

PROPOSED PERMIT
Panhandle Eastern Pipe Line Company
I.D. No.: 149820AAB
Application No.: 95120052
October 29, 1999

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Panhandle Eastern Pipe Line Company
4 1/2 Mile Southeast of Atlas on Highway 96,
Pleasant Hill, Illinois 62366
217/734-2319

I.D. No.: 149820AAB

Standard Industrial Classification: 4922, Natural Gas Transmission

1.2 Owner/Parent Company

Panhandle Eastern Pipe Line Company
Post Office Box 4967
Houston, Texas 77210-4967

1.3 Operator

Panhandle Eastern Pipe Line Company
4 1/2 Mile Southeast of Atlas on Highway 96,
Pleasant Hill, Illinois 62366

Contact Person's Name:
Charles Wait, Senior Engineer
713/989-7464

1.4 General Source Description of Source

The Panhandle Eastern Pipe Line Company - Pleasant Hill Compressor Station is located in a rural location 4 1/2 Miles Southeast of Atlas on Highway 96 in rural Pleasant Hill, Illinois. The source utilizes large compressors driven by natural gas fired reciprocating engines to recompress and move natural gas through transmission pipelines. The primary sources of pollutants at this source are the natural gas fired reciprocating engines that power the compressors.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
°C	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
°F	degrees Fahrenheit
ft	feet
ft ³	cubic foot
gm/hp-hr	gram per horsepower hour
g	grams
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant
Hp	Horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
lb	pound
lb/hp-hr	pound per horsepower hour
LEL	Lower Explosive Limit
m	meter
MACT	Maximum Achievable Control Technology
MBtu	Million Btu
mg	milligrams
mmHg	millimeters of mercury
mmscf	million standard cubic feet
mo	month
MW	Megawatts

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NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NO _x	Nitrogen Oxides
PM	Particulate Matter
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Tons
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
Wt	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Methanol Storage Tank

- 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:

- a. 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 MBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 MBtu/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)].
- b. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons provided the tank is not used for the storage of gasoline or any listed hazardous air pollutant pursuant to Section 112(b) of the Clean Air Act [35 IAC 201.210(a)(10)].

- c. Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].
- d. Gas turbines and stationary reciprocating internal combustion engines of between 112 KW and 1,118 KW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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.

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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).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date of Construction	Emission Control Equipment
Unit 01 Internal Combustion Engines	Six (6) Reciprocating Engines (Worthington, Model 24 x 36 TC, 1,800 HP each, ##1001-1006)	<u>1936</u> - 1003, 1004 <u>1937</u> - 1001, 1002, 1005, <u>1941</u> - 1006	None
	Six (6) Reciprocating Engines (Clark, Model RAS-8, 800 HP each, ##1007-1012)	<u>1943</u> - <u>1945</u>	None
	Two (2) Reciprocating Engines (Cooper-Bessemer, Model GMW 10, 2,400 HP each, ##1013-1014)	<u>1947</u> - 1013 <u>1950</u> - 1014	None
	Three (3) Reciprocating Engines (Cooper-Bessemer, Model GMW 10, 3,400 HP each, ##1015-1017)	<u>1963</u> - 1015 <u>1964</u> - 1016 <u>1966</u> - 1017	None
Unit 02	Fugitive Losses from Leaking Piping Components	N/A	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x, VOM, CO and HAP's 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 emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123 (b) and 35 IAC 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 Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.5. Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as 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

<u>Pollutant</u>	<u>Tons/Year</u>
Volatile Organic Material (VOM)	147.37
Sulfur Dioxide (SO ₂)	1.69
Particulate Matter (PM)	9.83
Nitrogen Oxides (NO _x)	3,472.82
HAP, not included in VOM or PM	----
TOTAL	3,631.71

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emissions for HAP 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

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, or Section 502(b) (10) of the CAA.

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 within 24 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 Annual Emissions Report

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

- 5.7.2 The Permittee shall promptly notify the Illinois EPA if the emissions exceed the limits in Condition 5.5.1 and appropriate unit-specific conditions of Section 7.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

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5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements, and Compliance Procedures in Section 7 (Unit-Specific Conditions) of this permit.

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6.0 [NOT APPLICABLE TO THIS PERMIT]

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 - Natural Gas Fired Internal Combustion Engines

7.1.1 Description

The Permittee operates 2-cycle lean burn and 4-cycle lean burn natural gas fired internal combustion engines which provide power to compressor units at the source that move natural gas through the source's associated transmission pipelines. The principle source of emissions is the engines exhaust. "Blowdown Emissions" also occur during the venting of pressurized natural gas from the compressors and engines after shutdown for safety reasons.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date of Construction	Emission Control Equipment
Unit 01 Internal Combustion Engines	Six (6) Reciprocating Engines (Worthington, Model 24 x 36 TC, 1,800 HP each, ##1001-1006)	<u>1936</u> - 1003, 1004 <u>1937</u> - 1001, 1002, 1005, <u>1941</u> - 1006	None
	Six (6) Reciprocating Engines (Clark, Model RAS-8, 800 HP each, ##1007-1012)	<u>1943</u> - <u>1945</u>	None
	Two (2) Reciprocating Engines (Cooper-Bessemer, Model GMW 10, 2,400 HP each, ##1013-1014)	<u>1947</u> - 1013 <u>1950</u> - 1014	None
	Three (3) Reciprocating Engines (Cooper-Bessemer, Model GMW 10, 3,400 HP each, ##1015-1017)	<u>1963</u> - 1015 <u>1964</u> - 1016 <u>1966</u> - 1017	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected engine" for the purpose of these unit specific conditions, is a natural gas fired internal combustion which provides power to compressor units at the source.
- b. Each affected engine is subject to 35 IAC 215.301 and is not allowed to discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere.

7.1.4 Non-Applicability of Regulations of Concern

- a. Each affected engine is not subject to the requirements of 35 IAC 212.322 because it does not have a process weight rate as defined in 35 IAC 211.5250.
- b. Each affected engine is not subject to the requirements of 35 IAC 215.143 because the blowdown emissions associated with engines are not considered to be vapor blowdown pursuant to 35 IAC 215.143.

7.1.5 Operational and Production Limits and Work Practices

- a. Natural gas shall be the only fuel used in the engines.
- b. Startup Provisions

The Permittee is authorized to operate the engines during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

- i. This authorization only extends for a period of up to two-hours following initial firing of natural gas during each startup event for each engine.

- ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups and minimize the frequency of startups:

Implementation of established startup procedures, including preheating an engine prior to startup when sufficient time is available.

7.1.6 Emission Limitations

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

None

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

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 all engines to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Annual aggregate NO_x, PM, SO₂, and VOM emissions from the engines, based on hours of operation and the applicable emission factors, with supporting calculations;
- b. Hours of operation for each engine per year; and
- c. Number of startups totaled per month and per year for each engine.

7.1.10 Reporting Requirements

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

- a. The total emissions of NO_x, PM, SO₂, and VOM from the engines in excess of the limits specified in Condition 5.5.1 and calculated by using emission factors and equation from Condition 7.1.12 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.
- b. Reporting for Startups of Engines

The Permittee shall provide an annual report, submitted with the Annual Emission Report, to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to Section 39.5(7)(b) of the Act, concerning startup of engines. At a minimum, this report shall include:

For each engine, the total number of startups.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(b) is assumed to be achieved by the work-practices inherent in the operation of natural gas-fired engines, so that no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with the emission limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.1.9 and calculated based on the emission factors and formulas listed below:

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i. Blowdown Emissions

10,000 scf/blowdown x 1.082 lb VOM/mmscf x
mmscf/1000 scf = 10.82 lb VOM/blowdown/engine

VOM emissions (lb/yr) = 10.82 lb VOM/blowdown
per engine x 75 (number of blowdowns/engine)

VOM Emissions = 75 (number of blowdown

ii. Hourly Emission Factors (lb/hr, each engine)

Pollutants	Engines 1001-1006	Engines 1013-1014	Engines 1015-1017
NO _x	47.58	105.73*	112.33*
VOM	2.85	2.64*	3.74*
Pollutants	Engines 1001-1006	Engines 1013-1014	Engines 1015-1017
PM	0.19	0.21	0.28
SO ₂	0.03	0.04	0.05
Formaldehyde	0.56*	0.95*	1.35*

* Emission factor is based on the manufacturer's emission factor or results of GRI studies (for formaldehyde)

Emission factors other than marked *) are based on the standard emission factors from AP-42.

Engines 1007-1012 are not in service for the last ten years and Permittee requests that standard emission factors from AP-42 for all air pollutants may be applied.

7.2 Unit 02 - Fugitive Losses from Leaking Piping Components

7.2.1 Description

Equipment and pipeline components (i.e., valves, flanges, relief valves, compressor seals, etc.) At the source that have the potential to leak natural gas and as a result VOM emissions.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 02	Valves, Flanges, Relief Valves, Compressor Seals	None

7.2.3 Applicability Provisions and Applicable Regulations

An "affected leaking piping components" for the purpose of these unit specific conditions, is each leaking pressure relief device, open-ended valve or line, valve, flange or other pipeline connector that is in service at this natural gas pumping station.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected leaking piping components are not subject to the requirements of 35 IAC 215.142 because the natural gas compressors are not used to compress volatile organic liquids.
- b. The affected leaking piping components are not subject to the requirements of 35 IAC 215.143 because, pursuant to the definition in 35 IAC 211.2090, the safety relief valves are not capable of causing an excessive release.
- c. The affected leaking piping components are not subject to the requirements of 40 CFR 60 Subpart KKK "Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants" because

this source is not a "natural gas processing plant",
as defined in 40 CFR 60.631.

7.2.5 Operational and Production Limits and Work Practices

N/A

7.2.6 Emission Limitations

N/A

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

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 all affected components to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(a) and (b) of the Act:

Amount of:

- a. Valves;
- b. Flanges and Screwed Fittings;
- c. Relief Valves; and
- d. Compressor Seals

7.2.10 Reporting Requirements

None

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.5.1 of this permit shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. For purpose of estimating fugitive VOM emissions from leaking piping components at the source, the following emission factors shall be used:

<u>Piping Component</u>	<u>Natural Gas Emissions Lb/hr/component¹</u>	<u>VOM Emissions Lb/hr/component²</u>
Valve	0.044	0.0012
Flanges and Screwed Fittings	0.00242	0.0001
Relief Valves	0.414	0.011
Compressor Seals	0.449	0.012

¹ The emission factors for natural gas emissions are the factors found in USEPA guidance document EPA-453/R-93-026.

² The emission factors for VOM emissions are the emission factors for natural gas emissions found in the USEPA guidance document EPA-453/R-93-026 and multiplied by the fraction of VOM in Natural Gas (i.e., 0.0265).

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 the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after September 7, 1999 unless the 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, or 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. 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 process, emissions, or composition 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 or 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 the 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 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 on an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in the 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:

- 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.

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8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

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

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

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

iv. USEPA - Air Branch

United States EPA (AR - 17J)
Air & Radiation Branch (Illinois - Indiana)
77 W. 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.

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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 the 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 Clean Air Act, 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 Clean Air Act; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- 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 the permit. Any permit noncompliance constitutes a violation of the Clean Air Act 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 Environmental Protection Act or regulations promulgated thereunder.

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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)] 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 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 the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, operations regulated or required under the 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 this 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

The permit does not convey any property rights of any sort, or any exclusive privilege.

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.

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 the 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 the 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 must 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 a CAAPP permit shall contain certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(k) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defenses to Enforcement Action

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 operation logs, or other relevant evidence:

- i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 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 day 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 the permit.
- b. This provision is in addition to any emergency or upset provisions 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 the 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 the permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

The 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

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

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misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(a)(iii) 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 the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by the 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 the permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(1) and (n) of the Act]

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10.0 ATTACHMENTS

10.1 Attachment 1 - 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: _____

AB:psj