217/782-2113

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

PERMITTEE

City of Springfield (CWLP)
Attn: S. David Farris, Environmental Health and Safety Manager
CWLP, Municipal Center Complex
7th and Monroe Streets
Springfield, Illinois 62757

Application No.: 01040083 I.D. No.: 167120AHJ
Applicant's Designation: T1 Date Received: April 19, 2001
Operation of: Reynolds Gas Turbine (Power Generation)
Date Issued: January 10, 2003 Expiration Date[2]: January 10, 2008
Source Location: City Water, Light and Power (CWLP), 10th and Reynolds Streets, Springfield, Sangamon County
Responsible Official: S. David Farris, Environmental Health and Safety Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a peaking power turbine, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

DES:YB:jar

cc: Illinois EPA, FOS, Region 2

[1] While not present at this time, in the future 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. Any such terms and conditions would be 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

City Water, Light and Power, City of Springfield
10th and Reynolds Streets
Springfield, Illinois 62702
217/757-8610

I.D. No.: 167120AHJ
SIC: 4911, Electric Generating Operations

1.2 Owner/Parent Company

City of Springfield
CWLP, Municipal Center Complex
7th and Monroe Streets
Springfield, Illinois 62757

1.3 Operator

City of Springfield
CWLP, Municipal Center Complex
7th and Monroe Streets
Springfield, Illinois 62757

1.4 General Source Description

The City of Springfield, City Water, Light and Power (CWLP) has a combustion turbine at 10th and Reynolds Streets. The turbine operates as a peaking unit, generating electric power when sufficient electric power is not available from other sources, due to planned repair and maintenance, unexpected breakdowns, or high levels of electricity demand. The source is managed by personnel from CWLP’s main plant at 3100 Stevenson Drive.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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, USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
HAP	hazardous air pollutant
Ft^3	cubic feet
gal	gallon
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
lb	pound
mmBtu	million British thermal units
mo	month
MWe	megawatts of electricity
N/A	not applicable
NO_X	nitrogen oxides
NSPS	New Source Performance Standards (40 CFR Part 60)
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
ppmv	parts per million volume
PSD	Prevention of Significant Deterioration (40 CFR 52.21)
RMP	Risk Management Plan
scf	standard cubic feet
SIC	Standard Industrial Code
SO_2	sulfur dioxide
USEPA	United States Environmental Protection Agency
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
VOM	volatile organic material

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 IEPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

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

Natural Gas Regulator and Dryer
Access Road

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:

Oil/Water Separator
Distillate Fuel Oil Storage Tanks
Lube Oil Storage Tanks

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

3.2 Compliance with Applicable Requirements

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

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

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

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

3.3 Addition of Insignificant Activities

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

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

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Group	Description	Unit Designation (Model No.)	Rated Load (MWe)	Date Constructed	Emission Control Equipment
Group 1	Combustion Turbine	Unit #1 (General Electric 7L5A1 PM22-1)	19	1970	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 nitrogen oxides (NO_x) 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 and/or requirements as set forth in Section 7 (Unit-Specific Conditions) of this permit.

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

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

b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent into the atmosphere from any emission unit, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 201.162, 212.123(b) and 212.124.

c. No person shall cause or allow the emissions of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppmv pursuant to 35 IAC 214.301.

5.2.3 Ozone Depleting Substances

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

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

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

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

5.2.4 Future Emission Standards

Should this source become subject to a standard under 40 CFR Part 63, after the date issued of this permit, then the Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8.

5.2.5 Episode Action Plan

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

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

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

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

5.3 Non-Applicable Regulations

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding all emission unit emissions. 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)	0.1
Sulfur Dioxide (SO_2)	14.0
Particulate Matter (PM)	3.05
Nitrogen Oxides (NO_x)	249.0
HAP, Not Included in VOM or Particulate Matter	-----
Total	266.15

5.5.2 Emissions of Hazardous Air Pollutants (HAPs)

The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons/year of a single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by regulation so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, or applicable state rules in Title 35 Subtitle B of the Illinois Administrative Code, or Section 502(b)(10) of the CAA.

5.6 General Recordkeeping Requirements

5.6.1 Fuel Records

a. The Permittee shall maintain records of the amount of distillate fuel oil (in gallons), and sulfur content for each shipment of fuel received.

b. The Permittee shall maintain records of the sulfur content of the fuel oil supply to the turbine, based on one of the following methods:

i. Calculate the weighted average sulfur content of the fuel oil in the storage tank after each delivery of fuel oil or,

ii. Perform actual analysis of fuel oil supply sample for each operating day or,

iii. Sulfur content of the fuel oil supply shall be assumed to be the highest sulfur content in any shipment in the tank for the past two years.

c. The Permittee shall maintain monthly records of the following items so as to demonstrate compliance with the limits in Condition 5.5:

Total usage of fuel oil for the turbine, gallons/month.

5.6.2 Emissions Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5, pursuant to Section 39.5(7)(b) of the Act:

a. Total annual emissions of VOM, SO_2, PM, NO_X, and CO on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit, with supporting calculations.

b. If total annual VOM emissions are 10 tons or greater, records of total annual emissions of HAPs that are sufficient to address compliance with Condition 5.5.2 with supporting documentation and calculations.

5.6.3 General Records for Operating Scenarios

None

5.6.4 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), and shall be kept at a location at the source or other office of the Permittee in Springfield, such as City Water Light and Power’s Environmental Health and Safety Office, that is readily accessible to the Illinois EPA and USEPA, and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request.

b. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond 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 of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year, including information on emissions of hazardous air pollutants as specified by 35 IAC Part 254.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

None

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the Recordkeeping and Compliance Procedures in Section 5 and 7 (Unit Specific Conditions) of this permit.

5.9.2 General Procedures for Fugitive PM Emissions

Compliance procedures are not set in this permit for Condition 5.2.2(a) as compliance is presumed to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Combustion Turbine

7.1.1 Description

The Permittee operates a combustion turbine for electric generation. The turbine was installed in 1970 and is fired with distillate fuel oil.

The turbine is used for peak electric generation or emergency electric generation. The turbine is started with a small diesel engine (less than 1,000 horsepower) connected to the turbine. In addition to actual operation to generate electricity, the turbine and starting engine must be periodically “exercised” to confirm that the turbine will operate when needed to generate electricity.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Turbine No.	Description	Rated Load (MWe)	Emission Control Equipment
Unit #1	Simple Cycle Combustion Turbine	19	None

7.1.3 Applicable Provisions

a. An “affected turbine” for the purpose of these unit-specific conditions is the turbine identified in Condition 7.1.2.

b. Each affected turbine is subject to the emission standards identified in Condition 5.2.2.

c. Startup Provisions

The Permittee is authorized to operate an affected turbine in violation of the applicable limit of condition 5.2.2(b), (i.e. 35 IAC 212.123) during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

i. This authorization only extends for a period of up to 30 minutes following initial firing of fuel during each startup event.

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

A. Implementation of established startup procedures, including preheating of the turbine prior to startup when sufficient time is available; and

B. Operating the turbine as peaking unit.

iii. The Permittee shall fulfill applicable recordkeeping and reporting requirements of Condition 7.1.9(b) and 7.1.10(b).

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected turbine is not being subject to the NSPS for Gas Turbine, 40 CFR 60, Subpart GG, because the affected turbine was constructed prior to the applicability date of these standards.

b. This permit is issued based on the affected turbine not being an affected unit under the federal Acid Rain program because it is a simple cycle combustion turbine that commenced operation before November 15, 1990. [40 CFR 72.6(b)(1)]

c. This permit is issued based on the affected turbine not being subject to, 35 IAC Part 217, Subparts V and W, Electric Power Generation and the NO_x Trading Program, respectively, because the name plate capacity of the generator associated with the turbine is less than 25 MWe.

d. This permit is issued based on affected turbine not being subject to the requirements of 35 IAC 212.321 or 212.322 because of the nature of turbines, a process weight rate cannot be set, therefore such rules cannot reasonably be applied.

e. This permit is issued based on the affected turbine not being a major source of emissions for HAPs (See also Condition 5.5.2). This is inherent in the current role of the turbine, in which it effectively serves as an emergency unit that is normally only used for peaking power if other newer and more efficient peaking units are unavailable or insufficient to meet the demand for electricity.

f. This permit is issued based on the affected turbine not being subject to 40 CFR Part 64, Compliance Assurance Monitoring for Major Stationary Sources, because the affected turbine does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Operational and Production Limits and Work Practices

a. At all times, the Permittee shall maintain and operate the affected turbine in a manner consistent with good air pollution control practice for minimizing emissions.

b. i. If the affected turbine is routinely operated or exercised to confirm that the turbine will operate when needed, the operation and opacity of the turbine shall be observed by operating personnel for the turbine or a member of Permittee's environmental staff on a regular basis to assure that the turbine is operating properly, which observations shall be made on at least a semi-annual basis.

ii. If the affected turbine is not routinely operated or exercised, i.e., the time interval between operation of the affected turbine is greater than six months, the operation and opacity of the affected turbine shall be observed as provided above each time the Permittee carries out a scheduled exercise of the affected turbine.

iii. The Permittee shall also conduct observations of operation and opacity of the affected turbine upon written request by the Illinois EPA (see Condition 7.1.7). With the agreement of the Illinois EPA, the Permittee may schedule these observations to take place during normal operation of the affected turbine.

7.1.6 Emission Limitations

Other than the source wide emission limitations in Condition 5.5, the affected turbine is not subject to any specific emission limitations.

7.1.7 Testing Requirements

a. Upon written request by the Illinois EPA, the Permittee shall have the opacity of an affected turbine determined by a certified observer in accordance with USEPA Test Method 9 during representative operating conditions of the turbine as specified by the Illinois EPA. The Illinois EPA may require such observations if, based on its observations, the turbine opacity does not comply with 35 IAC 212.123 or the affected turbine is poorly maintained or operated so as to make compliance with 35 IAC 212.123 uncertain. Such testing shall be

conducted within 45 calendar days of written request, or on the date the affected turbine next operates, or on the date agreed upon by the Illinois EPA, whichever is later.

b. i. The Permittee shall notify the Illinois EPA at least 15 days in advance of the date and time of observations, in order to allow the Illinois EPA to witness the observations. This notification shall include the name and employer of the certified observer(s) and identify any concerns for successful completion of observations, i.e., lack of a suitable location for proper observation or inability to conduct observations under specified operating conditions;

ii. The Permittee shall promptly notify the Illinois EPA of any changes in the date and time of observation; and

iii. The Permittee shall provide a copy of its observers readings to the Illinois EPA at the time of observations, if Illinois EPA personnel are present at the conclusion of observations.

c. The Permittee shall submit a written report for these observations within 15 days of the date of observation. This report shall include:

i. Date, place, and time of observations;

ii. Name and employer of certified observer;

iii. Copy of current certification;

iv. Description of observation conditions;

v. Description of turbine operating conditions;

vi. Raw data;

vii. Opacity determination; and

viii. Conclusion.

7.1.8 Monitoring Requirements

None

Note: Since monitoring is not required, excess emission monitoring reports need not be submitted pursuant to Condition 8.6.1.

7.1.9 Recordkeeping Requirements

a. In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected turbine to demonstrate compliance with Conditions 5.2.2 and 5.5.1 pursuant to Section 39.5(7)(b) of the Act:

i. The maximum sulfur content of fuel oil that may be burned in the turbine and comply with Condition 5.2.2(c), with supporting calculations;

ii. Operation of the turbine with a fuel oil in excess of this sulfur content (as recorded pursuant to Condition 7.1.9(a)), as determined from the records required by Condition 5.6.1, with date, duration, sulfur content of fuel oil, and explanation; and

iii. Operation of the turbine following the end of startup or two hours of operation, whichever occurs first, with opacity above normal, with explanation, whether opacity may have exceeded the limits of Condition 5.2.2(b), and duration of operation until achievement of normal opacity or shutdown.

b. Records for Startup and Excess Opacity

The Permittee shall maintain the following records, pursuant to Section 39.5(7)(b) of the Act, for the affected turbine:

i. The following information for each startup of the affected turbine:

A. Date, time, and type of startup, i.e. whether startup is “remote” (initiated by off-site personnel using automated procedures);

B. Duration of the startup, i.e., start time and time startup discontinued or normal operation achieved, i.e., stable operation at load;

C. Whether operating personnel for the turbine or any environmental staff are on site during startup, even if startup is remote;

D. Opacity in percentage during the startup and at the conclusion of startup, if a certified observer is on site.

ii. The following information for the affected turbine when above normal opacity has been observed by source personnel as identified in (i)(C) above:

A. Name of observer, position, and reason for being at site;

B. Date and duration of above normal opacity, including start time and time when normal operation was achieved;

C. If normal operation was not achieved within 30 minutes, an explanation why startup could not be achieved in 30 minutes;

D. A detailed description of the startup, including reason for operation and whether preheat or reduced loading was performed;

E. An explanation why established startup procedures could not be performed, if not performed;

F. The nature of opacity following the end of startup until achievement of normal operation or shutdown; and

G. Whether exceedance of Condition 5.2.2 may have occurred during startup, with an explanation, if a qualified observer was on-site.

c. Records of Maintenance Activities

An inspection maintenance and repair log for the affected turbine, listing each activity performed with date, pursuant to Section 39.5(7)(b) of the Act.

7.1.10 Reporting Requirements

a. Reporting for Startups of Turbine

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

i. The total number of startups to generate electricity and the total number of such startups that may have resulted in opacity in excess of Condition 5.2.2(b) (i.e., 35 IAC 212.123); and

ii. The estimated duration of excess opacity during startup, minutes/year.

b. Notifications of Deviations

The Permittee shall promptly notify the Illinois EPA of any deviations of the affected turbine from the requirements in this permit as follows, pursuant to Section 39.5(7)(f)(ii) of the Act:

i. Notification within 60 days of operation that may not have been in compliance with the opacity limitations in Condition 5.2.2(b), other than during startup as addressed by Condition 7.1.3(c), as determined from the records required by Condition 7.1.9(b), with a copy of such record for each incident; and

ii. Notification within 30 days of any operation that is not in compliance with the SO_2 emission limitations in Conditions 5.2.2(c), as determined from the records required by Condition 5.6.1 and 7.1.9(a) and (b), with a copy of such records for each incident.

c. Reporting for Changes Made in Accordance with Operation Flexibility

The Permittee shall notify the Illinois EPA, Compliance Section within 30 days of any change in the type of fuel combusted in the turbine as allowed in accordance with the operational flexibility provisions of Condition 7.1.11.

7.1.11 Operational Flexibility/ Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to affected turbine without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee’s obligation to continue to comply with applicable requirements and 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:

Conversion to gaseous fuel.

7.1.12 Compliance Procedures

a. The work practices, testing and recordkeeping required by Conditions 7.1.5, 7.1.7 and 7.1.9 shall be used to demonstrate compliance with the requirements of Condition 7.1.3.

b. Compliance with the emission limits in Condition 5.5.1 shall be based on fuel consumption, fuel heat and sulfur content and appropriate emission factors. If site-specific emission factors are not developed for the turbine, standard emission factors from USEPA emissions estimating guidance, i.e., AP-42, Table 3.1-1 and 3.1-2a, as follows, shall be used to address normal operation of the affected turbine.

Pollutant	Factor (Lb/mmBtu)
NO_x	0.88
CO	0.0033
SO_2	1.01S*
VOM	0.00041
PM	0.012

* Where S represents the percent sulfur in the fuel oil, i.e., S = 0.05.

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 as of the date the proposed permit for this source was issued. This shield is granted based on the Illinois EPA's review of the permit application for this source and its determination that all applicable requirements are specifically identified in this permit. If the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after October 24, 2002 (the date of issuance of the draft permit) unless the permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

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

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

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

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

i. Describe the physical or operational change;

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

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

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

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

8.5 Testing Procedures

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

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

8.6 Reporting Requirements

8.6.1 Excess Emissions Monitoring Reports

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

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

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

8.6.2 Test Notifications

Unless otherwise specified elsewhere in the permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 30 days prior the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

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

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

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

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

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

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

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

8.6.3 Test Reports

Unless otherwise specified elsewhere in the permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

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

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

c. The date any analyses were performed;

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

e. The test and analytical methodologies used;

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

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

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

8.6.4 Reporting Addresses

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

i. IEPA - Air Compliance Unit

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. IEPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University Avenue
Peoria, Illinois 61614

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air and 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 IEPA - Air Compliance Unit with a copy sent to the IEPA - 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 title I provisions and is included in this permit pursuant to both Section 39.5 of the Act and Title I provisions of the CAA. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

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

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

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

ii. As otherwise authorized by the CAA or 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

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

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

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission

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

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

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

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - 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: _____

YB:jar

10.2 Attachment 2 – Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit,
www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit,
www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form, CAAPP Form-199, which is available at: www.eps.state.il.us/air/caapp/199-caapp.pdf.

YB:jar