

217/782-2113

"RENEWAL"  
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Kraft Foods Global, Inc.  
Attn: Michael Burns  
7300 South Kedzie Avenue  
Chicago, Illinois 60629-3534

I.D. No.: 031600CAO  
Application No.: 96030141

Date Received: August 13, 2004  
Date Issued: December 28, 2010  
Expiration Date<sup>1</sup>: December 28, 2015

Operation of: Bakery  
Source Location: 7300 South Kedzie Avenue, Chicago, Cook County, 60629  
Responsible Official: Steven Kunkle, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a bakery, 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 John Cashman at 217/782-2113.

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

ECB:JRC:psj

cc: IEPA, Permit Section  
IEPA, FOS, Region 1

1 Except as provided in Conditions 1.5 and 8.7 of this permit.

TABLE OF CONTENTS

	<u>Page</u>
<b>1.0 INTRODUCTION</b>	4
1.1 Source Identification	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 Source Description	
1.5 Title I Conditions	
<b>2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED</b>	5
<b>3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES</b>	6
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
<b>4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE</b>	10
<b>5.0 OVERALL SOURCE CONDITIONS</b>	12
5.1 Applicability of Clean Air Act Permit Program (CAAPP)	
5.2 Area Designation	
5.3 Source-Wide Applicable Provisions and Regulations	
5.4 Source-Wide Non-Applicability of Regulations of Concern	
5.5 Source-Wide Control Requirements and Work Practices	
5.6 Source-Wide Production and Emission Limitations	
5.7 Source-Wide Testing Requirements	
5.8 Source-Wide Monitoring Requirements	
5.9 Source-Wide Recordkeeping Requirements	
5.10 Source-Wide Reporting Requirements	
5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios	
5.12 Source-Wide Compliance Procedures	
<b>6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS</b>	19
6.1 Emissions Reduction Market System (ERMS)	
<b>7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS</b>	26
7.1 Boilers	
7.2 Ovens	
7.3 Boiler Subject to 40 CFR 60 Subpart Dc	
7.4 Fugitive VOM Emissions - Fumigation/Fogging Process	

	<u>Page</u>
<b>8.0 GENERAL PERMIT CONDITIONS</b>	43
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	
8.6 Reporting Requirements	
8.7 Title I Conditions	
<b>9.0 STANDARD PERMIT CONDITIONS</b>	48
9.1 Effect of Permit	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirements for Compliance Certification	
9.9 Certification	
9.10 Defense to Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening and Reissuing Permit for Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	
9.15 General Authority for the Terms and Conditions of this Permit	
<b>10.0 ATTACHMENTS</b>	
1 Example Certification by a Responsible Official	1-1
2 Emissions of Particulate Matter from Process Emission Units	2-1
3 Compliance Assurance Monitoring (CAM) Plan	3-1
4 Guidance	4-1

1.0 INTRODUCTION

1.1 Source Identification

Kraft Foods Global, Inc.  
7300 South Kedzie Avenue  
Chicago, Illinois 60629-3534  
773/918-8157

I.D. No.: 031600CAO  
County: Cook  
Standard Industrial Classification: 2052, Bakery, Cookies and Crackers

1.2 Owner/Parent Company

Kraft Foods Global, Inc.  
Three Lakes Drive  
Northfield, Illinois 60093-2753

1.3 Operator

Kraft Foods Global, Inc.  
Three Lakes Drive  
Northfield, Illinois 60093-2753

Michael Burns  
773/918-8157

1.4 Source Description

The Kraft Foods Global, Inc. is located at 7300 South Kedzie Avenue, Chicago. The source is a bakery that produces cookies and crackers.

Note: This narrative description is for informational purposes only and is not enforceable.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1".

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

### 3.0 CONDITIONS FOR 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:

Sugar/flour unloading systems with baghouses. The baghouses used on the sugar/flour unloading systems are considered to be inherent control of the process equipment.

Central bin dust return systems with baghouses. The baghouses used on the central bin dust return systems are considered to be inherent control of the process equipment.

Dough mixers with baghouses. The baghouses used on the dough mixers are considered to be inherent control of the process equipment.

Sugar handling system with filters. The filters used on the sugar handling system are considered to be inherent control of the process equipment.

Pulverized sugar transfer with baghouses and cyclone. The baghouses and cyclone used on the pulverized sugar transfer are considered to be inherent control of the process equipment.

Railcar unloading and transfer system with baghouses. The baghouses used on the railcar unloading and transfer system are considered to be inherent control of the process equipment.

Central bins flour transfer with baghouses. The baghouses used on the central bins flour transfer are considered to be inherent control of the process equipment.

Central bins sugar/flour pneumatic conveying with baghouse. The baghouse used on the central bins sugar/flour pneumatic conveying is considered to be inherent control of the process equipment.

Flour weigh hoppers with baghouses. The baghouses used on the flour weigh hoppers are considered to be inherent control of the process equipment.

Fugitive PM emissions from vehicle traffic on paved roads.

Sugar/backup sugar bin receivers

Powder sugar bins

Graham Sugar Scales and graham flour silo with filters. The filters used on the sugar handling system are considered to be inherent control of the process equipment.

Small dust collectors

- 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:

Sugar/flour transfer systems with baghouses. The baghouses used on the sugar/flour transfer systems are considered to be inherent control of the process equipment.

Flour truck unloading system with baghouse. The baghouse used on the flour truck unloading system is considered to be inherent control of the process equipment.

Sugar pulverizer with baghouse. The baghouse used on the sugar pulverizer is considered to be inherent control of the process equipment.

Sandwich cookie bin with baghouse. The baghouse used on the sandwich cookie bin is considered to be inherent control of the process equipment.

Sugar weigh hoppers with baghouse. The baghouse used on the sugar weigh hoppers is considered to be inherent control of the process equipment.

Flour transfer system with filters. The filters used on the flour transfer system are considered to be inherent control of the process equipment.

Flour scaling system with filters. The filters used on the flour scaling system are considered to be inherent control of the process equipment.

Sugar transfer system with filters. The filters used on the sugar transfer system are considered to be inherent control of the process equipment.

Sugar scaling system with filters. The filters used on the sugar scaling system are considered to be inherent control of the process equipment.

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

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas;

(B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

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

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

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

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

### 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 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. 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.

- 3.2.2 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 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Boiler #5	Natural Gas or Distillate Fuel Oil Fired 63.31 mmBtu/hr Boiler	1974	None
Boiler #1	Natural Gas or Distillate Fuel Oil Fired 59.25 mmBtu/hr Boiler	June 1979	None
Oven #1	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #2	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #3	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #4	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #5	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #6	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #9	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #11	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #12	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #13B	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #14	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #15	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #16	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #17	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #18	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #7	Natural Gas Fired 6.5 mmBtu/hr Oven	1952 (oven); May 2000 (Oxidizer)	Natural Gas Fired Catalytic Oxidizer
Oven #8	Natural Gas Fired 6.5 mmBtu/hr Oven	1952 (oven); May 2000 (Oxidizer)	Natural Gas Fired Catalytic Oxidizer
Oven #13A	Natural Gas Fired 6.5 mmBtu/hr Oven	Dec 1978	None
Oven #10	Natural Gas Fired 12 mmBtu/hr Oven	March 2005	None

Boiler #4	Natural Gas Fired 38.2 mmBtu/hr Boiler	Sep 2001	None
Fugitive VOM Emissions	Fumigation/Fogging Process	-	None

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO<sub>x</sub>, VOM, and SO<sub>2</sub> emissions.

### 5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone and attainment or unclassifiable for all other criteria pollutants (CO, lead, NO<sub>2</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, and SO<sub>2</sub>).

### 5.3 Source-Wide Applicable Provisions and Regulations

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

5.3.2 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.
- b. Pursuant to 35 IAC 212.123(a), 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, except as allowed by 35 IAC 212.123(b) and 212.124.

#### 5.3.3 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Certain activities set forth in 35 IAC Sections 212.304 through 212.308 shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with the fugitive particulate matter operating program, submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph b below.
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current.

Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

#### 5.3.4 Ozone Depleting Substances

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

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

#### 5.3.5 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.6 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the

applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

- b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

#### 5.3.7 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, 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 and is incorporated by reference into this permit.
- b. After receipt of notification from IEPA, the Permittee shall implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.
- d. Any subsequent revisions of the plan shall also be sent to the Chicago Department of Environmental Control.

#### 5.3.8 PM<sub>10</sub> Contingency Measure Plan

Should the actual annual source-wide emissions of PM<sub>10</sub> equal or exceed 15 tons, then the Permittee shall prepare and submit a contingency measure plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented by the

Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U. This permit may also have to be revised or reopened to address this regulation (see Condition 9.12.2).

5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there are terms for unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	389.20
Sulfur Dioxide (SO <sub>2</sub> )	204.10
Particulate Matter (PM)	19.13
Nitrogen Oxides (NO <sub>x</sub> )	180.31
HAP, not included in VOM or PM	----
Total	792.74

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source are less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined as the source is considered a minor source of HAPs.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for

MSSCAM, 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.

#### 5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

#### 5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source.

#### 5.9 Source-Wide Recordkeeping Requirements

##### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

#### 5.9.2 Records for HAP Emissions

The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

#### 5.9.3 Retention and Availability of Records

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

### 5.10 Source-Wide Reporting Requirements

#### 5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

#### 5.10.2 Annual Emissions Report

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

### 5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

### 5.12 Source-Wide Compliance Procedures

#### 5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be

addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

### 6.1 Emissions Reduction Market System (ERMS)

#### 6.1.1 Description of ERMS

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

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

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

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

Note: This narrative description is for informational purposes only.

#### 6.1.2 Applicability

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

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

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.1.8, 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 6.1.5.
  - i. VOM emissions from insignificant emission 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 in Section 7.0 of 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 Condition 6.1.8(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 seasonal 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.

#### 6.1.4 Market Transactions

- 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, in accordance with 35 IAC 205.620, and the transfer must be entered into the Transaction Account database.

#### 6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.1.3, 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 the 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 emissions 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 after 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 acquired from the ACMA.

#### 6.1.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 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 conditions report within two days after the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.1.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions 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 35 IAC 205.337;
  - 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 is 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.

6.1.8 Allotment of ATUs to the Source

- a. i. The allotment of ATUs to this source is 723 ATUs per seasonal allotment period.
- ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 82.0409 tons per season.
  - A. This determination includes the use of 1995 and 1996 as baseline seasons.
- iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.1.10 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 6.1.3(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

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Natural Gas Fired Catalytic Oxidizer	00040070	May 12, 2000
Natural Gas/Distillate Fuel Oil Fired Boiler 4	01080014	October 4, 2001
Natural Gas Oven 10	04080034	November 5, 2004

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

- 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 emissions 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.

#### 6.1.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.1.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

#### 6.1.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [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 its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Natural Gas Fired Boiler #3.

Natural Gas/Distillate Fuel Oil Fired Boiler #4.

Natural Gas/Distillate Fuel Oil Fired Boiler #5.

Natural Gas/Distillate Fuel Oil Fired Boiler #1.

Natural Gas/Distillate Fuel Oil Fired Boiler #4 (Sep '01).

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 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 its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Boilers

7.1.1 Description

The boilers are used for the production of steam for space heating. The boilers do not utilize any emission control equipment. Each boiler burns natural gas as the primary fuel and distillate fuel oil as a backup fuel.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Boiler #5	Natural Gas or Distillate Fuel Oil Fired 63.31 mmBtu/hr Boiler	1974	None
Boiler #1	Natural Gas or Distillate Fuel Oil Fired 59.25 mmBtu/hr Boiler	June 1979	None

7.1.3 Applicable Provisions and Regulations

- a. An "affected boiler" for the purpose of these unit-specific conditions, is a boiler described in Conditions 7.1.1 and 7.1.2.
- b. The affected boilers are subject to the emission limits identified in Condition 5.3.2.
- c. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit (affected boilers #5 and #1) with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- d. No person shall cause or allow the emission of particulate matter (PM) into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit (affected boilers #5 and #1) using liquid fuel exclusively (0.10 lbs/mmBtu) [35 IAC 212.206].
- e. No person shall cause or allow the emission of sulfur dioxide (SO<sub>2</sub>) into the atmosphere in any one hour period from any new fuel combustion emission unit (affected boilers #5 and #1) with actual heat input smaller than, or

equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively, to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu) [35 IAC 214.122(b)(2)].

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected boilers not being subject to 35 IAC 218.301 and 218.302, Use of Organic Material, because the provisions of 35 IAC 218.301 and 218.302 shall not apply to fuel combustion emission units, pursuant to 35 IAC 218.303.
- b. The affected boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Control Requirements and Work Practices

- a. Natural gas or distillate fuel oil shall be the only fuel(s) fired in the affected boilers, pursuant to Section 39.5(7)(a) of the Act.

7.1.6 Production and Emission Limitations

Production and emission limitations are not set for the affected boilers. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.1.7 Testing Requirements

Testing requirements are not set for the affected boilers. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.1.8 Monitoring Requirements

- a. The source shall sample each shipment of distillate fuel oil for sulfur content (wt.%) or have supplier certifications of sulfur content (wt.%) for each shipment of distillate fuel, pursuant to Section 39.5(7)(a) of the Act.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.6.1, 7.1.3, and 7.1.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas consumption for each affected boiler (mscf/month and mscf/year).
- b. Distillate fuel oil consumption for each the affected boilers (gallon/month and gallon/year).
- c. The sulfur content (wt. %) for each shipment of distillate fuel oil used in the affected boilers as monitored in Condition 7.1.8.
- d. Emissions of NO<sub>x</sub>, CO, SO<sub>2</sub>, VOM, and PM from the affected boilers in tons/month and tons/year with supporting calculations.

7.1.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of an affected boiler 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:

- i. Emissions from an affected boiler in excess of the limits specified in Condition 7.1.3 within 30 days of such occurrence.
- ii. Operation of an affected boiler in excess of the limits specified in Condition 7.1.5 within 30 days of such occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boilers.

7.1.12 Compliance Procedures

- a. Compliance with Conditions 7.1.3(b), 7.1.3(c), and 7.1.3(d) are addressed by the records required in Conditions 7.1.9(a) and 7.1.9(b).
- b. Compliance with Condition 7.1.3(e) is addressed by the records and reports required in Conditions 7.1.9(c) and 7.1.10(a).
- c. Compliance with the emission limits in Condition 5.6 is addressed by the records required in Condition 7.1.9(d) and standard emission factors and calculation procedures (for example, AP-42).

7.2 Ovens

7.2.1 Description

The baking ovens are used to produce cookies and crackers. Bakery products that contain yeast as an ingredient generate ethanol, a VOM, which is released during the baking process. In addition, liquid flavorings may contain ethanol, propylene glycol or similar VOM carriers. The VOM emissions from baking ovens #7 and #8 may be controlled by a catalytic oxidizer during the ERMS seasonal allotment period, as needed to meet the ATU allotment. Each baking oven and the catalytic oxidizer burn natural gas as the fuel.

Note: This narrative description is for informational purposes only and is not enforceable.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Oven #1	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #2	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #3	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #4	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #5	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #6	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #9	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #11	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #12	Natural Gas Fired 6.5 mmBtu/hr Oven	1952	None
Oven #13B	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #14	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #15	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #16	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #17	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None
Oven #18	Natural Gas Fired 9.5 mmBtu/hr Oven	1963	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
Oven #7	Natural Gas Fired 6.5 mmBtu/hr Oven	1952 (oven); May 2000 (Oxidizer)	Natural Gas Fired Catalytic Oxidizer
Oven #8	Natural Gas Fired 6.5 mmBtu/hr Oven	1952 (oven); May 2000 (Oxidizer)	Natural Gas Fired Catalytic Oxidizer
Oven #13A	Natural Gas Fired 6.5 mmBtu/hr Oven	Dec 1978	None
Oven #10	Natural Gas Fired 12 mmBtu/hr Oven	March 2005	None

7.2.3 Applicable Provisions and Regulations

- a. An "affected oven" for the purpose of these unit-specific conditions, is each oven described in Conditions 7.2.1 and 7.2.2.
- b. The affected ovens are subject to the emission limits identified in Condition 5.3.2.
- c.
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit (affected ovens #13A and #10), either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c) (see also Attachment 1) [35 IAC 212.321(a)].
  - ii. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit (all affected ovens except ovens #13A and #10) for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c) (see also Attachment 2) [35 IAC 212.322].
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

- e. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC Subpart G shall apply only to photochemically reactive material [35 IAC 218.301].

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart TT, Other Emission Units, because bakeries are exempted from the control requirements in Subpart TT, pursuant to 35 IAC 218.980(f).
- b. The affected ovens are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected ovens do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Control Requirements and Work Practices

- a. Natural gas shall be the only fuel fired in the affected ovens and the catalytic oxidizer, pursuant to Section 39.5(7)(a) of the Act.
- b.
  - i. The Permittee is not required to operate the catalytic oxidizer at any time when the associated ovens are in operation [T1 - 00040070].
  - ii. When the catalytic oxidizer on affected ovens #7 and #8 is operated, the catalytic oxidizer shall be operated so as to reduce uncontrolled VOM emissions by 90% overall as provided by the combination of the capture system (100%) and the destruction across the catalytic oxidizer (90%) [T1 - 00040070].
- c. The Permittee shall follow good operating practices for the catalytic oxidizer, including periodic inspection, routine maintenance, and prompt repair of defects, so as to address compliance with the control requirements in Condition 7.2.5(b)(ii) [T1 - 00040070].
- d. Affected ovens #7 and #8 shall be equipped and operated under negative pressure so that all VOM emissions are captured and discharged through the oven stacks to the catalytic oxidizer, except as provided in Condition 7.2.5(b)(i), so as to address compliance with the control requirements in Condition 7.2.5(b)(ii) [T1 - 00040070].
- e. Affected oven #10 shall not be used for production of yeast leavened dough [T1 - 04080034].

7.2.6 Production and Emission Limitations

- a. i. The processing rate of affected oven #10 shall not exceed 10,000 lb of dough/hour [T1R].
- ii. The above limitations contain revisions to previously issued Permit 04080034. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically MSSCAM and/or PSD. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the processing rate is being revised to accurately show direct correlation to the hourly emission limit in Condition 7.2.6(c)(i) [T1R].
- b. The rated input capacity of affected oven #10 shall not exceed 12 million Btu/hour, total [T1 - 04080034].
- c. i. Emissions from affected oven #10 shall not exceed the following limits [T1 - 04080034]:

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(lbs/hr)</u>	<u>(ton/year)</u>
VOM	0.3	1.3
NO <sub>x</sub>	1.2	5.26

- ii. This permit is issued based on minimal emissions of PM/PM<sub>10</sub> and CO from affected oven #10. For this purpose, PM/PM<sub>10</sub> emissions shall not exceed 0.25 lb/hour and 1.1 tons/year and CO emissions shall not exceed 1.0 lb/hour and 4.4 tons/year [T1 - 04080034].
- iii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1 - 04080034].
- iv. The above limitations were established in Permit 04080034, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not

constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1 - 04080034].

7.2.7 Testing Requirements

Testing requirements are not set for the affected ovens. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.2.8 Monitoring Requirements

- a. The catalytic oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the catalytic oxidizer is in use, except as provided in Condition 7.2.5(b)(i). This device shall monitor the catalytic oxidizer temperature rise across the catalyst bed, so as to address compliance with the control requirements in Condition 7.2.5(b)(ii) [T1 - 00040070].

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected ovens to demonstrate compliance with Conditions 5.6.1, 7.2.3, 7.2.5, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas consumption for each affected oven (mscf/month and mscf/year).
- b. Type and amount of dough throughput for each affected oven (ton/month and ton/year).
- c. A file that contains the rated capacity of the burners on the affected oven #10, million Btu/hour, with supporting documentation.
- d. The Permittee shall collect and record the following information each day when the catalytic oxidizer is operated:
  - i. Catalytic oxidizer pre and post catalyst bed temperature monitoring data (°F).
  - ii. A log of operating time for the capture system, catalytic oxidizer, monitoring device, and the associated affected ovens.
  - iii. A maintenance log for the capture system, catalytic oxidizer, and monitoring device detailing all routine

and non-routine maintenance performed, including dates and duration of any outages.

- e. Records addressing use of good operating practices for the catalytic oxidizer:
  - i. Records for periodic inspection of the catalytic oxidizer with date, individual performing the inspection, nature of inspection, and results of emission testing.
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- f. Emissions of NO<sub>x</sub>, CO, and PM based on the combustion of natural gas in the affected ovens and catalytic oxidizer in tons/month and tons/year with supporting calculations.
- g. Emissions of VOM and HAP emissions based on each type of dough throughput, and if applicable flavoring use, from each affected ovens in tons/month and tons/year with supporting calculations.

#### 7.2.10 Reporting Requirements

- a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of an affected oven 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:

- i. Emissions from an affected oven in excess of the limits specified in Condition 7.2.3 within 30 days of such occurrence.
- ii. Operation of an affected oven or catalytic oxidizer in excess of the limits specified in Condition 7.2.5 and 7.2.6 within 30 days of such occurrence.

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected oven.

#### 7.2.12 Compliance Procedures

- a. Compliance with Conditions 7.2.3(b), 7.2.3(c), and 7.2.3(d) are addressed by the records required in Conditions 7.2.9(a) and 7.2.9(f).

- b. Compliance with Condition 7.2.3(e) is addressed by the records required in Conditions 7.2.9(a) and 7.2.9(g). This limitation does not apply to ethanol because ethanol does not create an odor nuisance and it is not considered as a photochemically reactive material.
- c. Compliance with Condition 7.2.5(a) is addressed by the records and reports required in Conditions 7.2.9(a).
- d. Compliance with Conditions 7.2.5(b), 7.2.5(c), and 7.2.5(d) are addressed by the records and reports required in Conditions 7.2.9(d) and 7.2.9(e).
- e. Compliance with Condition 7.2.5(e) is addressed by the records and reports required in Conditions 7.2.9(b).
- f. Compliance with Conditions 7.2.6(a) and 7.2.6(b) are addressed by the records and reports required in Conditions 7.2.9(a) and 7.2.9(b).
- g. Compliance with Condition 7.2.6(c) is addressed by the records and reports required in Conditions 7.2.9(f) and 7.2.9(g).
- h. Compliance with the emission limits in Condition 5.6 is addressed by the records required in Conditions 7.2.9(f) and 7.2.9(g) and standard emission factors and calculation procedures (for example, AP-42).

7.3 Boiler Subject to 40 CFR 60 Subpart Dc

7.3.1 Description

The boiler is used for the production of steam for space heating. The boiler does not utilize any emission control equipment. The boiler burns natural gas as the primary fuel and burns distillate fuel oil as a backup fuel.

Note: This narrative description is for informational purposes only and is not enforceable.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Boiler #4	Natural Gas Fired 38.2 mmBtu/hr Boiler	Sep 2001	None

7.3.3 Applicable Provisions and Regulations

- a. The "affected boiler" for the purpose of these unit-specific conditions, is the boiler described in Conditions 7.3.1 and 7.3.2.
- b. The affected boiler is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 Subpart Dc because the boiler was constructed after June 9, 1989 and the firing rate of the affected boiler is less than 100 mmBtu/hr and greater than 10 mmBtu/hr.
  - i. A. No owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from the affected boiler any gases that contain SO<sub>2</sub> in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected boiler that contains greater than 0.5 weight percent sulfur [40 CFR 60.42c(d)].
  - B. The SO<sub>2</sub> emission limits and fuel oil sulfur limits in Condition 7.3.3(b)(i)(A) apply at all times, including periods of startup, shutdown, and malfunction [40 CFR 60.42c(i)].
  - ii. No owner or operator of an affected boiler that can combust oil and has a heat input capacity of 30 mmBtu/hr or greater shall cause to be discharged into the atmosphere from that affected facility any gases

that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity [40 CFR 60.43c(c)].

- c. The affected boiler is subject to the emission limits identified in Condition 5.3.2.
- d. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- e. No person shall cause or allow the emission of particulate matter (PM) into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu) [35 IAC 212.206].
- f. No person shall cause or allow the emission of sulfur dioxide (SO<sub>2</sub>) into the atmosphere in any one hour period from any new fuel combustion emission unit with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively, to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu) [35 IAC 214.122(b)(2)].

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

- a. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, do not apply to fuel combustion emission sources [35 IAC 218.303].

#### 7.3.5 Control Requirements and Work Practices

- a. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the affected boiler in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or the USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source [40 CFR 60.11(d)].
- b. Natural gas or distillate (#2) fuel oil shall be the only fuel fired in the affected boiler [T1 - 01080014].
- c. Distillate fuel oil shall not contain greater than 0.3 weight percent sulfur, pursuant to Section 39.5(7)(a) of

the Act. Note, this condition is more stringent than the requirements 40 CFR 60.42c(d) (0.5 weight percent sulfur) because this requirement is needed to demonstrate compliance with Condition 7.3.3(f).

7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected boiler is subject to the following:

- a. Natural gas usage in the affected boiler shall not exceed 21 mmscf/month and 126 mmscf/year [T1 - 01080014].
- b. Distillate fuel oil usage in the affected boiler shall not exceed 6,000 gal/month and 37,000 gal/year [T1 - 01080014].
- c. i. Emissions from the affected boiler shall not exceed the following limits: [T1 - 01080014]

<u>Pollutant</u>	Emissions <u>(Ton/Year)</u>
NO <sub>x</sub>	24.3
CO	6.1
SO <sub>2</sub>	0.7
VOM	0.5
PM	2.5

- ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1 - 01080014].
- iii. The above limitations were established in Permit 01080014, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1 - 01080014].

7.3.7 Testing Requirements

Testing requirements are not set for the affected boiler. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.3.8 Monitoring Requirements

- a. Compliance with the emission limits or fuel oil sulfur limits in Condition 7.3.3(b)(i)(A) may be determined based

on a certification from the fuel supplier [40 CFR 60.42c(h) and (h)(1)].

- b. Owners and operators of an affected boiler that burn only distillate oil that contains no more than 0.5 weight percent sulfur and that do not use a post-combustion technology to reduce SO<sub>2</sub> or PM emissions and that are subject to an opacity standard in 40 CFR 60.43c(c) are not required to operate a COMS if they follow the recordkeeping requirements of Condition 7.3.9(d) [40 CFR 60.47c(c)].

#### 7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boiler to demonstrate compliance with Conditions 5.6.1, 7.3.3, 7.3.5, and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas consumption for the affected boiler (mscf/month and mscf/year) [40 CFR 60.48c(g)(2)].
- b. Distillate fuel oil consumption for the affected boiler (gallon/month and gallon/year) [40 CFR 60.48c(g)(2)].
- c. A certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted [40 CFR 60.48c(e)(11)].
- d. Fuel supplier certification shall include the following information: [40 CFR 60.48c(f)].
  - i. The name of the oil supplier [40 CFR 60.48c(f)(1)(i)].
  - ii. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c [40 CFR 60.48c(f)(1)(ii)].
  - iii. The sulfur content or maximum sulfur content of the oil [40 CFR 60.48c(f)(1)(iii)].
- e. A maintenance log for the affected boiler detailing all routine and non-routine maintenance performed.
- f. Emissions of NO<sub>x</sub>, CO, SO<sub>2</sub>, VOM, and PM from the affected boiler in tons/month and tons/year with supporting calculations.

#### 7.3.10 Reporting Requirements

##### a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected boiler 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:

- i. Emissions from the affected boiler in excess of the limits specified in Conditions 7.3.3 and 7.3.6 within 30 days of such occurrence.
- ii. Operation of the affected boiler in excess of the limits specified in Condition 7.3.5 within 30 days of such occurrence.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boiler.

#### 7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(b)(i) and 7.3.3(f) is addressed by the requirements of Condition 7.3.5(c), the monitoring requirements in Condition 7.3.8(a) and the records required in Conditions 7.3.9(c) and 7.3.9(d).
- b. Compliance with Conditions 7.3.3(b)(ii) and 7.3.3(c) is addressed by the requirements of Condition 7.3.5(a), the monitoring requirements in Condition 7.3.8(b), and the records required in Condition 7.3.9(d).
- c. Compliance with Conditions 7.3.3(c), 7.3.3(d), and 7.3.3(e) is addressed by the normal work practices and maintenance activities required in Condition 7.3.5(a) and the records required in Conditions 7.3.9(e).
- d. Compliance with Conditions 7.3.6(a) and 7.3.6(b) is addressed by the records required in Conditions 7.3.9(a) and 7.3.9(b).
- e. Compliance with emission limitations of Condition 7.3.6(c) is addressed by the records required in Condition 7.3.9(f).
- f. Compliance with the emission limits in Condition 5.6 is addressed by the records required in Condition 7.3.9(f) and standard emission factors and calculation procedures (for example, AP-42).

7.4 Fugitive VOM Emissions - Fumigation/Fogging Process

7.4.1 Description

Fugitive fumigation/fogging of the bakery. The fumigation/fogging process does not utilize any emission control equipment

Note: This narrative description is for informational purposes only and is not enforceable.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Fugitive VOM Emissions	Fumigation/Fogging Process	-	None

7.4.3 Applicable Provisions and Regulations

- a. The "affected fumigation/fogging process" for the purpose of these unit-specific conditions, is the process described in Conditions 7.4.1 and 7.4.2.

7.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected fumigation/fogging process not being subject to 35 IAC 218.301, Use of Organic Material, because the process does not create any odor nuisance and is not considered as a photochemically reactive material.
- b. This permit is issued based on the affected fumigation/fogging process not being subject to 35 IAC Part 218, Subpart TT, Other Emission Units, because bakeries are exempted from the control requirements in Subpart TT, pursuant to 35 IAC 218.980(f).

7.4.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected fumigation/fogging process.

7.4.6 Production and Emission Limitations

Production and emission limitations are not set for the affected fumigation/fogging process.

7.4.7 Testing Requirements

Testing requirements are not set for the affected fumigation/fogging process. However, there are source-wide

testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected fumigation/fogging process.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected fumigation/fogging process to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Fumigation/fogging usage (lb/month and lb/year)
- b. Emissions of VOM and HAP emissions from the affected fumigation/fogging process in tons/month and tons/year with supporting calculations.

7.4.10 Reporting Requirements

a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected fumigation/fogging process 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:

- i. Emissions of VOM or HAP from the affected fumigation/fogging process in excess of the limits specified in Condition 5.6 within 30 days of such occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected fumigation/fogging process.

7.4.12 Compliance Procedures

- a. Compliance with the emission limits in Condition 5.6 is addressed by the records required in Condition 7.4.9 and standard emission factors and calculation procedures (for example, AP-42).

## 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 November 12, 2010 (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

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

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

## 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit.

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 Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [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 determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;
- e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

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

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

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

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 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.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

- 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, pursuant to Section 39.5(7)(j) and (p) of the Act, 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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (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 applicable requirements; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply with Other Requirements

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

#### 9.5 Liability

##### 9.5.1 Title

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

##### 9.5.2 Liability of Permittee

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

##### 9.5.3 Structural Stability

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

##### 9.5.4 Illinois EPA Liability

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

##### 9.5.5 Property Rights

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

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At 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 including any logs, plans, procedures, or instructions required to be kept 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, Air Quality Planning 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 Unit, 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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

- 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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- 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 [Section 39.5(7)(k)(iv) of the Act].

#### 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, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, 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 that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

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

#### 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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and 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

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

**10.0 ATTACHMENTS**

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: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

A. Up to process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
<u>Mg/hr</u>	<u>kg/hr</u>	<u>T/hr</u>	<u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

- i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

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

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 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](http://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](http://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](http://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](http://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 (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)

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