FINAL DRAFT/PROPOSED CAAPP PERMIT
BASF Corporation
I.D. No.: 097035AAQ
Application No.: 96030159
July 11, 2001

217/782-2113

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

PERMITTEE

BASF Corporation
Attn: David L. Van Lewen
3938 Porett Drive
Gurnee, Illinois 60031-1281

Application No.: 96030159 I.D. No.: 097035AAQ
Applicant's Designation: Date Received: December 20, 2000
Operation of: Surfactant Manufacturing Plant
Date Issued: !TO BE DETERMINED! Expiration Date[2]: !DATE!
Source Location: 3938 Porett Drive, Gurnee, Lake County
Responsible Official: Tomas W. O'Rourke, Site Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a surfactant manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:DGP:psj

cc: Illinois EPA, FOS, Region 1

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

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

BASF Corporation
3938 Porett Drive
Gurnee, Illinois 60031-1281
847/249-6360

I.D. No.: 097035AAQ
Standard Industrial Classification: 2843, Surface Active Agents

1.2 Owner/Parent Company

BASF Corporation
3000 Continental Drive North
Mount Olive, New Jersey 07828

1.3 Operator

BASF Corporation
3938 Porett Drive
Gurnee, Illinois 60031-1281

David Van Lewen, manager, Safety and Ecology
847/249-6360

1.4 General Source Description

The BASF Corporation is located at 3938 Porett Drive in Gurnee. The source manufactures surface active agents. In addition, the source operates boilers and oil heaters for use in the process manufacturing operations.

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
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
EO	Ethylene Oxide
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft^3	cubic feet
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
Kg	Kilogram
kW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
LDAR	Leak Detection and Repair
MACT	Maximum Achievable Control Technology
Mg	Megagram
min	Minute
mmBtu	Million British thermal units
mo	month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods

PO	Propylene Oxide
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
scf	standard cubic feet
SIC	Standard Industrial Classification
SO_2	Sulfur Dioxide
SOCMI	Synthetic Organic Chemical Manufacturing Industry
T	Ton
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
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:

Equipment Identification	Description
T48	Cresol Storage Tank (13,000 gal)

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:

Equipment Identification	Description
	Permeate Tanks
	South Pit
	UF Sump Exhaust Fan
	North Pit
	Vessel Air Sweep Exhaust Fan
	Vessel Air Sweep Exhaust Fan
	Vessel Air Sweep Exhaust Fan
	Hot Well Vent
	Trash Compactor
	Vessel Air Sweep Exhaust Fan
E15	Cooling Tower
E16	Cooling Tower (Marley)
E17	Cooling Tower
HW1	Hot Well Exhaust Fan
HW2	Hot Well
HW3	Hot Well Vent
HW4	Hot Well
HW5	Hot Well
R38	Reactor R-38
BPA	Bisphenol Handling System[a]
R-24	Bisphenol Melting System
T135	Storage Tank
T136	Storage Tank

[a] Although this unit is equipped with a control device, the emissions would be less than specified in 35 IAC 201.211(a)(2) in the absence of the control device.

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)].

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

Storage tanks of 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)].

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

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

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/Group	Description	Date Constructed	Emission Control Equipment
B1 & 2[a]	Eclipse Steam Boiler (21 mmBtu/Hr, Each)	1977/79	None
B3[a]	VA Power Oil Heater (13.3 mmBtu/Hr)	1980	None
B4[a]	Eclipse Thermal Oil Heater (7.0 mmBtu/Hr)	1975	None
B5[a]	CB Steam Boiler (20.9 mmBtu/Hr)	1986	None
B7[a]	Eclipse Steam Boiler (7.5 mmBtu/Hr)	1974	None
B8[a]	VA Power Oil Heater (12.00 mmBtu/Hr)	2001	None
G02	R1-R5, R7 Alkoxylation	Pre-1989	Scrubber (R37)
G02	V-52, 53 EO/PO Vapor Tanks T-101, 103 EO/PO Storage Tanks (30,000 Gal Each)	Pre-1989	Scrubber (R37)
G03	R22, 23, 29 West Esterification Reactors, Recovery Condenser and Flaker	Pre-1989	None
G04	Reactors R8, 9, 15, 17, 19 Finish Tank F1-F5 (Also Called R30 - R34 East Esterification/Finishing/ Special Projects	Pre-1989	Condensers
G05	R16, 20, 26, 28 West Building Multi-Use Reactors Silicone Fluids/Silicone Textile Softeners/Silicone and Organic Defoamers	Pre-1989	None
G06	R18 West Building	Pre-1989	Condenser
G07	R21 West Building	Pre-1989	No Process Vents
G08	R36, T50, T11 and T123 Wastewater Concentrator	1990	Condenser or R36 and T50
EO/PO Storage and Delivery System	Fugitive Emissions	----	LDAR

[a] All boilers/heaters combined are Group 1 (G01)

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

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

5.2 Applicable Regulations

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

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

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

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

b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Ozone Depleting Substances

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

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

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

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

5.2.4 Risk Management Plan

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

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

c. As part of the compliance certification submitted under Section 9.8, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, shall be submitted.

5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation

which was promulgated after the date issued of this permit.

5.2.7 Episode Action Plan

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

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

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

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

i. Illinois EPA, Compliance Section; and

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

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

5.3 Non-Applicability of Regulations of Concern

This permit is issued based on the affected chemical processes not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each individual affected process does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	49.3
Sulfur Dioxide (SO_2)	0.3
Particulate Matter (PM)	6.2
Nitrogen Oxides (NO_x)	63.0
HAP, not included in VOM or PM	-----
TOTAL	118.8

5.5.2 Emissions of Hazardous Air Pollutants

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

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the vapor weight percent of each HAP in the VOM emissions for each organic material and the VOM calculated as described in Condition 7.2.12.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR Part 63, Subpart PPP, National Emission Standards for Polyether Polyol, do not apply to the source.

See Condition 7.2.3(e) which imposes an LDAR program to assure compliance with this limit.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 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 deviations of the source 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.

5.7.3 Annual Reporting of HAP Emissions

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

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

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

month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

c. The monthly running totals specified in (a) and (b) above are not required if the annual totals are less than one-half of the major source quantity, i.e. less than 5 tons/yr of an individual HAP and less than 12.5 tons/yr of all HAPs combined.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM and HAP 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.

a. For the purpose of estimating fugitive VOM emissions from equipment leaks at the source, the emission factors found in “AP-42, Compilation of Emission Factors”, and/or EPA-453R/-050-017, “Protocol for Equipment Leaks”, published in 1995, are acceptable.

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

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. 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 in the sources’ CAAPP permits. These allotments are established from historical VOM emissions or “baseline emissions” lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

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

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

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:

i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;

ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and

iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.

b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Fuel Combustion Units
Control None

7.1.1 Description

The fuel combustion units are all gas-fired. The unit described as an “oil heater” means that the heat transfer medium is oil and not steam.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
B1 & 2	Eclipse Steam Boiler (21 mmBtu/hr, each)	None
B3	VA Power Oil Heater (13.3 mmBtu/hr)	None
B4	Eclipse Thermal Oil Heater (7.0 mmBtu/hr)	None
B5	CB Steam Boiler (20.9 mmBtu/hr)	None
B7	Eclipse Steam Boiler (7.5 mmBtu/hr)	None
B8	VA Power Oil Heater (12.0 mmBtu/Hr)	None

7.1.3 Applicability Provisions and Applicable Regulations

a. An “affected fuel combustion unit” for the purpose of these unit-specific conditions, is a unit that supplies process heat by burning natural gas to create steam or a hot oil. The affected units are listed in Condition 7.1.2.

b. The affected fuel combustion unit is subject to the emission limits identified in Condition 5.2.2.

c. Emission Units B1, B2, B3, B5 and B8 are subject to 35 IAC 216.121. This rule states that emissions of CO shall not exceed 200 ppm.

d. The two VA oil heaters (B3 and B8) are subject to 40 CFR 60 Subpart Dc because they are larger than 10 mmBtu/hr and constructed after June 9, 1989. However, since they only burn natural gas they are

only subject to the recordkeeping requirements of the NSPS. See Condition 7.1.9.

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected B1, B2, B4, B5 and B7 fuel combustion units not being subject to the New Source Performance Standards (NSPS) for Small Industrial Steam Generating Units, 40 CFR Part 60, Subpart Dc, because all of the affected units other than the VA oil heaters were constructed prior to the applicable date of June 9, 1989.

b. Boilers B4 and B7 are not subject to 35 IAC 216.121 because the rule only applies to fuel combustion units with a firing rate greater than 10 mmBtu/hr and B4 and B7 have a firing rate below 10 mmBtu/hr.

7.1.5 Control Requirements

None

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected VA power oil heater is subject to the following:

Emissions from each of the affected VA oil heaters (B3 and B8) shall not exceed the following limits:

NO_x Emissions	
(Lb/Hour)	(Ton/Year)
1.77	7.73

These limits are based on the maximum rate.

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 limitation for B3 was established in Permit 89110043, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to

Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

The above limitation for B8 contains a revision to previously issued Permit 99100090. 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 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the original permit was for a 20 mmBtu/hr heater and the unit built was smaller (12 mmBtu/hr) and consequently with lower emissions. The heater was also assigned a different identification. Originally called B4X it is now B8.

7.1.7 Operating Requirements

None

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers or heaters to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. Gas usage may be for all units combined (scf/mo or mmBtu/mo); and

b. Records that show that no fuel oil was combusted in the VA oil heaters.

7.1.10 Reporting Requirements

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

Annual NO_x emissions exceed the amount allowed in Condition 5.5.1.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

a. Normal operations of the boilers and heaters assures compliance with all requirements.

b. To determine compliance with Condition 5.5.1 emissions from the natural gas fired equipment shall be based on the emission factors listed below:

Pollutant	Natural Gas Emission Factors for Boilers ($lb/10^6\ ft^3$)
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in boilers, Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement D, March, 1998.

Boiler Emissions (lb) = (Natural Gas Consumed, ft^3) x (The Appropriate Emission Factor)

7.2 Unit: Chemical Manufacturing Operations
Control: Scrubber and Condensers

7.2.1 Description

Although these processes are put in groups depending upon the type of chemical reaction occurring, a majority of the processes have a reactor vented through a condenser to a vacuum system. The alkoxylation process vents to a scrubber.

These products all have low vapor pressure and some are even solids after cooling. The raw materials are usually higher vapor pressure and may even be HAPs. One process forms methanol as a byproduct that must be disposed of.

The wastewater concentrator evaporates water so that materials that are disposed of have a reduced volume.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit Group No. l	Description Reactor Identification and Type of Reaction	Emission Control Equipment
G02	R1-R5, R7 Alkoxylation	Scrubber (R37)
G02	V-52, 53 EO/PO Vapor Tanks T-101,103 EO/PO Storage Tanks (30,000 gal each)	Scrubber (R37)
G03	R22, 23, 29 West Esterification Reactors, Recovery Condenser and Flaker	None
G04	Reactors R8, 9, 15, 17, 19 Finish Tank F1-F5 (Also Called R30 - R34 East Esterification/Finishing/ Special Projects	Condensers
G05	R16, 20, 26, 28 West Building Multi-Use Reactors Silicone Fluids/Silicone Textile Softeners/Silicone and Organic Defoamers	None
G06	R18 West Building	Condenser
G07	R21 West Building	No Process Vents
G08	R36, T50, T11 and T154 Wastewater Concentrator	Condensers or: R36, T50 and T154
EO/PO Storage and Delivery System	Fugitive Emissions	LDAR

7.2.3 Applicability Provisions and Applicable Regulations

a. The "affected chemical processes (G02-G07)" for the purpose of these unit-specific conditions, are chemical processes that meet the definition of miscellaneous organic chemical manufacturing processes as defined in 35 IAC 211.3890 and thus subject to 35 IAC 218 Subpart RR. The definition also states that the use and handling of organic liquids and other substances for clean-up operations associated with the manufacturing process are included in the rule and thus the G08 wastewater concentrator is also regulated by § 218 Subpart RR.

This rule requires that an emissions capture and control system achieve an overall reduction in VOM emissions of 81% [35 IAC 218.966(a)] and the leak from components requirements of 35 IAC 218.966(c) as described in Condition 7.2.3(b) below, or pursuant to 218.960(d) be an emission unit whose VOM emissions not complying with § 218.966 do not exceed 1.0 ton/calendar year provided that total VOM from all such emission units not complying with § 218.966 not exceed 5.0 ton/calendar year.

The Permittee has selected the alternative to comply as follows:

Unit Group	Compliance Method (35 IAC)
G02	218.966(a) and (c)
G03	218.960(d)
G04	218.966(a) and (c)
G05	218.960(d)
G06	218.966(a) and (c)
G07	218.960(d)
G08	218.966(a) and (c)

b. In addition to the vent control requirements of Section 218.966(a), any leaks from component subject to the just referenced control requirements shall comply with the following measures:

Repair any component from which a leak of VOL can be observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found, unless the leaking component cannot be repaired until

the process unit is shut down, in which case the leaking component must be repaired before the unit is restarted [35 IAC 218.966(c)].

VOL is defined as any liquid which contains a VOM. For purposes of defining if a liquid is a VOL, the definition of Heavy Liquid in 35 IAC 211.2870 may be used. That is a heavy liquid is not a VOL.

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

d. The flaker is subject to 35 IAC 212.321. This rule is written out in Attachment 1.

e. An LDAR program is conducted by the Permittee on components which contain ethylene oxide or propylene oxide (i.e., G02) to verify that fugitive emissions do not classify the source as major for HAPs. The specific program chosen by the Permittee is to comply with the equipment leaks provisions of 40 CFR 63, Subpart H.

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the source not being subject to an NSPS, 40 CFR Part 60, Subpart NNN (SOCMI Distillation Operations) or Subpart RRR (SOCMI Reactor Processes), because this source is a specialty chemical producer and none of the chemicals manufactured at the source are listed in 40 CFR Part 60.697 or 60.707. In addition, the cited NSPS do not apply to batch reactors and batch distillation units and the source operates only batch systems.

b. This permit is issued based on the affected chemical processes not being subject to 35 IAC 218.301, because the affected chemical processes individually emit at low emission rates, less than 2.0 lb/hr and a majority of the VOMs emitted are not photochemically reactive pursuant to the definition in 35 IAC 211.4690. The two chemicals that are photochemically reactive are also HAPs and are vented through a highly efficient scrubber. Post control emissions are less than 0.5 lb/hr. The pre-control emissions are likely below 8 lb/hr.

c. This permit is issued based on the affected chemical manufacturing processes not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because each individual

affected chemical process does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

d. The ethylene oxide and propylene oxide storage and vapor tanks are pressurized tanks that vent to the scrubber and thus are not subject to 35 IAC 218 Subpart B.

e. This permit is issued based on all of the processes not being subject to 35 IAC 218 Subpart V, Batch Operations, because the Permittee operates under SIC Code 2843 and 35 IAC 218.501 states that the batch rule only applies to certain SIC Codes and 2843 is not one of them.

7.2.5 Control Requirements and Work Practices

a. The scrubber shall be operated to reduce VOM emissions by at least 81% so as to comply with Condition 7.2.3(a) and 35 IAC 218.966(a).

b. The condensers on units that comply under 35 IAC 218.966(a) as outlined in Condition 7.2.3(a) shall be operated to reduce emissions by 81%.

c. The condensers on units that comply under the exemption requirements of 35 IAC 218.960(d) as outlined in Condition 7.2.3(a) shall be operated to assure that annual VOM emissions from each unit do not exceed 1.0 tons/yr and VOM emissions from all such units combined do not exceed 5.0 tons/yr or more stringent limits if listed in Condition 7.2.6.

7.2.6 Emission Limitations

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

Emissions from the affected emission units shall not exceed the following limits:

Emission Unit	Emission Limit (Lb/Hr)	(Ton/Yr)	Permit No.
R8	0.1	0.44	89120030
R9	0.1	0.44	89120030
R15	0.1	0.44	89120030
R17	0.1	0.44	89120030

Emission Unit	Emission Limit		Permit No.
R19	0.1	0.44	89120030
F1 (R30)	0.1	0.44	89120030
F2 (R31)	0.1	0.44	89120030
F3 (R32)	0.1	0.44	89120030
F4 (R33)	0.1	0.44	89120030
F5 (R34)	0.1	0.44	89120030
R16			89120013
R20			89120013
R-21	0.1	0.44	96020060
R-18		9.33	T1R
R37[a]	0.5	2.19	T1N

[a] Control device for R1-R5, R7

Compliance with annual limits shall be determined on an annual basis. [T1 or as noted in Table].

The above limitations were established in the Permit indicated in the table, 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].

The above limitation for R18 contain revisions to previously issued Permit 89120013. 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. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the Permittee has requested a major reduction from 39.3 tons/yr to 9.33 tons/yr.

The above limitation for R-37 is being established in this permit pursuant to Title I of the CAA,

specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the VOM emissions from the affected G02 system below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application. This new limit assures that the process is not subject to a NESHAP. [T1N].

7.2.7 Testing Requirements

a. Upon request by the Illinois EPA, the scrubber shall be tested to verify the 81% VOM control efficiency required to comply with Condition 7.2.3(a). The testing shall be done using standard USEPA test methodology.

b. Each day that any of the reactors will be used, the scrubber shall have the pH and glycol content measured. If outside established range, the scrubbant shall be replaced with fresh material or adjusted to be within the established range.

7.2.8 Monitoring Requirements

a. The wet scrubber shall be equipped with a device for measuring scrubbant flow through the scrubber.

b. The condenser shall be equipped with a device for measuring either outlet temperature of each condenser or for measuring the condenser coolant inlet temperature. Condensers that use a common coolant may have one measuring point. This applies to both condenser that most meet 81% control or to condensers that are product recovery and enable the unit to qualify under Section 218.960(d).

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 chemical process to demonstrate compliance with Conditions 5.5.1 and 7.2.3, pursuant to Section 39.5(7)(b) of the Act:

a. Condenser operating condition for each processing batch. For purposes of this requirement operating condition shall mean that the unit operator will assure “normal operating condition” (See Section

7.2.12(a)) by documenting that the condenser is on and functioning properly and that the coolant temperature is being automatically and continuously controlled to the properly prescribed level as set by individual unit operating procedures. To document compliance with this requirement the unit operator will record:

i. On/off status of the condenser;

ii. The prescribed procedural temperature setting; and

iii. Proper operation of the continuous temperature controller.

b. Scrubber flow rate (gal/min, once each batch);

c. Scrubber fluid pH and glycol content (once/day);

d. Number of batches of each product;

e. For any leak identified per the requirements of Condition 7.2.3(b) which cannot be readily repaired within one hour after detection, the following records shall be kept [35 IAC 218.966(c)(2)].

i. The name and identification of the leaking component;

ii. The date and time the leak is detected;

iii. The action taken to repair the leak; and

iv. The date and time the leak is repaired.

f. For each reactor system that does not employ compliance with the control requirements of 35 IAC 218.966(a) but relies upon the 1.0 ton/yr individual unit and 5.0, ton/year combined units exempt under 35 IAC 218.960(d), the Permittee shall keep records of the VOM emissions from each individual unit and from all such units combined on a calendar year basis;

g. Production in each reactor system (lb/mo);

h. VOM and HAP emissions (lb/mo); and

i. For any material that was collected from a vacuum receiver that followed a condenser claimed as control equipment and the material was not sent to wastewater treatment, records showing that it was disposed of as

a waste product and not reused or sold as a co-product.

7.2.10 Reporting Requirements

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

a. Emissions exceeding the allowable of Condition 7.2.3(a) whether the exceedance is not meeting 81% control or an emission unit exempt from control exceed 1 ton/yr or all emission units not controlled exceed 5.0 ton/yr; and

b. HAP emissions exceeding the level that classifies this source as a non-major source of HAPs.

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 chemical processes 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:

The raw materials may be varied provided compliance with Condition 7.2.3(a) is met and the source does not become major for HAP emissions.

There are no current limits on the number of batches of currently produced materials.

7.2.12 Compliance Procedures

a. Operation of the chemical processes with the scrubber and condensers in normal operating condition assures compliance with the conditions of this section.

b. Emissions shall be based on previous emission testing and material balance information.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after _____**{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms

without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

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

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

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

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

i. Describe the physical or operational change;

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

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

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

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

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions,

methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

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

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

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

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

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

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

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

8.6.3 Test Reports

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

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (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)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

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

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

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

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

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

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

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

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

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

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

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

   i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Allowable Emissions of Particulate Matter

Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in the following equation:

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

Where:

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

For process weight rate up to 450 ton/hour:

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

[35 IAC 212.321(b)]

10.2 Attachment 2 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 Guidance on Revising This Permit

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

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

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

1. Administrative Permit Amendment

- Corrects typographical errors;

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

- Requires more frequent monitoring or reporting by the Permittee;

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

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

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

marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

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

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

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

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

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

3. Significant Permit Modification

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Source Information

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

Owner Information

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

Operator Information (if different from owner)

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

Applicant Information

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

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

Summary Of Application Contents

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

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

Signature Block

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

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

BY:

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

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

10.5 Attachment 5 Guidance on Renewing This Permit

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

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

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

2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.

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

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

5. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

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

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

Notwithstanding the completeness determination, the Illinois EPA

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

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

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

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

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 BASF Corporation is located at 3938 Porett Drive in Gurnee. The source manufactures surface active agents. In addition, the source operates boilers and oil heaters for use in the process manufacturing operations.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit/Group	Description	Date Constructed	Emission Control Equipment
B1 & 2[a]	Eclipse Steam Boiler (21 mmBtu/Hr, Each)	1977/79	None
B3[a]	VA Power Oil Heater (13.3 mmBtu/Hr)	1980	None
B4[a]	Eclipse Thermal Oil Heater (7.0 mmBtu/Hr)	1975	None
B5[a]	CB Steam Boiler (20.9 mmBtu/Hr)	1986	None
B7[a]	Eclipse Steam Boiler (7.5 mmBtu/Hr)	1974	None
B8[a]	VA Power Oil Heater (12.00 mmBtu/Hr)	2001	None
G02	R1-R5, R7 Alkoxylation	Pre-1989	Scrubber (R37)
G02	V-52, 53 EO/PO Vapor Tanks T-101, 103 EO/PO Storage Tanks (30,000 Gal Each)	Pre-1989	Scrubber (R37)
G03	R22, 23, 29 West Esterification Reactors, Recovery Condenser and Flaker	Pre-1989	None
G04	Reactors R8, 9, 15, 17, 19 Finish Tank F1-F5 (Also Called R30 - R34 East Esterification/Finishing/ Special Projects	Pre-1989	Condensers
G05	R16, 20, 26, 28 West Building Multi-Use Reactors Silicone Fluids/Silicone Textile Softeners/Silicone and Organic Defoamers	Pre-1989	None
G06	R18 West Building	Pre-1989	Condenser
G07	R21 West Building	Pre-1989	No Process Vents
G08	R36, T50, T11 and T123 Wastewater Concentrator	1990	Condenser or R36 and T50
EO/PO Storage and Delivery System	Fugitive Emissions	----	LDAR

[a] All boilers/heaters combined are Group 1 (G01)

III. EMISSIONS

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

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	49.3
Sulfur Dioxide (SO_2)	0.3
Particulate Matter (PM)	6.2
Nitrogen Oxides (NO_x)	63.0
HAP, not included in VOM or PM	-----
TOTAL	118.8

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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