $0.67 \times$  net (i.e., total removed-total added) number of connectors in organic hazardous air

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pollutants service removed from the process unit after the compliance date set forth in the applicable subpart for existing process units, and after the date of initial start-up for new process units. If credits are not taken, then CC= 0.

- ii. For subsequent monitoring periods, use the following equation:

$$\%CL = [(CL - CAN) / (Ct + CC)] \times 100$$

Where:

- %CL = Percent leaking connectors as determined through periodic monitoring required in Conditions 7.6.5(rrr) and (sss).
- CL = Number of connectors, including nonrepairables, measured at 500 parts per million or greater, by the method specified in Condition 7.6.7(a).
- CAN = Number of allowable nonrepairable connectors, as determined by monitoring required in Conditions 7.6.5(sss)(iii) and (ttt), not to exceed 2 percent of the total connector population, Ct.
- Ct = Total number of monitored connectors, including nonrepairables, in the process unit.
- CC = Optional credit for removed connectors =  $0.67 \times$  net number (i.e., total removed-total added) of connectors in organic hazardous air pollutants service removed from the process unit after the compliance date set forth in the applicable subpart for existing process units, and after the date of initial start-

up for new process units. If credits are not taken, then CC= 0.

zzz. Optional credit for removed connectors. If an owner or operator eliminates a connector subject to monitoring under Condition 7.6.5(sss), the owner or operator may receive credit for elimination of the connector, as described in Condition 7.6.5(yyy), provided the requirements in Conditions 7.6.5(zzz)(i) through (iv) are met.

- i. The connector was welded after the date of proposal of the specific subpart that references these conditions.
- ii. The integrity of the weld is demonstrated by monitoring it according to the procedures in Condition 7.6.7(a) or by testing using X-ray, acoustic monitoring, hydrotesting, or other applicable method.
- iii. Welds created after the date of proposal but before the date of promulgation of a specific subpart that references these conditions are monitored or tested by 3 months after the compliance date specified in the applicable subpart.
- iv. Welds created after promulgation of the subpart that references these conditions are monitored or tested within 3 months after being welded.
- v. If an inadequate weld is found or the connector is not welded completely around the circumference, the connector is not considered a welded connector and is therefore not exempt from the provisions of these conditions.

#### 7.6.6 Emission Limitations

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

- a. Emissions from the affected equipment at the Eastman facility shall not exceed the following limits:

VOM Emissions	
<u>(T/mo)</u>	<u>(T/yr)</u>
1.2	11.95

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

The above limitations were established in Permit 99060010, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- b. Emissions from the affected equipment in gasoline service shall not exceed 29.8 T/yr of VOM emissions.

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

The above limitations were established in Permit 96080122, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

#### 7.6.7 Testing Requirements

- a. Monitoring, as required under Condition 7.6.5, shall comply with the following requirements: [40 CFR 63.180(b)]
- i. Monitoring shall comply with Method 21 of 40 CFR part 60, appendix A.

- ii. A. Except as provided for in Condition 7.6.7(a)(ii)(B), the detection instrument shall meet the performance criteria of Method 21 of 40 CFR part 60, appendix A, except the instrument response factor criteria in Section 3.1.2(a) of Method 21 shall be for the average composition of the process fluid not each individual VOC in the stream. For process streams that contain nitrogen, water, air, or other inerts which are not organic HAP's or VOC's, the average stream response factor may be calculated on an inert-free basis. The response factor may be determined at any concentration for which monitoring for leaks will be conducted.
- B. If no instrument is available at the plant site that will meet the performance criteria specified in Condition 7.6.7(a)(ii)(A), the instrument readings may be adjusted by multiplying by the average response factor of the process fluid, calculated on an inert-free basis as described in Condition 7.6.7(a)(ii)(A).
- iii. The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21 of 40 CFR part 60, appendix A.
- iv. Calibration gases shall be:
  - A. Zero air (less than 10 parts per million of hydrocarbon in air); and
  - B. Mixtures of methane in air at the concentrations specified in Conditions 7.6.7(a)(iv)(B)(1) through (3). A calibration gas other than methane in air may be used if the instrument does not respond to methane or if the instrument does not meet the performance criteria specified in Condition 7.6.7(a)(ii)(A). In such cases, the calibration gas may be a

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mixture of one or more of the compounds to be measured in air.

1. For Phase I, a mixture of methane or other compounds, as applicable, in air at a concentration of approximately, but less than, 10,000 parts per million.
  2. For Phase II, a mixture of methane or other compounds, as applicable, and air at a concentration of approximately, but less than, 10,000 parts per million for agitators, 5,000 parts per million for pumps, and 500 parts per million for all other equipment, except as provided in Condition 7.6.7(a)(iv)(C).
  3. For Phase III, a mixture of methane or other compounds, as applicable, and air at a concentration of approximately, but less than, 10,000 parts per million methane for agitators; 2,000 parts per million for pumps in food/medical service; 5,000 parts per million for pumps in polymerizing monomer service; 1,000 parts per million for all other pumps; and 500 parts per million for all other equipment, except as provided in Condition (a)(iv)(C).
- C. The instrument may be calibrated at a higher methane concentration than the concentration specified for that piece of equipment. The concentration of the calibration gas may exceed the concentration specified as a leak by no more than 2,000 parts per million. If the monitoring instrument's design allows for multiple calibration scales, then the lower scale shall be calibrated with a calibration gas that is no higher than 2,000 parts per million above the concentration specified as a leak and the

highest scale shall be calibrated with a calibration gas that is approximately equal to 10,000 parts per million. If only one scale on an instrument will be used during monitoring, the owner or operator need not calibrate the scales that will not be used during that day's monitoring.

- v. Monitoring shall be performed when the equipment is in organic HAP service, in use with an acceptable surrogate volatile organic compound which is not an organic HAP, or is in use with any other detectable gas or vapor.
- vi. Monitoring data that do not meet the criteria specified in Conditions 7.6.7(a)(i) through (v) may be used to qualify for less frequent monitoring under the provisions in Conditions 7.6.5(oo)(ii) and (iii) or 7.6.5(sss)(iii)(B) or 7.6.5(sss)(iii)(C) provided the data meet the conditions specified in Conditions 7.6.7(a)(vi)(A) and (B).
  - A. The data were obtained before April 22, 1994.
  - B. The departures from the criteria specified in Conditions 7.6.7(a)(i) through (v) or from the specified monitoring frequency of Condition 7.6.5(nn) are minor and do not significantly affect the quality of the data. Examples of minor departures are monitoring at a slightly different frequency (such as every six weeks instead of monthly or quarterly), following the performance criteria of section 3.1.2(a) of Method 21 of appendix A of 40 CFR part 60 instead of Condition 7.6.7(a)(ii), or monitoring at a different leak definition if the data would indicate the presence or absence of a leak at the concentration specified in these conditions. Failure to use a calibrated instrument is not considered a minor departure.

- b. When equipment is monitored for compliance as required in Conditions 7.6.5(v), (x), and (iii) or when equipment subject to a leak definition of 500 ppm is monitored for leaks as required by these conditions, the owner or operator may elect to adjust or not to adjust the instrument readings for background. If an owner or operator elects to not adjust instrument readings for background, the owner or operator shall monitor the equipment according to the procedures specified in Conditions 7.6.7(a)(i) through (iv). In such case, all instrument readings shall be compared directly to the applicable leak definition to determine whether there is a leak. If an owner or operator elects to adjust instrument readings for background, the owner or operator shall monitor the equipment according to the procedures specified in Conditions 7.6.7(b)(i) through (iv). [40 CFR 63.180(c)]
- i. The requirements of Conditions 7.6.7(a)(i) through (iv) shall apply.
  - ii. The background level shall be determined, using the same procedures that will be used to determine whether the equipment is leaking.
  - iii. The instrument probe shall be traversed around all potential leak interfaces as close to the interface as possible as described in Method 21 of 40 CFR part 60, appendix A.
  - iv. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 parts per million for determining compliance.
- c. i. Each piece of affected benzene equipment within a process unit that can reasonably be expected to contain equipment in organic HAP service is presumed to be in organic HAP service unless an owner or operator demonstrates that the piece of equipment is not in organic HAP service. For a piece of equipment to be considered not in organic HAP service, it must be determined that the percent organic HAP content can be reasonably

expected not to exceed 5 percent by weight on an annual average basis. For purposes of determining the percent organic HAP content of the process fluid that is contained in or contacts equipment, Method 18 of 40 CFR part 60, appendix A shall be used. [40 CFR 63.180(d)]

- ii. A. An owner or operator may use good engineering judgment rather than the procedures in Condition 7.6.7(c)(i) to determine that the percent organic HAP content does not exceed 5 percent by weight. When an owner or operator and the Illinois EPA do not agree on whether a piece of equipment is not in organic HAP service, however, the procedures in Condition 7.6.7(c)(i) shall be used to resolve the disagreement.
  - B. Conversely, the owner or operator may determine that the organic HAP content of the process fluid does not exceed 5 percent by weight by, for example, accounting for 98 percent of the content and showing that organic HAP is less than 3 percent.
  - iii. If an owner or operator determines that a piece of affected benzene equipment is in organic HAP service, the determination can be revised after following the procedures in Condition 7.6.7(c)(i), or by documenting that a change in the process or raw materials no longer causes the equipment to be in organic HAP service.
  - iv. Samples used in determining the percent organic HAP content shall be representative of the process fluid that is contained in or contacts the equipment.
- d. When a flare is used to comply with Condition 7.6.5(ggg), the compliance determination shall be conducted using Method 22 of 40 CFR part 60, appendix A to determine visible emissions. [40 CFR 63.180(e)]

7.6.8 Monitoring Requirements

See Conditions 7.6.5 and 7.6.7

7.6.9 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 to demonstrate compliance with Conditions 5.5.1, 7.6.3, and 7.6.6 pursuant to Section 39.5(7)(b) of the Act:

- a. An owner or operator of more than one process unit subject to the provisions of Condition 7.6.5 may comply with the recordkeeping requirements for these process units in one recordkeeping system if the system identifies each record by process unit and the program being implemented (e.g., quarterly monitoring, quality improvement) for each type of equipment. All records and information required by these conditions shall be maintained in a manner that can be readily accessed at the plant site. This could include physically locating the records at the plant site or accessing the records from a central location by computer at the plant site. [40 CFR 63.181(a)]
- b. The following information pertaining to all equipment in each process unit subject to the requirements in Conditions 7.6.5 shall be recorded: [40 CFR 63.181(b)]
  - i. A. A list of identification numbers for equipment (except connectors exempt from monitoring and recordkeeping identified in Conditions 7.6.5(qqq) through (zzz) and instrumentation systems) subject to the requirements of these conditions. Connectors need not be individually identified if all connectors in a designated area or length of pipe subject to the provisions of these conditions are identified as a group, and the number of connectors subject is indicated. With respect to connectors, the list shall be complete no later than the completion of

the initial survey required by Condition 7.6.5(sss)(i) or (ii).

- B. A schedule by process unit for monitoring connectors subject to the provisions of Condition 7.6.5(rrr) and valves subject to the provisions of Condition 7.6.5(oo).
  - C. Physical tagging of the equipment to indicate that it is in organic HAP service is not required. Equipment subject to the provisions of these conditions may be identified on a plant site plan, in log entries, or by other appropriate methods.
- ii.
- A. A list of identification numbers for equipment that the owner or operator elects to equip with a closed-vent system and control device, under the provisions of Condition 7.6.5(i), (u), or (z).
  - B. A list of identification numbers for compressors that the owner or operator elects to designate as operating with an instrument reading of less than 500 parts per million above background, under the provisions of Condition 7.6.5(v).
  - C. Identification of surge control vessels or bottoms receivers subject to the provisions of these conditions that the owner or operator elects to equip with a closed-vent system and control device, under the provisions of Conditions 7.6.5(aaa) and (bbb).
- iii.
- A. A list of identification numbers for pressure relief devices subject to the provisions in Condition 7.6.5(x).
  - B. A list of identification numbers for pressure relief devices equipped with rupture disks, under the provisions of Condition 7.6.5(aa).

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- iv. Identification of instrumentation systems subject to the provisions of these conditions. Individual components in an instrumentation system need not be identified.
- v. Identification of screwed connectors subject to the requirements of Condition 7.6.5(ttt)(ii). Identification can be by area or grouping as long as the total number within each group or area is recorded.
- vi. The following information shall be recorded for each dual mechanical seal system:
  - A. Design criteria required in Conditions 7.6.5(g)(vi)(A) and (r)(ii) and an explanation of the design criteria; and
  - B. Any changes to these criteria and the reasons for the changes.
- vii. The following information pertaining to all pumps subject to the provisions of Condition 7.6.5(l), valves subject to the provisions of Conditions 7.6.5(ss) and (tt), and connectors subject to the provisions of Conditions 7.6.5(vvv) and (www) shall be recorded:
  - A. Identification of equipment designated as unsafe to monitor, difficult to monitor, or unsafe to inspect and the plan for monitoring or inspecting this equipment.
  - B. A list of identification numbers for the equipment that is designated as difficult to monitor, an explanation of why the equipment is difficult to monitor, and the planned schedule for monitoring this equipment.
  - C. A list of identification numbers for connectors that are designated as unsafe to repair and an explanation why the connector is unsafe to repair.

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- viii. A. A list of valves removed from and added to the process unit, as described in Condition 7.6.5(pp)(i), if the net credits for removed valves is expected to be used.
- B. A list of connectors removed from and added to the process unit, as described in Condition 7.6.5(yyy)(i), and documentation of the integrity of the weld for any removed connectors, as required in Condition 7.6.5(zzz). This is not required unless the net credits for removed connectors is expected to be used.
- c. For visual inspections of equipment subject to the provisions of these conditions [e.g., Conditions 7.6.5(d)(iii), 7.6.5(g)(iv)(A)], the owner or operator shall document that the inspection was conducted and the date of the inspection. The owner or operator shall maintain records as specified in Condition 7.6.9(d) for leaking equipment identified in this inspection. [40 CFR 63.181(c)]
- d. When each leak is detected as specified in Conditions 7.6.5(c) through (v); (ll) through (zz); and (ddd) through (zzz), the following information shall be recorded: [40 CFR 63.181(d)]
  - i. The instrument and the equipment identification number and the operator name, initials, or identification number.
  - ii. The date the leak was detected and the date of first attempt to repair the leak.
  - iii. The date of successful repair of the leak.
  - iv. Maximum instrument reading measured by Method 21 of 40 CFR part 60, appendix A after it is successfully repaired or determined to be nonrepairable.
  - v. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

- A. The owner or operator may develop a written procedure that identifies the conditions that justify a delay of repair. The written procedures may be included as part of the startup/shutdown/malfunction plan, required by 40 CFR 63.6(e)(3), for the source or may be part of a separate document that is maintained at the plant site. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.
  - B. If delay of repair was caused by depletion of stocked parts, there must be documentation that the spare parts were sufficiently stocked on-site before depletion and the reason for depletion.
- vi. Dates of process unit shutdowns that occur while the equipment is unrepaired.
- vii. A. Identification, either by list, location (area or grouping), or tagging of connectors that have been opened or otherwise had the seal broken since the last monitoring period required in Condition 7.6.5(sss), as described in Condition 7.6.5(ttt)(i), unless the owner or operator elects to comply with the provisions of Condition 7.6.5(ttt)(i)(B).
- B. The date and results of monitoring as required in Condition 7.6.5(ttt). If identification of connectors that have been opened or otherwise had the seal broken is made by location under Condition 7.6.9(d)(vii)(A), then all connectors within the designated location shall be monitored.
- viii. Copies of the periodic reports as specified in Condition 7.6.10(c), if records are not maintained on a computerized database capable of generating summary reports from the records.

- e. The dates and results of each compliance test required for compressors subject to the provisions in Condition 7.6.5(v) and the dates and results of the monitoring following a pressure release for each pressure relief device subject to the provisions in Conditions 7.6.5(x) and (y). The results shall include: [40 CFR 63.181(f)]
  - i. The background level measured during each compliance test.
  - ii. The maximum instrument reading measured at each piece of equipment during each compliance test.
- f. The owner or operator shall maintain records of the information specified in Conditions 7.6.9(f)(i) through (iii) for closed-vent systems and control devices subject to the provisions of Conditions 7.6.5(ddd) through (ppp). The records specified in Condition 7.6.9(f)(i) shall be retained for the life of the equipment. [40 CFR 63.181(g)]
  - i. The design specifications and performance demonstrations specified in Conditions 7.6.9(f)(i)(A) through (D).
    - A. Detailed schematics, design specifications of the control device, and piping and instrumentation diagrams.
    - B. The dates and descriptions of any changes in the design specifications.
    - C. The flare design (i.e., steam-assisted, air-assisted, or non-assisted) and the results of the compliance demonstration required by 40 CFR 63.11(b).
    - D. A description of the parameter or parameters monitored, as required in Condition 7.6.5(hhh), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that

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parameter (or parameters) was selected for the monitoring.

- ii. Records of operation of closed-vent systems and control devices, as specified in Conditions 7.6.9(f)(ii)(A) through (C).
  - A. Dates and durations when the closed-vent systems and control devices required in Conditions 7.6.5(c) through (ee) and (aaa) through (bbb) are not operated as designed as indicated by the monitored parameters, including periods when a flare pilot light system does not have a flame.
  - B. Dates and durations during which the monitoring system or monitoring device is inoperative.
  - C. Dates and durations of start-ups and shutdowns of control devices required in Conditions 7.6.5(c) through (ee) and (aaa) through (bbb).
- iii. Records of inspections of closed-vent systems subject to the provisions of Conditions 7.6.5(ddd) through (ppp), as specified in Conditions 7.6.9(f)(iii)(A) and (B).
  - A. For each inspection conducted in accordance with the provisions of Condition 7.6.5(iii)(i) or (ii) during which no leaks were detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected.
  - B. For each inspection conducted in accordance with the provisions of Condition 7.6.5(iii)(i) or (ii) during which leaks were detected, the information specified in Condition 7.6.9(d) shall be recorded.
- g. The owner or operator of equipment in heavy liquid service shall comply with the requirements of either

Condition 7.6.9(g)(i) or (ii), as provided in  
Condition 7.6.9(g)(iii). [40 CFR 63.181(i)]

- i. Retain information, data, and analyses used to determine that a piece of equipment is in heavy liquid service.
  - ii. When requested by the Illinois EPA, demonstrate that the piece of equipment or process is in heavy liquid service.
  - iii. A determination or demonstration that a piece of equipment or process is in heavy liquid service shall include an analysis or demonstration that the process fluids do not meet the definition of "in light liquid service." Examples of information that could document this include, but are not limited to, records of chemicals purchased for the process, analyses of process stream composition, engineering calculations, or process knowledge.
- h. Identification, either by list, location (area or group) of equipment in organic HAP service (i.e. benzene service) less than 300 hours per year. [40 CFR 63.181(j)]
  - i. Throughput (gal/mo and gal/yr) and physical properties of each VOL transferred through the affected equipment.

#### 7.6.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected equipment with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- b. Each owner or operator of a source subject to the Conditions in 7.6.5 shall submit the reports listed in Conditions 7.6.10(b)(i) through (iii). [40 CFR 63.182(a)]

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- i. An Initial Notification described in 40 CFR 63.182(b), and
  - ii. A Notification of Compliance Status described in 40 CFR 63.182(c), and
  - iii. Periodic Reports described in Condition 7.6.10 (c).
- c. The owner or operator of a source subject to this condition shall submit Periodic Reports. [40 CFR 63.182(d)]
- i. A report containing the information in Conditions 7.6.10(c)(ii) and (iii) shall be submitted semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c). Each subsequent periodic report shall cover the 6 month period following the preceding period.
  - ii. For each process unit complying with the provisions of Conditions 7.6.5(c) through (zzz), the summary information listed in Conditions 7.6.10(c)(ii)(A) through (L) for each monitoring period during the 6-month period.
    - A. The number of valves for which leaks were detected as described in Condition 7.6.5(mm), the percent leakers, and the total number of valves monitored;
    - B. The number of valves for which leaks were not repaired as required in Condition 7.6.5(qq), identifying the number of those that are determined nonrepairable;
    - C. The number of pumps for which leaks were detected as described in Condition 7.6.5(d), the percent leakers, and the total number of pumps monitored;
    - D. The number of pumps for which leaks were not repaired as required in Condition 7.6.5(e);

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- E. The number of compressors for which leaks were detected as described in Condition 7.6.5(s);
  - F. The number of compressors for which leaks were not repaired as required in Condition 7.6.5(t);
  - G. The number of connectors for which leaks were detected as described in Condition 7.6.5(rrr), the percent of connectors leaking, and the total number of connectors monitored;
  - H. The number of connectors for which leaks were not repaired as required in Condition 7.6.5(uuu), identifying the number of those that are determined nonreparable;
  - I. The facts that explain any delay of repairs and, where appropriate, why a process unit shutdown was technically infeasible;
  - J. The results of all monitoring to show compliance with Conditions 7.6.5(v), (x), and (iii) conducted within the semiannual reporting period;
  - K. If applicable, the initiation of a monthly monitoring program under Condition 7.6.5(oo)(i)(A); and
  - L. If applicable, notification of a change in connector monitoring alternatives as described in Condition 7.6.5(ttt)(i).
- iii. The information listed in 40 CFR 63.182(c) for the Notification of Compliance Status for process units with later compliance dates. Any revisions to items reported in earlier Notification of Compliance Status, if the method of compliance has changed since the last report.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

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

Changes in the material transferred through the affected equipment, provided the affected equipment continue to comply with the conditions of this permit.

7.6.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

a. Equipment Leaks

$$L_c = 1 \times 12 \times \sum(N_i \times E_{f_i}) \times \%Leaking$$

Where:

$L_c$  = Component Losses, lb/yr

Fugitive loss duration factor = 1 hr/mo

Conversion factor = 12 mo/yr

$N_i$  = Number of components

$E_{f_i}$  = Emission factor, lb/hr-component

% Observed Leaking Based on LDAR

Equation and emission factors are from AP-42 for petroleum storage tanks and the CTG for Chemical Batch Processes for chemical organic liquid.

b. Drip Pan (Spillage) Losses

$$L_{dp} = EF \times (Q_{stg}/1000) \times (100\% - \%Recovered)$$

Where:

$L_{dp}$  = Drip Pan Losses, lb/yr

$EF$  = 0.7 lb/10<sup>3</sup> gallons throughput

$Q_{stg}$  = Throughput, gal/yr

% Recovered = Determined by Mass Balance

Equation and emission factors are from AP-42 for fuel dispensing operations.

c. Storage Tank Turnaround

$$L_{\text{Tank Turnaround}} = \{[(10,000 \times 12 + 80,000 \times 13) \times 42 \text{ gal/bbl}] / [34,000 \times 25]\} \times 5.1808 \times TC$$

Where:

$L_{\text{Tank Turnaround}}$  = Storage Tank Turnaround Emissions, lb/yr

$TC$  = Tank Cleanings Per Year

Equation is based on the assumption that 12 storage vessels with 10,000 bbl capacity and 13 storage vessels with 80,000 bbl capacity are cleaned annually.

d. Total fugitive VOM emissions is given by adding the values obtained in Conditions 7.6.12(a), (b), and (c).

7.7 Natural Gas Fired Boilers

7.7.1 Description

Boilers are used for space and tank heating at the source.

7.7.2 List of Emission Units and Pollution Control Equipment

Equipment	Description	Emission Control Equipment
Boiler #1	Cleaver Brooks. Maximum Heat Input Capacity: 10.3 mmBtu/hr	None
Boiler #2	Zurn. Maximum heat Input Capacity: 30.7 mmBtu/hr	None
Boiler #3	Babcock and Wilcox. Maximum Heat Input Capacity: 100.8 mmBtu/hr	None

7.7.3 Applicable Provisions and Regulations

- a. An affected boiler for the purpose of these unit specific conditions is a boiler that is fired with natural gas, with a maximum heat input capacity of less than 250 mmBtu/hr, but greater than or equal to 10 mmBtu/hr.

As of the "date issued" as shown on page 1 of this permit, the affected boilers are identified in Condition 7.7.2.

- b. A new affected boiler for the purpose of these unit specific conditions is a boiler that is fired with natural gas, with a maximum heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr, and constructed, modified or reconstructed after June 9, 1989. As a consequence, the affected boiler is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc because the boiler was constructed after June 9, 1989 and the firing rate of the affected boiler is less than 100 mmBtu/hr and greater than 10 mmBtu/hr.
- c. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel

combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

- d. The affected boilers are subject to the emission limits identified in condition 5.2.2.

#### 7.7.4 Non-Applicability of Regulations of Concern

- a. Each affected boiler is not subject to 35 IAC 217.141, because the actual heat input of each affected boiler is less than 73.2 MW (250 mmBtu/hr).
- b. Pursuant to 35 IAC 215.303, each affected boiler, i.e., fuel combustion emission unit, is not subject to 35 IAC 218.301, Use of Organic Material.

#### 7.7.5 Operational and Production Limits and Work Practices

Each affected boiler shall only be fired with natural gas.

#### 7.7.6 Emission Limitations

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

NO<sub>x</sub> Emissions from the Zurn boiler shall not exceed 39.9 T/yr.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1R].

The above limitations contain revisions to previously issued Permit 90090068. 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, oil fired backup limits were removed because the boiler is no longer permitted to fire with oil [T1R].

7.7.7 Testing Requirements

None

7.7.8 Monitoring Requirements

None

7.7.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1, 5.5.3 and 7.7.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for the boiler (gal/mo and gal/yr)
- b. Annual aggregate NO<sub>x</sub>, PM, and VOM emissions from the affected boilers, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.7.10 Reporting Requirements

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

- a. Emissions of CO from an affected boiler in excess of the limits specified in Condition 7.7.3(c) within 30 days of such an occurrence.
- b. Emissions of NO<sub>x</sub>, PM, or VOM from the affected boilers in excess of the 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.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

- a. Compliance with Condition 7.7.3(c) is demonstrated under inherent operating conditions of an affected boiler, so that no compliance procedures are set in this permit addressing this requirement.
- b. Compliance with the emission limits in Conditions 5.5.1, 5.5.3, and 7.7.6 shall be based on the recordkeeping requirements in Condition 7.7.9 and the emission factors and formulas listed below:
  - i. Emissions from the boilers burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> (lb/10 <sup>6</sup> ft <sup>3</sup> )
PM	1.9
SO <sub>2</sub>	0.6
VOM	5.5
NO <sub>x</sub>	100
CO	84

These are the emission factors for uncontrolled natural gas combustion in small boilers (<100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, March 1998.

Boiler Emissions (ton) = natural gas consumed multiplied by the appropriate emission factor/2000.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after \_\_\_\_\_ (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

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

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

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

### 8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

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

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

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

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- i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency (MC 40)  
Bureau of Air  
Compliance Section  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Eisenhower Tower  
1701 South First Avenue  
Maywood, Illinois 60153
  - iii. Illinois EPA - Air Permit Section (MC 11)  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506
  - iv. USEPA Region 5 - Air Branch  
  
USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

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

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

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

## 9.5 Liability

### 9.5.1 Title

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

### 9.5.2 Liability of Permittee

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

### 9.5.3 Structural Stability

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

### 9.5.4 Illinois EPA Liability

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

### 9.5.5 Property Rights

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

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

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

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

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

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

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

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
  - ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission

limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

- iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

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

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

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

##### 9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

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

#### 9.12.4 Duty to Provide Information

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

#### 9.13 Severability Clause

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

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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].

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10.0 ATTACHMENTS

10.1 Attachment 1 - List of Storage Tanks

TABLE 1-1

Tank #	Capacity (gal)	Date Constructed /Modified	Control	Applicable Condition	Associated Loading/ Unloading Rack
3-1	121,000	1969	None	7.1	27
3-2	105,100	1969/1990	IFR	7.2	27
4-2	153,500	1969/1988	IFR	7.2	27
5-1	207,400	1954	None	7.1	6
5-2	207,700	1954	None	7.1	6
5-3	206,900	1954	None	7.1	6
5-4	207,600	1951	None	7.1	6
5-5	207,600	1951	None	7.1	6
5-6	207,600	1951	None	7.1	6
5-7	207,600	1951	None	7.1	6
5-8	205,900	1951	None	7.1	6
5-9	206,700	1951	None	7.1	6
5-10	207,000	1951	None	7.1	6
5-11	206,500	1951	None	7.1	6
5-12	206,500	1954	None	7.1	28
5-13	187,400	1954	IFR	7.2	28
5-14	206,000	1955	None	7.1	28
5-15	187,700	1955	IFR	7.2	28
5-16	205,000	1955	None	7.1	28
5-17	206,000	1955	None	7.1	28
5-18	203,400	1955	None	7.1	28
5-19	206,200	1955	None	7.1	-
5-21	204,000	1971	None	7.1	36
10-1	408,900	1951	None	7.1	6
10-2	410,600	1961	None	7.1	6
10-3	409,900	1951	None	7.1	6
10-4	391,900	1951/1987	IFR	7.2	6
10-5	405,400	1952	None	7.1	15
10-6	410,800	1953	None	7.1	15
10-7	318,600	1953	None	7.1	15
10-8	316,800	1952	None	7.1	15
10-9	319,700	1952	None	7.1	15
10-10	319,900	1953	None	7.1	15
10-11	407,800	1952	None	7.1	36

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Tank #	Capacity (gal)	Date Constructed /Modified	Control	Applicable Condition	Associated Loading/ Unloading Rack
10-12	410,700	1954	Scrubber #2	7.1	31
10-14	409,500	1954	None	7.1	36
10-15	409,100	1954	None	7.1	36
10-16	410,100	1954	None	7.1	36
10-18	395,100	1956	IFR	7.2	28
10-19	409,000	1954	None	7.1	-
10-20	389,800	1955/nd	IFR	7.2	28
10-21	407,900	1955	None	7.1	28
10-22	410,900	1955	None	7.1	40
10-23	410,500	1956	None	7.1	40
10-24	409,800	1956	None	7.1	28
10-25	377,300	1956	IFR	7.2	28
10-26	408,800	1957	None	7.1	40
10-27	407,700	1957	None	7.1	40
10-28	408,600	1957	None	7.1	40
10-29	374,600	1957	None	7.1	40
10-30	409,300	1957	None	7.1	40
10-31	409,000	1957	None	7.1	40
10-32	409,500	1958	None	7.1	-
10-33	412,800	1958	None	7.1	-
15-1	629,700	1951	None	7.1	6
15-2	609,100	1951/1987	IFR	7.2	6
15-3	630,200	1953	None	7.1	34
15-5	629,800	1956	None	7.1	40
15-6	629,800	1957	None	7.1	40
20-1	817,800	1951	None	7.1	6
20-2	786,900	1951/1987	IFR	7.2	6
20-3	816,800	1951	None	7.1	6
20-4	787,800	1951/1986	IFR	7.2	6
20-5	817,300	1953	None	7.1	34
25-1	940,500	nd/1994	IFR	7.2	UCC
25-2	965,000	1952/1988	IFR	7.2	14
25-3	979,400	1952/1988	IFR	7.2	-
25-4	940,700	1952/1994	IFR	7.2	UCC
25-5	962,800	1952	IFR	7.2	-
25-6	940,600	1952/1994	IFR	7.2	UCC
25-7	975,200	1952/1986	IFR	7.2	34
25-8	1,015,400	1952	None	7.1	34
25-9	1,017,900	1953	See Note	7.1	28

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Tank #	Capacity (gal)	Date Constructed /Modified	Control	Applicable Condition	Associated Loading/ Unloading Rack
25-10	1,014,600	1954	None	7.1	28
25-11	1,017,100	1954	IFR	7.2	28
25-13	1,011,500	1955	None	7.1	-
25-14	1,011,100	1955	None	7.1	-
25-15	1,012,600	1955	None	7.1	-
25-16	1,017,300	1955	None	7.1	-
25-17	984,700	1955/1987	IFR	7.3	Gasoline
25-18	1,019,200	1955	None	7.1	Gasoline
25-21	974,800	1958	None	7.1	-
25-22	1,013,100	1956	None	7.1	-
25-23	1,017,700	1956	None	7.1	-
33-1	1,189,100	1957	None	7.1	-
33-2	1,208,700	1957	None	7.1	-
48-1	1,897,100	1958/1991	IFR	7.3	Gasoline
55-1	2,254,000	1951	None	7.1	8
55-2	2,227,000	1951	None	7.1	9
55-3	2,216,400	1951/1992	IFR	7.3	6
55-4	2,215,400	1951	None	7.1	10
55-5	2,256,900	1951	None	7.1	10
55-6	2,172,000	1956/1988	IFR	7.3	Gasoline
55-7	2,244,300	1956	None	7.1	-
55-8	2,251,100	1957	None	7.1	Gasoline
55-9	2,150,600	1958/1991	IFR	7.3	-
55-10	2,148,800	1958/1991	IFR	7.3	Gasoline
80-1	3,128,100	1952	None	7.1	10
80-2	3,144,100	1951/1991	IFR	7.2	10
80-3	3,283,200	1951	None	7.1	-
80-4	3,263,000	1956	None	7.1	-
80-5	3,261,400	1956/1999	IFR	7.2	-
80-6	3,017,500	1955/1992	IFR	7.2	-
1212	11,600	1955	None	7.1	Gasoline
2401	25,000	1969	None	7.1	27
2402	24,500	1969	None	7.1	27
2403	24,500	1969	None	7.1	27
2404	24,500	1969	None	7.1	27
5001-H	46,800	1961	Scrubber #1	7.1	44
5002-H	46,800	1961	None	7.1	44
5003-H	46,800	1961	None	7.1	44
5004-H	46,800	1961	Scrubber #1	7.1	44

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Tank #	Capacity (gal)	Date Constructed /Modified	Control	Applicable Condition	Associated Loading/ Unloading Rack
5005-H	40,300	1961	IFR	7.2	44
5006-H	46,800	1961	None	7.1	44
5007-H	40,500	1961	IFR	7.2	44
5008-H	46,800	1961	None	7.1	44
5009-H	46,400	1961	None	7.1	40
5010	49,500	1993	None	7.2	41
5011	49,600	1993	None	7.2	42
5012	49,600	1993	None	7.2	41
5013	49,700	1993	None	7.2	42
C-1	105,900	1952	None	7.1	6
C-2	105,800	1952	None	7.1	6
C-3	102,800	1952	None	7.1	6
C-10	104,400	1969/nd	IFR	7.2	Direct Transfer
C-11	103,400	1971	None	7.1	36
C-4H	96,700	1961	None	7.1	44
C-5H	97,500	1961	Scrubber #1	7.1	44
C-6H	97,200	1961	None	7.1	44
C-7H	97,500	1961	None	7.1	44
C-8H	78,900	1961	Scrubber #2	7.1	31
CL-1	150,700	1958	Scrubber #1	7.1	44
D-7	250,000	1954	None	7.1	-
D-8	60,000	1954	Scrubber #2	7.1	31
W-1	42,500	nd	None	7.1	4
W-2	42,500	nd	None	7.1	4
WT-1	10,000	nd	None	7.1	Direct Transfer
WT-2	10,000	nd	None	7.1	Direct Transfer
E-10	49,300	1987	None	7.2	Eastman
E-11	9,100	1987	None	7.2	Eastman
E-12	29,000	1987	None	7.2	Eastman
E-13	48,900	1987	IFR	7.2	Eastman
E-14	36,800	1987	None	7.2	Eastman
E-15	49,500	1987	None	7.2	Eastman
E-16	48,400	1987	IFR	7.2	Eastman
E-17	48,400	1987	IFR	7.2	Eastman
E-18	48,900	1987	IFR	7.2	Eastman
E-19	49,600	1987	None	7.2	Eastman
E-20	49,500	1987	None	7.2	Eastman

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Tank #	Capacity (gal)	Date Constructed /Modified	Control	Applicable Condition	Associated Loading/ Unloading Rack
E-21	48,300	1987	IFR	7.2	Eastman
E-22	48,300	1987	IFR	7.2	Eastman
E-23	49,600	1987	None	7.2	Eastman
E-24	49,600	1987	None	7.2	Eastman
E-25	48,400	1987	IFR	7.2	Eastman
E-26	48,400	1987	IFR	7.2	Eastman
E-27	49,500	1987	None	7.2	Eastman
E-28	48,400	1987	IFR	7.2	Eastman
E-29	48,400	1987	IFR	7.2	Eastman
E-30	49,300	1987	None	7.2	Eastman
E-31	49,300	1987	None	7.2	Eastman
E-32	49,300	1987	None	7.2	Eastman
E-33	49,300	1987	None	7.2	Eastman
E-34	49,200	1987	None	7.2	Eastman
E-35	49,400	1987	None	7.2	Eastman
E-36	49,300	1987	None	7.2	Eastman
E-37	49,200	1987	None	7.2	Eastman
E-38	49,200	1987	None	7.2	Eastman
E-39	49,300	1987	None	7.2	Eastman
E-40	49,400	1987	None	7.2	Eastman
E-41	49,500	1987	None	7.2	Eastman
E-42	49,300	1987	None	7.2	Eastman
E-43	49,300	1987	None	7.2	Eastman
E-44	49,300	1987	None	7.2	Eastman
E-45	49,400	1987	None	7.2	Eastman
E-47	51,000	1993	None	7.2	Eastman
E-48	49,300	1987	None	7.2	Eastman
E-49	49,300	1987	None	7.2	Eastman
UC TOTE-1	500	1994	None	7.2	UCC
UC TOTE-2	500	1994	None	7.2	UCC
UC TOTE-3	500	1994	None	7.2	UCC
UC TOTE-4	500	1994	None	7.2	UCC
UC TOTE-5	500	1994	None	7.2	UCC
UC TOTE-6A	500	1994	None	7.2	UCC
UC TOTE-6B	500	1994	None	7.2	UCC
UC TOTE-7	500	1994	None	7.2	UCC
UC TOTE-8A	500	1994	None	7.2	UCC
UC TOTE-8B	500	1994	None	7.2	UCC
UC TOTE-8C	500	1994	None	7.2	UCC

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Tank #	Capacity (gal)	Date Constructed /Modified	Control	Applicable Condition	Associated Loading/ Unloading Rack
UC TOTE-8D	500	1994	None	7.2	UCC
UC-1	70,000	1994	VCU	7.2	UCC
UC-2	70,000	1994	None	7.2	UCC
UC-3	70,100	1994	None	7.2	UCC
UC-4	70,000	1994	VCU	7.2	UCC
UC-5	70,000	1994	VCU	7.2	UCC
UC-6	70,000	1994	None	7.2	UCC
UC-7	70,000	1994	None	7.2	UCC
UC-8	70,000	1994	VCU	7.2	UCC
UC-9	70,000	1994	None	7.2	UCC
UC-10	70,000	1994	None	7.2	UCC
UC-11	70,000	1994	VCU	7.2	UCC
UC-12	70,000	1994	VCU	7.2	UCC
UC-13	70,000	1994	None	7.2	UCC
UC-14	70,000	1994	None	7.2	UCC
UC-15	70,000	1994	None	7.2	UCC
UC-16	70,000	1994	VCU	7.2	UCC
UC-17	70,000	1994	VCU	7.2	UCC
UC-18	70,000	1994	VCU	7.2	UCC
UC-19	70,000	1994	VCU	7.2	UCC
UC-20	70,000	1994	VCU	7.2	UCC
UC-21	70,000	1994	None	7.2	UCC
UC-22	70,000	1994	VCU	7.2	UCC
UC-23	70,000	1994	None	7.2	UCC
UC-24	70,000	1994	VCU	7.2	UCC
UC-25	70,000	1994	None	7.2	UCC
UC-26	70,000	1994	VCU	7.2	UCC
UC-27	70,000	1994	None	7.2	UCC
UC-28	70,000	1994	VCU	7.2	UCC
UC-29	70,000	1994/1998	VCU	7.2	UCC
UC-30	70,000	1994	None	7.2	UCC
UC-31	70,000	1994	None	7.2	UCC
UC-32	70,000	1994	None	7.2	UCC
UC-33	70,000	1994	None	7.2	UCC
UC-34	70,000	1994	None	7.2	UCC
UC-37	70,000	1994	None	7.2	UCC
UC-38	70,000	1994	None	7.2	UCC
UC-101	9,500	1994	VCU	7.1	UCC
UC-102	6,600	1994	VCU	7.1	UCC

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Tank #	Capacity (gal)	Date Constructed /Modified	Control	Applicable Condition	Associated Loading/ Unloading Rack
K-250	250	1994	VCU	7.1	UCC
K-500	500	1994	VCU	7.1	UCC

Note: Tank 25-9 has been issued Construction/Operating Permit 99060041 to add an internal floating roof to the existing tank, however, at the time of issuance of this permit, the IFR had not yet been installed.

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: \_\_\_\_\_

YY:jar

I. INTRODUCTION

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

The GATX Terminals Corporation - Argo Terminal is located at 8500 W. 68th Street, Argo, Illinois. The source is a bulk storage facility.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
See Attachment 1	Storage Tanks Not Subject To NSPS And Not Storing Gasoline Products	See Attachment 1	See Attachment 1
See Attachment 1 of CAAPP Permit	Storage Tanks Subject to NSPS and not Storing Gasoline Products	See Attachment 1 of CAAPP Permit	See Attachment 1 of CAAPP Permit
See Attachment 1 of CAAPP Permit	Storage Tanks not Subject to NSPS and Storing Gasoline Products	See Attachment 1 of CAAPP Permit	See Attachment 1 of CAAPP Permit
See Attachment 1 of CAAPP Permit	Storage Tanks Subject to NSPS and Storing Gasoline Products	See Attachment 1 of CAAPP Permit	See Attachment 1 of CAAPP Permit
Docks 1, 2, and 3	Marine Loadout		None
Loading Racks	Railcar and Tank Truck Loading/Unloading	See Attachment 1 of CAAPP Permit	VAS, Tank Accumulator, VCU, and/or Scrubbers
Equipment Leaks	Fugitive VOM Emissions	---	---
3 Natural Gas-Fired Boilers	100, 30.7, and 10.3 mmBtu/Hr	1983, 1990, 1978	None

III. EMISSIONS

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

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	327.60
Sulfur Dioxide (SO <sub>2</sub> )	0.21
Particulate Matter (PM)	4.13
Nitrogen Oxides (NO <sub>x</sub> )	95.64
HAP, not included in VOM or PM	11.23
TOTAL	438.81

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

IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

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

Title I

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

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

VI. REQUEST FOR COMMENTS

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

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

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