

217/782-2113

"REVISED"

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and

PERMITTEE

TITLE I PERMIT¹

ExxonMobil Oil Corporation
Attn: D. O. Moles
3225 Gallows Road
Fairfax, Virginia 22037-0001

Application No.: 95060060 I.D. No.: 031009ACB
Applicant's Designation: Date Received: June 9, 1995
Operation of: Petroleum Bulk Storage and Distribution Terminal
Date Issued: September 15, 1999 Expiration Date: September 15, 2004
Source Location: 2312 Terminal Drive, Arlington Heights, Cook County
Responsible Official: Jeffrey D. Harrington - Terminal Manager

This permit is hereby granted to the above-designated Permittee to operate a petroleum bulk terminal, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: June 26, 2001
Revision Date Issued: December 14, 2001
Purpose of Revision: Administrative Amendment

This Administrative Amendment is being issued due to a name change. Because the changes in the permit were only administrative, no formal public notice was issued.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued September 15, 1999 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

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

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

DES:MED:psj

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated 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

ExxonMobil Oil Corporation
2312 Terminal Drive
Arlington Heights, Illinois 60005
815/423-7732

I.D. No.: 031009ACB
Standard Industrial Classification: 5171, Petroleum Bulk Stations
and Terminals

1.2 Owner/Parent Company

ExxonMobil Oil Corporation
3225 Gallows Road
Fairfax, Virginia 22037-0001

1.3 Operator

ExxonMobil Oil Corporation
2312 Terminal Drive
Arlington Heights, Illinois 60005

Jeffrey D. Harrington - Terminal Manager
815/423-7732

1.4 General Source Description

The ExxonMobil Oil Corporation - Des Plaines Pipeline Station is located at 2312 Terminal Drive, Arlington Heights. The source is a petroleum bulk terminal for various petroleum products. Materials are transferred to the terminal by pipe line and by truck where they may be temporarily stored at the source prior to shipment of the material to petroleum bulk plants or gasoline dispensing operations located within the surrounding community by way of truck. A truck loading/unloading rack is used for this purpose.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
Act	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
ATUs	Allotment Trading Units
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic foot
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kPa	kiloPascals
kW	kilowatts
lb	pound
m	meter
m ³	Cubic meters
mg	Milligram
mm	Millimeter
mmBtu	Million British thermal units
mo	Month
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OM	Organic Material
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psi	Pounds per square inch
psia	Pounds per square inch absolute
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide

T1	Title I - identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
TANKS	USEPA Emission Estimating Program for Storage Tanks
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VCU	Vapor Combustion Unit
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
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:

Additive Tank A-14

Additive Tank A-15

Additive Tank A-16

20,000 Gallon Emergency Spill Tank

Tank 502524

- 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:

Wastewater retention

- 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)].

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

3.2 Addition of Insignificant Activities

- 3.2.1 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).

- 3.2.2 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.
- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Emission Control Equipment
Group 1 Storage Tanks (See Attachment 1 for Details)	Fixed Roof Storage Tanks	Permanent Submerged Fill
Group 2 Storage Tanks (See Attachment 1 for Details)	Existing Internal Floating Roof Storage Tanks	Floating Roof with Primary Seal and Permanent Submerged Fill
Tank Truck Loading/Unloading Rack	Four Bay Petroleum Product Truck Loading and Unloading Rack	Vapor Combustion Unit
Fugitive Emissions	Piping, Valves, and Pumps Used to Transfer Materials Between the Pipe Line Storage Tanks and Loading/Unloading Rack	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
 - c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.
- 5.2.3 Pursuant to 35 IAC 218.585(a), (b), and (c), during the regulatory control periods of May 1 to September 15 of each year, no person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline, that has a Reid vapor pressure in excess of the following:
 - a. Gasoline shall not exceed 9.0 psi (62.07 kPa); and

- b. Ethanol blend gasoline shall not exceed the limitations of (a) above by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline.

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.5 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

This permit is issued based on the source not being subject to 40 CFR 63, Subpart R because the source is not a major source of HAPs. 40 CFR Section 68.115(b)(2)(ii) (See also Condition 5.5.)

5.4 Source-Wide Operational and Production Limits and Work Practices

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

- a. The Permittee shall inspect pumps and compressors for leaks on at least a quarterly basis. If a significant leak is detected by any means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For

this purpose, action shall be considered expeditious if it occurs within 15 days.

- b. During the regulatory control period, May 1 through September 15 of each year, the Permittee shall state that the Reid vapor pressure of all gasoline or ethanol blends leaving the source for use in Illinois complies with the Reid vapor limitations of Condition 5.2.3. Any operation receiving this gasoline shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 218.585(b) and (c) (Condition 5.2.3).

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, 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)	75.10
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	---
Nitrogen Oxides (NO _x)	5.0
HAP, not included in VOM or PM	---
TOTAL	80.10

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data (as described in Section 5.7.3), with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP

emissions and the requirements of 40 CFR 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 General Records for Storage Tanks

- a. The Permittee shall maintain a log identifying which unit-specific condition (Condition 7.1, or 7.2 of this permit) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.
- b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m³ (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.
 - i. The date* on which construction of the tank was commenced, with a copy of supporting documentation;
 - ii. The date(s)* on which modification or reconstruction, as defined in the NSPS, 40 CFR

60.14 and 60.15 respectively, were commenced on the tank, if applicable;

iii. A list of the types of VOL actually stored in the tank and anticipated to be stored in the tank, with date of each change in the list; and

iv. The dimensions of the tank and an analysis of capacity. [35 IAC 218.129(f) and 40 CFR 60.116b(b)]

* If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

5.6.3 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the storage tanks at the source so as to demonstrate compliance with the annual emission limits in Condition 5.5. These records shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

a. The color of each storage tank;

b. The condition of each storage tank; and

c. The type and number of fittings, or a statement that the default settings regarding type and number of fittings in the TANKS program are used for emission estimation.

5.6.4 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to allow verification that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63 Subpart R and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5:

a. The Permittee shall maintain the following general records:

i. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;

- ii. The vapor weight percent of each HAP in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey;
 - iii. A copy of the supporting documentation for HAP vapor weight percent; and
 - iv. A current analysis of the tank or tanks in each group that would have the greatest emissions from storage of various liquids to the extent that the Permittee does not choose to keep throughput records by individual tank, to identify the tank that should be assumed for emission calculations.
- b. The Permittee shall maintain records of the following items on a monthly basis for the previous month:
- i. The throughputs of each organic liquid through each tank or group of tanks if based on 5.6.4(a)(iv);
 - ii. The organic material (OM) emissions attributable to each organic liquid stored at the source, tons/month, with supporting calculations, calculated utilizing an approved USEPA methodology, such as the TANKS program;
 - iii. For each HAP identified as present, the total emissions of the individual HAP for all emission units at the source, tons/month, with supporting calculations; and
 - iv. Total emissions of each individual HAP, and combined HAPs from the source, tons/month, with supporting calculations.

5.6.5 Records for Operating Scenarios

If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F as provided for in Condition 5.8, the Permittee shall maintain a log identifying the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.

5.6.6 Records for Pump and Compressor Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4.

- a. The performance of an inspection or other observation identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;
- b. The condition, i.e., idle or operation, of each pump or compressor inspected;
- c. The presence of a leak, with description and the means of identification;
- d. The date the leak was repaired, or the component taken out of service; and
- e. If a corrective action, as in Condition 5.4, was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

5.6.7 Records for Gasoline Volatility

Pursuant to 35 IAC 218.585(h)(2), the Permittee shall maintain records of the following items for gasoline and ethanol blends leaving the source for use in Illinois:

- a. Reid vapor pressure of each gasoline or ethanol blend shipment;
- b. Quantity of each gasoline or ethanol blend shipment; and
- c. Date of delivery of each shipment.

5.6.8 Retention and Availability of Records

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP

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

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

- a. The Permittee is authorized to store materials with a vapor pressure less than 0.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any storage tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.0 of this permit applicable to such tank based on the storage of VPL shall no longer apply. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of an emission unit, as defined in 35 IAC 201.102.
- b. Upon resuming storage of VPL in such a tank, the applicable unit-specific conditions of Section 7.0 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct applicable inspection of the tank for storage of VPL.

5.9 General Compliance Procedures

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

5.10 Special Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 218.142 as Condition 5.4 establishes appropriate compliance procedures for this rule that do not rely on such measurements.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

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

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

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

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are

not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 187 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 21.2000 tons.

This determination includes an adjustment to the initial baseline determination based upon the addition of contingent allotments from emissions units (i.e., 7.5 tons the loading racks covered under Permit No. 94090001) built prior to January 1, 1998, pursuant to 35 IAC 205.320(f)), as further addressed in Attachment 6 of this permit.

- iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

- b. Contingent Allotments for New or Modified Emission Units

Not Applicable

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

- ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

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

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

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

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

None

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

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Group 1 Storage Tanks
Fixed roof storage tanks

7.1.1 Descriptions

The Permittee operates fixed roof storage tanks to store distillate fuels. Permanent submerged loading is used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
TK-3	Fixed Roof	Permanent Submerged Loading Pipe
TK-4	Fixed Roof	Permanent Submerged Loading Pipe
TK-13	Fixed Roof	Permanent Submerged Loading Pipe

7.1.3 Applicability Provisions

An "affected tank," for the purpose of these unit-specific conditions, is a storage tank that is not subject to the requirements of 35 IAC 218.120, 121, or 122 because it is not used to store organic liquid with a maximum true vapor pressure of 0.5 psia or greater.

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.1.2. The status of all storage tanks at this source, including affected tanks, is summarized in Attachment 1.

7.1.4 Non-Applicable Regulations

- a. The affected tank(s) are not subject to 35 IAC 218.120 pursuant to 35 IAC 218.119(a), because the tanks are used to store a material with a true vapor pressure of less than 0.5 psia.
- b. The affected tank(s) are not subject to the requirements of 40 CFR 60 Subparts K, Ka or Kb, because the tanks were constructed prior to the applicability dates of the NSPS for Storage Vessels for Petroleum Liquids.

7.1.5 Control Requirements

N/A

7.1.6 Emission Limitations

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

7.1.7 Operating Requirements

Pursuant to Section 39.5(7)(a) of the Act and 35 IAC 218.119(a) the Permittee shall not store any organic material with a true vapor pressure of 0.5 psia or greater.

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 each affected tank to demonstrate compliance with Conditions 5.5.1 and 7.1.7 pursuant to Section 39.5(7)(b) of the Act:

The storage of any organic liquid with a true vapor pressure greater than 0.5 psia.

7.1.10 Reporting Requirements

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

Any storage of organic liquid with a true vapor pressure greater than 0.5 psia in an affected tank within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

7.1.11 Operational Flexibility/ Anticipated Operating Scenarios

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

Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.1 of this permit.

7.1.12 Compliance Procedures

- a. For the purpose of estimating VOM emissions from the storage tanks, the current version of the TANKS program is acceptable.
- b. For the purpose of estimating HAP emissions from the tanks, the vapor wt percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product shall be used (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (a) above. Total monthly HAP emissions will be based on the sum of the emissions for each individual HAP.

7.2 Unit Group 2 Storage Tanks
Internal floating roof storage tanks

7.2.1 Description

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

7.2.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
TK-1	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-2	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-5	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-6	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-7	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-8	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-9	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-10	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-11	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
TK-12	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof

7.2.3 Applicability Provisions

An "affected tank," for the purposes of these unit-specific conditions, is a storage tank that is subject to the requirements of 35 IAC 218.121, 218.122(b), and 218.123. Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, storing volatile petroleum liquid (VPL), is subject to the

requirements of 35 IAC 218.123(b) unless it is specifically excluded pursuant to 35 IAC 218.123(a). A tank may be permanently exempt based on applicability of a NSPS. A tank also may be exempt due to the current service, features, or other circumstances associated with the tank. A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3 °K (70 °F).

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.2.2. The status of all storage tanks at this source, including affected tanks is summarized in Attachment 1.

7.2.4 Non-Applicable Regulations

- a. The affected tank(s) are not subject to the requirements of 35 IAC 218.120 pursuant to 35 IAC 218.119(e) because the tanks are used solely for the storage of petroleum liquids.
- b. The affected tank(s) are not subject to the requirements of 40 CFR 60 Subparts K, Ka or Kb, because the tanks were constructed prior to the applicability dates of the NSPS for Storage Vessels for Petroleum Liquids.
- c. The affected storage tank TK-2 is not subject to the requirements of 40 CFR 60 Subparts Kb since installation of the internal floating roof, as referenced in Construction Permit 91040024, is not considered to be a modification because the internal floating roof constitutes greater control for the vessel.

7.2.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. A floating roof which rests on the surface of the VOL that is equipped with a primary seal [35 IAC 218.121(b)(1)];
- b. All openings of the floating roof deck, other than drains, shall be equipped with covers, lids or seals [35 IAC 218.123(b)(3)]; and
- c. A permanent submerged loading pipe. [35 IAC 218.122(b)]

7.2.6 Emission Limitations

- a. The above limitations contain revisions to previously issued Construction Permit 91040024. The source has

requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction 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 construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the previous emissions limitations on Tank No. 2, as established in Construction Permit 91040024, i.e., the limits of 1.21 lb/hour and 5.28 ton/year, have been revised based upon the latest USEPA calculation procedures (TANKS program) and the maximum gasoline throughout indicated in the application. The new limits are as follows: [T1R].

Gas Throughput	5114000	gal/month
	51140000	gal/year
VOM	0.60	ton/month
	6.01	ton/year

- b. There are also source wide limitations in Condition 5.5 that include this unit.

7.2.7 Operating Requirements

- a. Each affected tank shall be operated so that the floating roof including the seal closure devices meet each of the following requirements:
- i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)];
 - ii. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:
 - A. The cover, lid or seal is in the closed position at all times except when

petroleum liquid is transferred to or from the tank [35 IAC 218.123(b)(3)(A)];

- B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 218.123(b)(3)(B)]; and
- C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting [35 IAC 218.123(b)(3)(C)].

- b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 218.121 (b)(1)].

7.2.8 Inspection Requirements

- a. The Permittee shall inspect the floating roof seals of each affected tank semiannually, the first inspection being prior to May 1 of each year, to insure compliance with the applicable control and operating requirements [35 IAC 218.123(b)(4)].
- b. The Permittee shall perform a complete inspection of the cover and seals of each affected tank whenever the tank is emptied for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b)(5)].

7.2.9 Recordkeeping Requirements

- a. The Permittee shall maintain records of the following items for each affected tank, pursuant to 35 IAC 218.123(b)(6):
 - i. A list of the types of volatile petroleum liquid stored on a monthly basis;
 - ii. The maximum true vapor pressure of each type of liquid as stored, psia;
 - iii. The results of any inspections or measurements required by the Condition 7.2.8(a) and/or (b), including:
 - A. Type of inspection;

- B. When the inspection and/or measurement was performed;
 - C. Who performed the inspection and/or measurement;
 - D. The method of inspection and/or measurement;
 - E. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
 - F. An indication of compliance status and a summary of recommended corrective action(s).
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.2.8(b) (Cover and Seal Inspection) [35 IAC 218.123(b)(6)]:

Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

7.2.10 Reporting Requirements

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

- a. Any storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.2.5, e.g., "no permanent submerged loading pipe," within 5 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
- b. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.2.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the

event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

- c. Any exceedance of the specific operational and emissions limitations in Condition 7.2.6(a).

7.2.11 Operational Flexibility/ Anticipated Operating Scenarios

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

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.
- b. Changes accounted for in Condition 5.8.

7.2.12 Compliance Procedures

- a. For the purpose of estimating VOM emissions from the storage tanks, the current version of the TANKS program is acceptable.
- b. For the purpose of estimating HAP emissions from the tanks, the vapor wt percent (based the 1992 USEPA survey or the data required in Section 5.6) of each HAP for each product times the VOM emissions contributed by that product shall be used (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (a) above. Total monthly HAP emissions will be based on the sum of the emissions for each individual HAP.

7.3 Unit: Truck Loading/Unloading Rack
 Control: Vapor Combustion Unit

7.3.1 Description

The truck loading/unloading rack is used to load and unload various petroleum products and additives. The Permittee operates a loading rack that consists of four bays that include a total of four loading points. The VOM emissions from the truck loading/unloading rack occur when material is loaded into delivery vehicles. A vapor combustion unit is used to capture and control the emissions that occur as a result of displacement of vapors in the delivery vehicles. The VOM emissions from unloading material are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions that are attributed to the components, i.e., valves, flanges, etc. associated with the truck loading stations.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date of Construction
Loading/Unloading Rack (LR-1)	Four Bay Loading Rack Used for Loading Various Petroleum Products Into Tank Trucks, and Unloading Additives and Off-Spec Products	Vapor Combustion Unit (VCU-1)	July 1995

7.3.3 Applicability Provisions and Applicable Regulations

An "affected loading rack," for the purpose of these unit-specific conditions, is a loading rack that is subject to the requirements of 40 CFR 60 Subpart XX and 35 IAC 218.582 and relies on a vapor collection/combustion unit for compliance. For purposes of 40 CFR 60 Subpart XX, a "gasoline tank truck" is a delivery tank truck used at bulk gasoline terminals which is loading gasoline or has loaded gasoline on the immediately previous load. Each loading rack used to transfer gasoline into a delivery vessel (gasoline tank truck) from any bulk gasoline terminal is subject to the requirements of 35 IAC 218.582. Loading racks constructed or modified after December 17, 1980 are subject to the requirements of 40 CFR 60 Subpart XX.

7.3.4 Non-Applicability of Regulations of Concern

N/A

7.3.5 Control Requirements and Operational Limitations

- a. Each affected loading rack shall be equipped and operated with a vapor collection system designed to collect the total organic compounds (TOC) vapors displaced from tank trucks during product loading that limits the emissions to the atmosphere to not more than 35 milligrams of TOC per liter of gasoline loaded pursuant to 40 CFR 60.502(a), and (b) and 35 IAC 218.582(a)(2).
- b. The total organic compound emissions from loading rack (LR-1) and associated vapor combustion unit (VCU-1) shall not exceed 7 milligrams per liter of gasoline loaded. This limitation was established in Construction Permit 94090001, pursuant to 35 IAC Part 203. This limit ensures that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [See also Conditions 7.3.5(c) and 7.3.6(a)] [T1]
- c. Loadout of gasoline through loading rack (LR-1) shall not exceed 50,000,000 gal/mo and 380,000,000 gal/yr. These limitations were established in Construction Permit 94090001, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [See also Conditions 7.3.5(b) and 7.3.6(a)] [T1]

7.3.6 Emission Limitations

- a. Volatile organic material emissions from loading rack (LR-1) and associated vapor combustion unit (VCU-1) attributable to the loading of petroleum products shall not exceed 1.5 tons/month and 11.1 tons/year. These limitations were established in Construction Permit 94090001, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [See also Condition 7.3.5(b) and (c)] [T1]
- b. Volatile organic material emissions from loading rack (LR-1) and associated vapor combustion unit (VCU-1) attributable to fugitive emissions (valves, pump seals, etc.) shall not exceed 8.0 tons/year. These

limitations were established in Construction Permit 94090001, pursuant to 35 IAC Part 203. This limit ensures that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. [See also Condition 7.3.5(b) and (c)] [T1]

- c. There are also source wide limitations in Condition 5.5 that include this unit.

7.3.7 Operating Requirements

- a. Vapor collection systems used to control TOC emissions from affected loading racks shall be designed and operated to prevent any TOC vapors collected at one affected loading rack from passing to another affected loading rack. [40 CFR 60.502(d)]
- b. The Permittee shall act to assure that loading of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]
- c. The Permittee shall act to assure that each affected loading rack and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. [40 CFR 60.502(g)]
- d. There shall be no liquid drainage from the loading device of an affected loading rack when it is not in use. [35 IAC 218.582(a)(3)]
- e. An affected loading rack and associated vapor collection system shall be designed and operated to prevent gauge pressure in the gasoline tank truck from exceeding 4,500 pascals (450 mm of water) during product loading. [40 CFR 60.502(h)]
- f. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with an affected loading rack. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection. [35 IAC 218.582(b)(2), 218.582(b)(1)(A) and (C)]

- g. No pressure-vacuum vent in an affected loading rack's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [40 CFR 60.502(i)]
- h. All loading and vapor return lines shall be equipped with fitting which are vapor tight. [35 IAC 218.582(a)(4)]
- i. The temperature controller set point of the vapor collection/combustion system of an affected loading rack shall be maintained at the manufacturer's recommended temperature but not lower than 1400°F.
- j. All loading of liquid product into gasoline tank trucks at an affected loading rack shall be limited to vapor-tight tanks using the following procedures in accordance with 40 CFR 60.502:
 - i. The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck. [40 CFR 60.502(e)(1)]
 - ii. The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded. [40 CFR 60.502(e)(2)]
 - iii. The Permittee shall cross-check each tank identification number obtained above with the file of tank vapor tightness documentation within two weeks after the tank is loaded. [40 CFR 60.502(e)(3)]
 - iv. The Permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the terminal within three weeks after the loading has occurred. [40 CFR 60.502(e)(4)]
 - v. The Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the terminal until vapor tightness documentation for that tank truck is obtained. [40 CFR 60.502(e)(5)]
- k. No person shall cause or allow the transfer of gasoline into a delivery vessel from an affected loading rack unless the delivery vessel displays the appropriate sticker pursuant to 35 IAC 218.584(b) or (d) or the delivery vessel has provided a current certification as required by 35 IAC 218.584(c)(3),

and the delivery vessel meets the following requirements [35 IAC 218.582(a)(5) and 218.584(a)]:

- i. Includes a vapor space connection that is equipped with fitting which is vapor tight;
- ii. Has its hatches closed at all times during loading or unloading operations, unless a top loading vapor recovery system is used;
- iii. Does not internally exceed a gauge pressure of 18 inches of water or a vacuum of 6 inches of water;
- iv. Is designed and maintained to be vapor tight at all times during normal operations;
- v. Is not refilled in Illinois at other than:
 - A. Bulk gasoline terminals that comply with the requirements of 35 IAC 218.582; or
 - B. Bulk gasoline plants that comply with the requirements of 35 IAC 218.581(b).
- vi. Are tested annually in accordance with Method 27, 40 CFR 60, Appendix A. Each vessel must be repaired and retested within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, when it fails to sustain:
 - A. A pressure drop of no more than three inches of water in five minutes; and
 - B. A vacuum drop of no more than three inches of water in five minutes.

7.3.8 Inspection and Monitoring Requirements

- a. Each calendar month, the vapor collection/combustion system and each affected loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. The detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [40 CFR 60.502(j)]
- b. Pilot flames shall be present at all times when loading occurs. The pilot flame shall be monitored using a thermocouple or equivalent device to detect the presence of a flame. An affected loading rack

must be shut down and not allow loading if a pilot flame is not detected in the associated vapor collection/combustion system.

- c. The vapor collection/combustion system of an affected loading rack shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the vapor control combustion collection system temperature.

7.3.9 Recordkeeping Requirements

a. General Recordkeeping

The Permittee shall maintain records of the following for each affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.3.5(c), and 7.3.6(a) and (b):

- i. The identification and properties of each organic liquid distributed through each affected loading rack, as related to emissions, i.e., vapor pressure and molecular weight;
- ii. The amount of each organic liquid distributed through each affected loading rack, gallons per month and gallons per year, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months;
- iii. The number of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service, as applicable
- iv. Emissions of VOM attributable to loading of petroleum products, tons/month and tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology, such as Section 5.2 of the AP-42 and the control efficiency of a VCU as demonstrated in the most recent test, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months;
- v. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.), tons/month and tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology; and
- vi. Emissions of NO_x, tons/month and tons/year, with supporting calculations, calculated

utilizing the compliance procedure specified in Condition 7.3.12(c).

b. Records of Operations

The Permittee shall maintain records of the following for loading rack (LR-1) and associated vapor combustion unit (VCU-1) to demonstrate compliance with Conditions 7.3.5 and 7.3.7:

- i. The use of an affected loading rack for loading of any gasoline tank truck when there was no pilot flame present in the associated VCU or when the VCU was not operating at the appropriate temperature, including:
 - A. The date and time of the loading;
 - B. The specific problem with the VCU or flame monitor;
 - C. Type of material loaded; and
 - D. The reason that loading occurred even though the VCU did not have a pilot flame or was not operating at the appropriate temperature.
- ii. The use of an affected loading rack for the loading of any nonvapor-tight gasoline tank (one not meeting the requirements of Condition 7.3.7(j)) or a delivery vessel that does not display the appropriate sticker or has not provided a current certification (one not meeting the requirements of Condition 7.3.7(k)), including:
 - A. The date and time of the loading;
 - B. The specific reason the vessel did not meet the requirements of Condition 7.3.7(j) or (k);
 - C. Type of material loaded; and
 - D. The reason why loading was allowed.

c. Inspection Requirements

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

A record of each monthly leak inspection required under 40 CFR 60.502(j) (Condition 7.3.8) shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

- i. Date of inspection;
- ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak);
- iii. Leak determination method;
- iv. Corrective action, including the date each leak was repaired and the reasons for any repair interval in excess of 15 days; and
- v. Name and signature of the person that performed the inspection.

d. Gasoline Tank Truck Records

The Permittee shall keep the following records for the gasoline tank trucks loaded at this terminal:

- i. The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) (Condition 7.3.7(j)(i));
- ii. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include as a minimum, the following information:
 - A. Test title: Gasoline Deliver Tank Pressure Test - EPA Reference Method 27;
 - B. Owner name and address;
 - C. Tank identification number;
 - D. Testing location;
 - E. Date of test;
 - F. Tester name and signature;
 - G. Witnessing inspector, if any: name, signature, and affiliation; and

H. Test results: Actual pressure change in 5 minutes, mm of water (average 2 runs).

iii. The Permittee shall keep documentation of all notifications required under 40 CFR 60.502(e)(4) (Condition 7.3.7(j(iv))) on file at the terminal.

7.3.10 Reporting Requirements

a. Annual Report

The Permittee shall provide an annual report, to be submitted with the source's annual emission report, which includes the following:

- i. The monthly and annual throughputs for each affected loading rack for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 7.3.5(a), gallons/month and gallons/year (e.g., for the annual totals, for the month of January, the throughput from February of the preceding year through January, for the month of February, the throughput from March of the preceding calendar year through February, 12 months in all);
- ii. The monthly and annual emissions of VOM attributable to the loading of petroleum products for each affected loading rack for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 7.3.6(a), tons/month and tons/year (e.g., for the annual totals, for the month of January, the emissions from February of the preceding year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all);
- iii. The annual emissions of VOM attributable to fugitive losses (valves, pump seals, etc.) from the loading rack components sufficient to demonstrate compliance with total emissions limitation of Condition 7.3.6(b); and
- iv. Summarization of any use of an affected loading rack to load delivery vessels (gasoline tank trucks) into trucks that did not meet the requirements of Conditions 7.3.7(j) or (k), including:

- A. The date and time of the loading;
- B. The specific reason the vessel did not meet the requirements of Condition 7.3.7(j) or (k);
- C. Type of material loaded; and
- D. The reason why loading was allowed;

b. Semi-Annual Reports

Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit a semi-annual report for any monitoring that is required. These reports shall be submitted by the end of January and July of each year and shall include the following information for the preceding 6 month period:

- i. Summary of any use of an affected loading rack when there was no pilot flame present in the associated VCU, or the VCU was not operating at the appropriate temperature, including:
 - A. Date and time of occurrence;
 - B. Specific problem associated with the VCU or flame monitor;
 - C. Type of material being loaded; and
 - D. Reason why loading continued.
- ii. Summary of all times when the pilot flame was not detected including:
 - A. Date and time of occurrence;
 - B. Specific problem, i.e., the pilot flame was out or a malfunction of the flame monitoring equipment; and
 - C. Supporting data, i.e., strip chart or disk.
- iii. Summary of times when the continuous temperature indicator and/or strip chart recorder or disk storage was not functioning, including:
 - A. Date and time of occurrence; and

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

c. Reporting of Non-compliance

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limits as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Notification within 15 days of operation of loading rack (LR-1) and/or associated vapor combustion unit (VCU-1) in excess of the limitations of Condition 7.3.6(a), (b) or 7.3.5(c).

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

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

None

7.3.12 Compliance Procedures

- a. Compliance with the operational limitations of Condition 7.3.5(c), emission limitations of Condition 7.3.6(a) and (b) and the operating requirements of Condition 7.3.7 shall be demonstrated through the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.3.8, 7.3.9, and 7.3.10 and the compliance procedures in 7.3.12(d) and (e).
- b. Compliance with the control requirements of 7.3.5(a) and (b) shall be demonstrated by the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.3.8, 7.3.9, and 7.3.10 and the fact that compliance of loading rack (LR-1) and associated vapor combustion unit (VCU-1) have previously been demonstrated by fulfillment of the test requirements of 40 CFR 60.8 by measurement of the total organic concentration(s) in the effluent stream of the vapor combustion system pursuant to 40 CFR 60.503.
- c. Compliance with the NO_x emission limitations of Condition 5.5.1 shall be demonstrated by the summation of the monthly NO_x emissions required by

Condition 7.3.9(a)(v). Emissions shall be calculated by use of the following equation:

$$\text{Total NO}_x \text{ Emissions (lb)} = \text{Throughput (gallon)} \\ \times 4 \times 8.345 \times 10^{-6}$$

Where:

Throughput = Loading Rack Throughput as determined by the records required in 7.3.9(a)

4 = VCU manufacturer's guaranteed NO_x emission rate (mg/liter of gasoline loaded); and

8.345 x 10⁻⁶ = Conversion factor lb-liter/gal-mg

- d. Compliance with the VOM emission limitations of Condition 7.3.6(a) shall be demonstrated through the calculation of the following equation:

$$\text{Total VOM Emissions (lb)} = \text{Throughput (gallon)} \\ \times 2.37 \times 8.345 \times 10^{-6}$$

Where:

Throughput = Loading Rack Throughput as determined by the records required in 7.3.9(a)

2.37 = The controlled VCU emission rate as demonstrated through stack testing (mg/liter of gasoline loaded); and

8.345 x 10⁻⁶ = Conversion factor lb-liter/gal-mg

- e. Compliance with the fugitive VOM emission limitations of Condition 7.3.6(b) shall be demonstrated through the calculation of the following equation:

$$\text{Total Fugitive VOM Emissions (lb/yr)} = \sum_{i=1} EF_i \times N_i$$

Where:

EF_i = The specific component's (i.e., valves, pump seals, etc.) emission factor listed below. Emission factors found in "Marketing Terminal Emission Factors" published by USEPA on the Technology Transfer Network bulletin board in February, 1995; and

Component	Light Liquid ^a	Heavy Liquid ^b	Gas ^c
Valves	9.48×10^{-5}	5.10×10^{-5}	2.87×10^{-5}
Pumps	1.17×10^{-3}	4.63×10^{-3}	0.00
Other ^d	2.87×10^{-4}	2.50×10^{-4}	2.65×10^{-4}
Loading Arm Valves	9.48×10^{-5}	5.10×10^{-5}	2.87×10^{-5}
Flanges	1.72×10^{-5}	5.50×10^{-5}	9.04×10^{-5}

^a Light liquid - material in a liquid state in which the with a vapor pressure over 0.3 kilopascals (kPa) at 20 o C is greater than or equal to 20 weight percent;

^b Heavy liquid - not in gas/vapor service or light liquid service.

^c Gas - material in a gaseous state at operating conditions; and

^d Other means any components other than valves, pumps, loading arm valves, and flanges

N_i = Number of specific components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service as recorded in the records required in Condition 7.3.9(a).

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 June 2, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written

notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

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

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;

- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

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

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016
 - iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

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

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if 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)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Storage Tank Features and Groupings

TABLE 1-1

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Group 1							
TK-3	882,168	Fixed Roof	-	-	Distillate Fuels	0.5	1955
TK-4	845,670	Fixed Roof	-	-	Distillate Fuels	0.5	1959
TK-13	2,631,510	Fixed Roof	-	-	Distillate Fuels	0.5	1959
Group 2							
TK-1	2,498,748	Internal Floating Roof	Vapor Mounted	-	Various Petroleum Products	9.8	1959
TK-2	2,396,814	Internal Floating Roof	Vapor Mounted	Wiper	Various Petroleum Products	9.8	1959
TK-5	1,173,438	Internal Floating Roof	Vapor Mounted	Vapor Wiper	Various Petroleum Products	9.8	1959
TK-6	559,776	Internal Floating Roof	Vapor Mounted	-	Various Petroleum Products	9.8	1955
TK-7	814,464	Internal Floating Roof	Vapor Mounted	Vapor Wiper	Various Petroleum Products	9.8	1955

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Group 2 (Continued)							
TK-8	514,836	Internal Floating Roof	Mech. Shoe	Rim- Mounted	Various Petroleum Products	9.8	1955
TK-9	516,306	Internal Floating Roof	Mech. Shoe	Rim- Mounted	Various Petroleum Products	9.8	1955
TK-10	790,818	Internal Floating Roof	Mech. Shoe	Rim- Mounted	Various Petroleum Products	9.8	1955
TK-11	2,401,392	Internal Floating Roof	Vapor Mounted	Vapor Wiper	Various Petroleum Products	9.8	1959
TK-12	2,490,684	Internal Floating Roof	Vapor Mounted	Vapor Wiper	Various Petroleum Products	9.8	1959

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: _____

MED:jar

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? <input type="checkbox"/> Yes <input type="checkbox"/> 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? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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

10.6 Attachment 6 - Baseline Emissions Summary

Seasonal VOM emissions from units subject to further reduction, in TPS:

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>
Loading Rack with VCU ¹	10.3308	7.5000
Additive Tanks	0.0200	Note 2
Wastewater Treatment Tank	0.1400	Note 2
Fugitive Emissions	0.2900	0.2900
Tank A1	1.8300	1.8300
Tank A2	1.6400	1.6400
Tank A3	0.1100	0.1100
Tank A4	0.9000	0.9000
Tank A5	0.9900	0.9900
Tank A6	0.9500	0.9500
Tank A7	0.8100	0.8100
Tank A8	0.2600	0.2600
Tank A9	0.0500	0.0500
Tank A10	0.3200	0.3200
Tank A11	2.2900	2.2900
Tank A12	2.2900	2.2900
Tank A13	<u>0.9700</u>	<u>0.9700</u>
Total:	24.1908	21.2000

- Notes:
1. Limits imposed on VOM emissions from the loading rack (including rack fugitives) require that emissions not exceed 7.5 tons/season based on 5 x 1.5 tons/month (See Condition 4(d)(i)) (Permit No. 94090001)
 2. These units are insignificant activities and emission swill not be subject to reduction.

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATU's equals 1 ton.

The source shall maintain records of actual seasonal VOM emissions for each emission unit subject to further reduction in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit for the period of May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by November 30 of each year, pursuant to 35 IAC 205.300.

TOTAL SOURCE ALLOTMENT = 0.88 x 21.2 = 18.6560 TPS

OR 187 ATU

