

217/782-2113

CONSTRUCTION PERMIT - NESHAP SOURCE - NSPS SOURCE - PSD APPROVAL

PERMITTEE

ConocoPhillips Company
Attn: Tom Wynn
1000 South Pine, 5540 CB
Ponca City, Oklahoma 74602

Application No.: 06110049

I.D. No.: 119050AAN

Applicant's Designation:

Date Received: November 27, 2006

Subject: Terminal Expansion

Date Issued: TO BE DETERMINED

Location: 2150 South Delmar Avenue, Hartford

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a terminal expansion, that is, modifications to the existing petroleum product terminal to accommodate the neighboring Wood River Refinery's CORE project, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

In conjunction with this permit, approval is given with respect to the federal regulations for Prevention of Significant Deterioration of Air Quality (PSD) for the above referenced project, as described in the application, in that the Illinois Environmental Protection Agency (Illinois EPA) finds that the application fulfills all applicable requirements of 40 CFR 52.21. This approval is issued pursuant to the federal Clean Air Act, as amended, 42 U.S.C. 7401 et. seq., the Federal regulations promulgated thereunder at 40 CFR 52.21 for Prevention of Significant Deterioration of Air Quality (PSD), and a Delegation of Authority agreement between the United States Environmental Protection Agency and the Illinois EPA for the administration of the PSD Program. This approval becomes effective in accordance with the provisions of 40 CFR 124.15 and may be appealed in accordance with the provisions of 40 CFR 124.19. This approval is also based upon and subject to the findings and conditions which follow:

If you have any questions on this permit, please contact Jason Schnepf at 217/782-2113.

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

ECB:JMS:

cc: Region 3
Lotus Notes
CES

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1.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

BACT	Best Available Control Technology
bb1	Barrel
CAAPP	Clean Air Act Permit Program
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CORE	Coker and Refinery Expansion Project
F	Fahrenheit
FCCU	Fluidized Catalytic Cracking Unit
HAP	Hazardous Air Pollutant
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
Kg	Kilogram
LAER	Lowest Achievable Emission Rate
Lb	Pound
Mg	Megagram
MACT	Maximum Achievable Control Technology
Mo	Month
m ³	Cubic meters
mg/L	Milligrams per Liter
mmBtu	Million British Thermal Units
MMGal	Million gallons
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC Part 203), also known as Nonattainment New Source Review (NA NSR)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
PSD	Prevention of Significant Deterioration (40 CFR 52.21)
psia	Pound per square inch absolute
SO ₂	Sulfur Dioxide
USEPA	United States Environmental Protection Agency
VCU	Vapor Combustion Unit
VOC	Volatile Organic Compounds (synonymous with VOM)
VOM	Volatile Organic Material
Yr	Year

2.0 FINDINGS

- 2.1 a. ConocoPhillips has requested a permit for modifications to the existing petroleum product terminal that are required to accommodate the Wood River Refinery's proposed CORE (Coker and Refinery Expansion) project. A separate construction permit application (Application Number 06050052) has been submitted for the changes at the refinery. A further description of the various changes being made is provided in each of the unit-specific conditions of this permit (Section 4.0).
- b. The Illinois EPA is considering ConocoPhillips's CORE project and the changes to the Wood River Products Terminal to comprise a single larger project for the purpose of PSD and NA NSR.
- 2.2 The petroleum product terminal is located in an area designated nonattainment for ozone and PM_{2.5}. For purposes of regulating PM_{2.5}, PM₁₀ will serve as a surrogate pollutant for PM_{2.5}, consistent with current USEPA guidance.
- 2.3 a. This project and the net emissions increase for the project exceeds 40 tons per year of volatile organic material (VOM). The project is therefore subject to 35 IAC 203: Major Stationary Sources Construction and Modification (MSSCAM). (See Attachment 5b.)
- b. This project has potential emissions increases which are more than 100 tons/year of carbon monoxide (CO). The project is therefore subject to PSD review as a major modification for CO emissions. (See Attachment 3.)
- 2.4 a. After reviewing all materials submitted by ConocoPhillips, the Illinois EPA has determined that the project will comply with all applicable Board emissions standards and meet the Lowest Achievable Emission Rate (LAER) as required by MSSCAM and Best Available Control Technology (BACT) as required by the PSD rules.
- b. i. As some units associated with this project which contribute to a significant increase in emissions do not undergo a physical change or change in the method of operation, these units are not subject to BACT or LAER. These units are further identified in Condition 3.3.1 (storage tanks with increase in utilization).
- ii. In addition to the emission units associated with this project not undergoing a physical change or change in the method of operation, there is no relaxation of any existing federally enforceable emission limits as a result of this project for said units.

- 2.5 The Illinois EPA has broadly considered alternatives to this project, as required by 35 IAC 203.306. Alternative sites would not possess the necessary piping infrastructure, and alternative sizes of equipment would not necessarily meet the consumer demands for gasoline supply. Accordingly, the benefits of the proposed project significantly outweigh its environmental and social costs.
- 2.6 Pursuant to 35 IAC 203.305, the Permittee has demonstrated that all major stationary sources which it owns or operates in Illinois are in compliance or on a schedule for compliance with all applicable state and federal air pollution control requirements, as further identified in Condition 3.2.5 of this permit.
- 2.7 A copy of the application and the Illinois EPA's review of the application and a draft of this permit was forwarded to a location in the vicinity of the plant, and the public was given notice and opportunity to examine this material, to submit comments, and to request and participate in a public hearing on this matter.

3.0 OVERALL SOURCE CONDITIONS

3.1 Project Description

The modifications to the existing petroleum product terminal are required to accommodate the Wood River Refinery's proposed CORE (Coker and Refinery Expansion) project. The following are the key elements of the proposed modification:

- One new gasoline tank;
- Two new ethanol tanks;
- Two new distillate tanks;
- Expansion of the existing truck loading rack;

The key elements discussed above and other changes made as part of this project are further addressed in unit-specific conditions (see Section 4.1 through 4.4).

3.2 Source-Wide Applicable Provisions and Regulations

3.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 4 (Unit-Specific Conditions for Specific Emission Units) of this permit.

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

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

3.2.3 Emissions Offsets

- a. The Permittee, either alone or coordinated with ConocoPhillips' Wood River Refinery, shall maintain 440.1 tons of VOM emission offsets generated by other sources in the St. Louis, Missouri/Metro-East, Illinois nonattainment area such that the total is 1.15 times the VOM emissions increase allowed for this project (i.e., 378 tons of offsets for the permitted increase from the refinery, 328.7

tons/year, and 62.1 tons of offsets for the permitted increase from the terminal, 54.0 tons/year).

- b. i. This VOM emission reduction credit is provided by permanent emission reductions that occurred at the following source, as identified below. These emission reductions have been relied upon by the Illinois EPA to issue this permit and cannot be used as emission reduction credits for other purposes. The reductions at the source identified below have been made enforceable by the withdrawal of the air pollution control permits for the units generating the permanent emission reductions.

COMPANY NAME, I.D. No.

Permanent Shutdown of Facility 440.1 tons/year VOM

- ii. If the Permittee proposes to rely upon emission offsets from another source, the Permittee shall apply for and obtain a revision to this permit prior to relying on such emission offsets, which application shall be accompanied by detailed documentation for the nature and amount of those alternative emission offsets.
- c. The acquisition of emission offsets shall be completed either 90 days after issuance of this Construction Permit or prior to commencement of construction of this project, whichever occurs later, unless the Permittee requests an extension and it is approved by the Illinois EPA.

Condition 3.2.3 represents the actions identified in conjunction with this project to ensure that the project is accompanied by emission offsets and does not interfere with reasonable further progress for VOM.

3.2.4 State Rules for Gasoline Distribution

Gasoline loadout operations at this terminal are subject to 35 IAC 219 Subpart Y, which provides that:

- a. No person shall cause or allow the transfer of gasoline into any delivery vessel from any bulk gasoline terminal unless [35 IAC 219.582(a)]:
 - i. The bulk gasoline terminal is equipped with a vapor control system that limits emission of VOM to 80 mg/1 (0.00067 lbs/gal) of gasoline loaded;
 - ii. The vapor control system is operating and all vapors displaced in the loading of gasoline to the delivery vessel are vented only to the vapor control system;

- iii. There is no liquid drainage from the loading device when it is not in use;
 - iv. All loading and vapor return lines are equipped with fittings which are vapor tight; and
 - v. The delivery vessel displays the appropriate sticker pursuant to the requirements of 35 IAC 219.584(b) or (d); or, if the terminal is driver-loaded, the terminal owner or operator shall be deemed to be in compliance with 35 IAC 219.582 when terminal access authorization is limited to those owners and/or operators of delivery vessels who have provided a current certification as required by 35 IAC 219.584(c) (3).
- b. The operator of a bulk gasoline terminal shall [35 IAC 219.582(b)]:
- i. Operate the terminal vapor collection system and gasoline loading equipment in a manner that prevents:
 - A. Gauge pressure from exceeding 18 inches of water and vacuum from exceeding 6 inches of water as measured as close as possible to the vapor hose connection; and
 - B. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B, incorporated by reference in 35 IAC 219.112; and
 - C. Avoidable leaks of liquid during loading or unloading operations.
 - ii. Provide a pressure tap or equivalent on the terminal vapor collection system in order to allow the determination of compliance with 35 IAC 219.582(d) (1) (A); and
 - iii. Within 15 business days after discovery of the leak by the owner, operator, or the Agency repair and retest a vapor collection system which exceeds the limits of 35 IAC 219.582(c) (1) (A) or (B).
- c. The Permittee shall comply with the applicable gasoline delivery vessel requirements and gasoline volatility standards in 35 IAC 219.584 and 219.585, respectively.

3.2.5 Compliance Schedules

All alleged non-compliance (with applicable state and federal air pollution control requirements) posed by the major stationary sources in Illinois that are owned, operated, or under the same common control as the Permittee are addressed in the Consent Decree that was filed on January 27, 2005.

3.3 Source-Wide Non-Applicability of Regulations of Concern

3.3.1 PSD/NAA NSR

- a. The Permittee has addressed the applicability and compliance of 40 CFR 52.21, PSD and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM). The limits established by this permit are intended to ensure that the project addressed in this construction permit does not constitute a major modification of the source pursuant to these rules for NO_x, PM, PM₁₀, PM_{2.5}, and SO₂ emissions (See also Attachments 1 through 8).
 - i. This permit is issued based upon an increase in VOM emissions from storage of additional gasoline and distillate as a consequence of the CORE project of at most 6.7 tons/year (Refer to Condition 4.2.6(a)(ii)).

3.3.2 NESHAP

This permit is issued based on the terminal being operated by the distribution division of ConocoPhillips Corporation, so that it is subject to the NESHAP for Gasoline Distribution Facilities, 40 CFR 63 Subpart R (Refer to Gasoline Distribution Industry (Stage I) - Background Information for Promulgated Standards, USEPA, November 1994, EPA-453/R-94-002b, PB 95-170346, page 3-18).

Note: If the terminal were managed by the same personnel as the refinery, the terminal would be subject to the NESHAP for Refineries, 40 CFR 63 Subpart CC.

3.4 Source-Wide Production and Emission Limitations

None.

3.5 Plant-Wide Recordkeeping Requirements

3.5.1 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.

3.5.2 Records Associated With Non-Attainment Area Pollutants From Existing Units With Increase in Utilization

a. Storage Tanks

For the storage tanks for which the increase in utilization approach for determining the change in emissions is being used:

- i. The increase in throughput at the terminal's maximum capacity from the CORE project (gallons/month).
- ii. Emissions of VOM attributable to the increase in throughput (tons/month and tons/year).

3.6 Plant-Wide Reporting Requirements

3.6.1 Reporting and Notifications Associated with Performance Tests

- a. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.
- b. At least 60 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review. This plan shall describe the specific procedures for testing, including as a minimum:
 - i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. 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 emission unit and any control equipment will be determined.

- iii. The specific determinations of emissions and operation, which are intended to be made, including sampling and monitoring locations.
 - iv. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods.
 - v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
- c. Copies of the Final Reports(s) for these tests shall be submitted to the Illinois EPA within 30 days after the test results are compiled and finalized. The Final Report shall include as a minimum:
- i. A summary of results.
 - ii. General information.
 - iii. Description of test method(s), including description of sample points sampling train, analysis equipment, and test schedule.
 - iv. Detailed description of test conditions, including:
 - A. Process information.
 - B. Control equipment information.
 - v. Data and calculations, including copies of all raw data sheets, opacity observation records and records of laboratory analyses, sample calculations, and data on equipment calibration.

3.7 Authorization to Operate

The new/modified emission units addressed by this construction permit may be operated under this permit until renewal of the CAAPP permit provided the source submits a timely and complete CAAPP renewal application.

4.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

4.1 Loading Rack

4.1.1 Description

The existing loading rack will be physically modified by adding loading bays/arms. The rack will continue to load petroleum products and various gasoline feed stocks into trucks. A new loading rack control device (e.g., vapor combustion unit (VCU)) will be installed to control VOM emissions from the loading rack.

4.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EP-1	Modified Loading Rack	VCU*

* Or a similar control device capable of achieving an equivalent level of control.

4.1.3 Applicable Provisions and Regulations

- a. The "affected unit" for the purpose of these unit-specific conditions, is the loading rack described in Conditions 4.1.1 and 4.1.2.

4.1.3-1 Applicable Federal Standards (40 CFR 63, Subpart R)

The affected unit is subject to 40 CFR 63, Subpart R: National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), which provides that:

- a. Each owner or operator of loading racks at a bulk gasoline terminal subject to the provisions of Subpart R shall comply with the requirements in 40 CFR 60.502 except for 40 CFR 60.500(b), (c), and (j). For purposes of 40 CFR 63.422, the term "affected facility" used in 40 CFR 60.502 means the loading racks that load gasoline cargo tanks at the bulk gasoline terminals subject to the provisions of this subpart [40 CFR 63.422(a)].
- b. Emissions to the atmosphere from the vapor collection and processing systems due to the loading of gasoline cargo tanks shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded [40 CFR 63.422(b)].
- c. Each owner or operator of a bulk gasoline terminal subject to the provisions of this subpart shall comply with 40 CFR 60.502(e) as follows [40 CFR 63.422(c)]:

- i. For the purposes of 40 CFR 60.502, the term "tank truck" as used in 40 CFR 60.502(e) means "cargo tank."
- ii. 40 CFR 60.502(e) (5) is changed to read: The terminal owner or operator shall take steps assuring that the nonvapor-tight gasoline cargo tank will not be reloaded at the facility until vapor tightness documentation for that gasoline cargo tank is obtained which documents that:
 - A. The tank truck or railcar gasoline cargo tank meets the test requirements in 40 CFR 63.425(e), or the railcar gasoline cargo tank meets applicable test requirements in 40 CFR 63.425(i);
 - B. For each gasoline cargo tank failing the test in 40 CFR 63.425(f) or (g) at the facility, the cargo tank either:
 - 1. Before repair work is performed on the cargo tank, meets the test requirements in 40 CFR 63.425(g) or (h), or
 - 2. After repair work is performed on the cargo tank before or during the tests in 40 CFR 63.425(g) or (h), subsequently passes the annual certification test described in 40 CFR 63.425(e).

4.1.3-2 Applicable Federal Standards (40 CFR 60, Subpart XX)

The affected unit is subject to 40 CFR 60, Subpart XX: Standards of Performance for Bulk Gasoline Terminals.

Note: Pursuant to 40 CFR 63.420(g), each owner or operator of a bulk gasoline terminal or pipeline breakout station subject to the provisions of 40 CFR 63, Subpart R that is also subject to applicable provisions of 40 CFR part 60, Subpart XX shall comply only with the provisions in each subpart that contain the most stringent control requirements for that facility.

4.1.3-3 Applicable State Regulations (35 IAC Part 219, Subpart B)

The affected unit is subject to 35 IAC 219.122(a), which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having throughput of greater than 151 cubic meters per day (40,000 gal/day) into any

railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Agency according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 219.108.

4.1.4 Non-Applicability of Regulations of Concern

Non-applicability of regulation of concern are not set for the affected units.

4.1.5 Control Requirements and Work Practices

a. i. BACT Technology

The loading rack control device (e.g., VCU) shall be maintained and operated with good combustion practice to reduce emissions of CO.

ii. BACT Emission Limit

Emissions of CO from the control system for the affected unit shall not exceed 0.0835 lb/1,000 gallons of petroleum product loaded, during loading of material.

b. i. LAER Technology

A. The affected unit shall be controlled by the loading rack control device (e.g., VCU), consistent with the NESHAP (40 CFR 63, Subpart R), which system shall be maintained and operated with good combustion practice to reduce emissions of VOM.

B. The uncaptured emissions from the affected unit shall be minimized by compliance with the requirements of the NESHAP (40 CFR 63, Subpart R) addressing vapor tightness of cargo tanks and operation of vapor collection systems.

ii. LAER Emission Limit

Emissions of VOM from the loading rack control device (e.g., VCU) ,expressed as Total Organic Compounds (TOC) shall not exceed 7.0 mg/L of gasoline loaded.

Condition 4.1.5(a) represents the application of the Best Available Control Technology. Condition 4.1.5(b) represents the application of the Lowest Achievable Emission Rate.

4.1.6 Production and Emission Limitations

- a. Operation of the affected unit shall not exceed the following limits:

Material	Throughput	
	(Gal/Mo)	(Gal/Yr)
Gasoline	51,100,000	306,600,000
Distillate	51,100,000	306,600,000

- b. Emissions from the affected unit attributable to material combusted in the VCU shall not exceed the following limits:

Pollutant	Emission Limit		Increase ¹ (Tons)
	(Tons/Mo)	(Tons/Yr)	
CO	4.3	25.6	23.8
NO _x	1.7	10.2	9.5
VOM (Captured)	---	12.8	12.5
VOM (Fugitive)	---	20.1	19.9

¹ The increase in emissions is based upon a comparison of the actual emissions (average of 2004 and 2005) with the emission limits.

- c. Compliance with the annual limit shall be determined from a running total of 12 months of data.

4.1.7 Testing and Inspection Requirements

- a. The Permittee shall comply with the applicable test methods and procedures in 40 CFR 63.425. In particular, the owner or operator subject to the emission standard in 40 CFR 63.422(b) shall comply with the requirements in 40 CFR 63.425(a) (1) and (2) [40 CFR 63.425(a)].

- i. Conduct a performance test on the vapor processing and collection systems according to either 40 CFR 63.425(a) (1) (i) or (ii).

A. Use the test methods and procedures in 40 CFR 60.503, except a reading of 500 ppm shall be used to determine the level of leaks to be repaired under 40 CFR 60.503(b), or

B. Use alternative test methods and procedures in accordance with the alternative test method requirements in 40 CFR 63.7(f).

- ii. The performance test requirements of 40 CFR 60.503(c) do not apply to flares defined in 40 CFR 63.421 and meeting the flare requirements in 40 CFR 63.11(b). The owner or operator shall demonstrate that the

flare and associated vapor collection system is in compliance with the requirements in 40 CFR 63.11(b) and 40 CFR 60.503(a), (b), and (d), respectively.

4.1.8 Monitoring Requirements

- a. The owner or operator shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) as specified in 40 CFR 63.427(a) (1), (a) (2), (a) (3), or (a) (4), except as allowed in (a) (5) [40 CFR 63.427(a)].
 - i. Where a carbon adsorption system is used, a continuous emission monitoring system (CEMS) capable of measuring organic compound concentration shall be installed in the exhaust air stream [40 CFR 63.427(a) (1)].
 - ii. Where a refrigeration condenser system is used, a continuous parameter monitoring system (CPMS) capable of measuring temperature shall be installed immediately downstream from the outlet to the condenser section. Alternatively, a CEMS capable of measuring organic compound concentration may be installed in the exhaust air stream [40 CFR 63.427(a) (2)].
 - iii. Where a thermal oxidation system other than a flare is used, a CPMS capable of measuring temperature must be installed in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs [40 CFR 63.427(a) (3)].
 - iv. Where a flare meeting the requirements in 40 CFR 63.11(b) is used, a heat-sensing device, such as an ultraviolet beam sensor or a thermocouple, must be installed in proximity to the pilot light to indicate the presence of a flame [40 CFR 63.427(a) (4)].
 - v. Monitoring an alternative operating parameter or a parameter of a vapor processing system other than those listed in 63.427(a) will be allowed upon demonstrating to the USEPA's satisfaction that the alternative parameter demonstrates continuous compliance with the emission standard in 40 CFR 63.422(b) [40 CFR 63.427(a) (5)].

4.1.9 Recordkeeping Requirements

- a. The Permittee shall comply with the applicable recordkeeping requirements of 40 CFR 63.428.

- b. The Permittee shall maintain records of the following items:
 - i. Identification of each type of material loaded.
 - ii. Amount of each material loaded (gallons/month and gallons/year).
 - iii. Emissions from the affected unit (tons/month and tons/year) with supporting calculations and documentation.

4.1.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of deviations of an affected unit with the permit requirements of this section (Section 4.1). Reports shall include information specified in Conditions 4.1.10(a)(i) and (ii).
 - i. Emissions from the affected unit in excess of the limits specified in Condition 4.1.6 within 30 days of such occurrence.
 - ii. Operation of the affected unit in excess of the limit specified in Condition 4.1.6 within 30 days of such occurrence.
- b. The Permittee shall comply with the applicable reporting requirements specified in 40 CFR 63.428.

4.2 Storage Tanks

4.2.1 Description

New tanks will be installed as part of this project as follows:

- Two new ethanol tanks (Tanks 209 and 210). These tanks will have an internal floating roof.
- Two new distillate tanks (Tanks 2001 and 2002). These tanks will be a fixed roof design.
- A new gasoline tank (Tank 2003). This tank will have an internal floating roof.

Several existing tanks will experience an increase in utilization as a result of this project. These emission increases are listed in Section 3.3.1 of this permit.

4.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Tank 209	New ethanol storage tank; 20,000 barrel capacity.	Internal Floating Roof
Tank 210	New ethanol storage tank; 20,000 barrel capacity	Internal Floating Roof
Tank 2001	New distillate storage tank; 200,000 barrel capacity; fixed roof.	None
Tank 2002	New distillate storage tank; 200,000 barrel capacity; fixed roof.	None
Tank 2003	New gasoline storage tank; 200,000 barrel capacity.	Internal Floating Roof

4.2.3 Applicable Provisions and Regulations

- a. An "affected tank" for the purpose of these unit-specific conditions, is a storage tank described in Conditions 4.2.1 and 4.2.2.

4.2.3-1 Applicable Federal Standards (40 CFR 60, Subpart Kb)

The affected ethanol and gasoline tanks are subject to 40 CFR 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, which provides that the affected ethanol and gasoline tanks shall be equipped with a fixed roof in combination with an internal floating roof meeting the following specifications:

- a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible [40 CFR 60.112b(a) (1) (i)].
- b. The internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof:
 - i. A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank [40 CFR 60.112b(a) (1) (ii) (A)].
- c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface [40 CFR 60.112b(a) (1) (iii)].
- d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use [40 CFR 60.112b(a) (1) (iv)].
- e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports [40 CFR 60.112b(a) (1) (v)].
- f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting [40 CFR 60.112b(a) (1) (vi)].
- g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample

well shall have a slit fabric cover that covers at least 90 percent of the opening [40 CFR 60.112b(a)(1)(vii)]

- h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover [40 CFR 60.112b(a)(1)(viii)].
- i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover [40 CFR 60.112b(a)(1)(ix)].

4.2.3-2 Applicable Federal Standards (40 CFR 63, Subpart R)

The affected gasoline tank is subject to 40 CFR 63, Subpart R: National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), which provides that the affected gasoline storage tank shall be installed according to the requirements in 40 CFR 60.112b(a)(1), except for the requirements in 40 CFR 60.112b(a)(1)(iv) through (ix) [40 CFR 63.423(a)].

4.2.3-3 Applicable State Regulations (Storage Containers of VOL)

The affected ethanol tanks are subject to 35 IAC 219.120: Control Requirements for Storage Containers of VOL, which provides that the affected ethanol tanks shall be equipped with an internal floating roof that meets the following specifications:

- a. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- b. Each internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof:
 - i. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

- c. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- h. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

4.2.3-4 Applicable State Regulations (Storage Containers of VPL)

The affected gasoline tank is subject to 35 IAC 219.121: Storage Containers of VPL, which provides that:

- a. The affected gasoline tank shall be designed and equipped with a floating roof which rests on the surface of the VPL and is equipped with a closure seal or seals between the roof edge and the tank wall. Such floating roof shall not be permitted if the VPL has a vapor pressure of 86.19 kPa (12.5 psia) or greater at 294.3 K (70 F). No person shall cause or allow the emission of air contaminants into the atmosphere from any gauging or sampling devices attached to such tanks, except during sampling or maintenance operations [35 IAC 219.121(b)(1)].

4.2.3-5 Applicable State Regulations (Loading Operations)

The affected tanks are subject to 35 IAC 219.122: Loading Operations, which provides that:

- a. The affected tanks shall be equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code 201 [35 IAC 219.122(b)].
- b. Pursuant to 35 IAC 219.122(c), if no odor nuisance exists the limitations of 35 IAC 219.122(b) shall only apply to the loading of volatile organic liquids with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3 K (70 F).

4.2.4 Non-Applicability of Regulations of Concern

- a. The affected distillate tanks are not subject to 40 CFR 60 Subpart Kb, because the affected distillate tanks are storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kPa [40 CFR 60.110b(b)].
- b. This permit is issued based on the affected distillate and gasoline tanks not being subject to 35 IAC 219.120 pursuant to 219.119(e) because the affected tanks are only used to store petroleum liquids.
- c.
 - i. This permit is issued based on the affected distillate tanks not being subject to 35 IAC 219.121: Storage Containers of VPL, because the affected distillate tanks will not store a volatile petroleum liquid, i.e., the vapor pressure will be below 1.5 psia.
 - ii. This permit is issued based on the affected ethanol tanks not being subject to 35 IAC 219.121: Storage Containers of VPL, because the affected ethanol tanks will not store a volatile petroleum liquid as defined in 35 IAC 211.4610.
- d.
 - i. This permit is issued based on the affected distillate tanks not being subject to 35 IAC 219.123: Petroleum Liquid Storage Tanks, because the affected distillate tanks will not store a volatile petroleum liquid, i.e., the vapor pressure will be below 1.5 psia.
 - ii. This permit is issued based on the affected ethanol and gasoline tanks not being subject to 35 IAC 219.123: Petroleum Liquid Storage Tanks, because the affected tanks 209, 210, and 2003 are subject to 40 CFR 60 Subpart Kb [35 IAC 219.123(a)(5)].

4.2.5 Control Requirements and Work Practices

a. LAER Technology

- i. Affected ethanol and gasoline tanks shall be controlled by an internal floating roof with a primary liquid-mounted seal consistent with the control requirements of the 40 CFR 60 Subpart Kb and 40 CFR 63 Subpart R and a secondary rim-mounted seal.
- ii. The true vapor pressure of the material stored in the affected distillate tanks shall not exceed 0.1 psia at the maximum storage temperature.

Condition 4.2.5(a) represents the application of the Lowest Achievable Emission rate.

4.2.6 Production and Emission Limitations

- a. i. Emissions and operation of the affected tanks shall not exceed the following limits:

Tank	Throughput		VOM Emissions (Tons/Yr)
	(MMGal/Mo)	(MMGal/Yr)	
209 & 210	5.2	30.7	0.1

- ii. Breathing loss emissions of the following affected tanks shall not exceed the following limits:

Tank	VOM Emissions (Ton/Yr)
2001 & 2002	1.5
2003	13.1

Note: The working losses from affected tanks 2001, 2002, and 2003 are addressed by Condition 3.3.1, which includes both new and existing gasoline and distillate storage tanks.

- b. Compliance with the annual limits shall be determined from a running total of 12 months of data.

4.2.7 Testing and Inspection Requirements

- a. For the affected gasoline tank, the Permittee shall comply with the applicable test methods and procedures in 40 CFR 63.425.

- b. The Permittee shall fulfill all applicable testing and procedures requirements of 40 CFR 60.113b(a) for the affected ethanol and gasoline tanks [40 CFR 60.113b(a)].
 - i. If the owner or operator determines that it is unsafe to inspect the vessel to determine compliance with 40 CFR 60.113b(a) because the roof appears to be structurally unsound and poses an imminent danger to inspecting personnel, the owner or operator shall comply with the requirements in either 40 CFR 63.120(b)(7)(i) or 40 CFR 63.120(b)(7)(ii) [40 CFR 63.640(n)(8)(ii)].
 - ii. If a failure is detected during the inspections required by 40 CFR 60.113b(a)(2), and the vessel cannot be repaired within 45 days and the vessel cannot be emptied within 45 days, the owner or operator may utilize up to two extensions of up to 30 additional calendar days each. The owner or operator is not required to provide a request for the extension to the Administrator [40 CFR 63.640(n)(8)(iii)].

- b. The Permittee shall fulfill all applicable monitoring of operations requirements of 40 CFR 60.116b for the affected ethanol and gasoline tanks [40 CFR 60.116b].

4.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected tanks.

4.2.9 Recordkeeping Requirements

- a. The Permittee shall maintain records of the following items:
 - i. The type, characteristic and quantity of each material stored in each affected tank, including the maximum true vapor pressure.
 - ii. Throughput (million gallons/month and million gallons/year).
 - iii. VOM emissions from each affected tank (tons/month and tons/year).

- b. The Permittee shall fulfill all applicable recordkeeping requirements of 40 CFR 60.115b for the affected gasoline and ethanol tanks [40 CFR 60.115b].

- c. The Permittee shall fulfill all applicable recordkeeping requirements of 40 CFR 63.428 for the affected gasoline tank, which records shall be kept for at least 5 years.

4.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of deviations of an affected tank with the permit requirements of this section (Section 4.2). Reports shall include information specified in Conditions 4.2.10(a)(i) and (ii).
 - i. Emissions from the affected tanks in excess of the limits specified in Condition 4.2.6 within 30 days of such occurrence.
 - ii. Operation of the affected tanks in excess of the limit specified in Condition 4.2.6 within 30 days of such occurrence.
- b. The Permittee shall fulfill all applicable reporting requirements specified in 40 CFR 60.115b for the affected gasoline and ethanol tanks [40 CFR 60.115b].
- c. The Permittee shall fulfill all applicable reporting requirements of 40 CFR 63.428 for the affected gasoline tank.

4.3 Components

4.3.1 Description

New piping will be required to connect the new storage tanks and modified loading rack. Leaks may occur from components such as valves, connectors, and seals.

4.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Components	Components (Connectors, Valves, Pump Seals)	None

4.3.3 Applicable Provisions and Regulations

- a. An "affected component" for the purpose of these unit-specific conditions, is a new component installed as part of the terminal expansion as described in Conditions 4.3.1 and 4.3.2, and any subsequent replacement of such new component.

4.3.3-1 Applicable Federal Standards (40 CFR 63, Subpart R)

Certain affected components are subject to 40 CFR 63, Subpart R: National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), which provides that:

- a. The Permittee shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Each piece of equipment shall be inspected during the loading of a gasoline cargo tank [40 CFR 63.424(a)].
- b. A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility [40 CFR 63.424(b)].
- c. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in 40 CFR 63.424(d) [40 CFR 63.424(c)].

- d. Delay of repair of leaking equipment will be allowed upon a demonstration to the USEPA that repair within 15 days is not feasible. The owner or operator shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed [40 CFR 63.424(d)].
- e. Initial compliance shall be achieved upon startup [40 CFR 63.424(e)].
- f. As an alternative to compliance with the provisions in 40 CFR 63.424(a) through (d), owners or operators may implement an instrument leak monitoring program that has been demonstrated to the USEPA as at least equivalent [40 CFR 63.424(f)].
- g. Owners and operators shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following [40 CFR 63.424(g)]:
 - i. Minimize gasoline spills;
 - ii. Clean up spills as expeditiously as practicable;
 - iii. Cover all open gasoline containers with a gasketed seal when not in use;
 - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

4.3.3-2 Applicable State Regulations (35 IAC 219, Subpart C)

Pursuant to 35 IAC 219.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of volatile organic liquid with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions.

4.3.4 Non-Applicability of Regulations of Concern

None.

4.3.5 Control Requirements and Work Practices

- a. LAER Technology
 - i. Affected components shall comply with the general standards in 40 CFR 63.162 (40 CFR 63, Subpart H) for

components in gas/vapor service, light liquid service and heavy liquid service, and the following specific standards:

- A. Affected pumps (light liquid service) shall comply with the standards for pumps in light liquid service in 40 CFR 63.163.
 - B. Affected open-ended valves or lines shall comply with the standards for open-ended valves or lines in 40 CFR 63.167.
 - C. Affected valves (gas/vapor service and light liquid service) shall comply with the standards for valves in gas/vapor service and in light liquid service in 40 CFR 63.168.
 - D. Affected pumps, valves, and connectors in heavy liquid service, shall comply with the standards for pumps, valves, and connectors in heavy liquid service in 40 CFR 63.169.
- ii. For affected components, the Permittee shall monitor the component to detect leaks by the method specified in 40 CFR 63.180(b), except that a more stringent definition of a leak shall apply, i.e., an instrument reading of 500 parts per million or greater from valves in gas and light liquid service and an instrument reading of 2,000 ppm or greater from pumps in light liquid service shall be considered a leak.

Condition 4.3.5(a) represents the application of the Lowest Achievable Emission rate.

4.3.6 Production and Emission Limitations

- a. Emissions of VOM from the affected components and existing components at the terminal shall not exceed 2.5 tons per year (combined). This limit represents an increase of 0.2 tons VOM. Compliance with this limit shall be determined using published USEPA methodology for determining VOM emissions from leaking components.

4.3.7 Testing Requirements

- a. The Permittee shall use the Test Methods and Procedures of 40 CFR 60.485.

4.3.8 Monitoring Requirements

None.

4.3.9 Recordkeeping Requirements

- a. The Permittee shall maintain records consistent with the recordkeeping requirements of 40 CFR 60.486.
- b. The Permittee shall maintain records of the following items for affected components:
 - i. Number of components by unit or location and type.
 - ii. Calculated VOM emissions, including supporting calculations, attributable to these components (tons/year).

4.3.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of deviations of an affected component with the permit requirements of this section (Section 4.3). Reports shall describe the probable cause of such deviations, and any corrective actions or preventable measures taken. As the operation of affected components is addressed by reporting requirements under applicable rules, this requirement may be satisfied with the reporting required by such regulations.
- b. The Permittee shall submit reports consistent with the Reporting requirements of 40 CFR 60.487.

4.4 Roadways

4.4.1 Description

The affected units for the purpose of these unit-specific conditions are roadways affected by the CORE project, which may be sources of fugitive particulate matter due to vehicle traffic or wind blown dust. These emissions are controlled by paving and implementation of work practices to prevent the generation and emissions of particulate matter.

4.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Roadways	Paved roads	Pavement of Roadways

4.4.3 Applicable Provisions and Regulations

- a. An "affected unit" for the purpose of these unit-specific conditions, are the units described in Conditions 4.4.1 and 4.4.2.
- b. i. The affected units are subject to 35 IAC 212.301, which provides that 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 toward the zenith at a point beyond the property line of the source.
- ii. Notwithstanding the above, pursuant to 35 IAC 212.314, the above limit shall not apply when the wind speed is greater than 25 mile/hour (40.2 km/hr), as determined in accordance with the provisions of 35 IAC 212.314.

4.4.4 Non-Applicability of Regulations of Concern

Non-applicability of regulations of concern are not set for the affected units.

4.4.5 Control Requirements and Work Practices

- a. Good air pollution control practices shall be implemented to minimize and significantly reduce nuisance dust from affected units associated with the CORE project. After construction of the CORE project is complete, these practices shall provide for pavement on all regularly traveled roads.

4.4.6 Production and Emission Limitations

- a. The emissions of fugitive dust from roadways shall not exceed 10.7 tons/year of PM and 2.1 tons/year of PM₁₀.
- b. 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).

4.4.7 Testing Requirements

a. Silt Loading Measurements

- i. The Permittee shall conduct measurements of the silt loading on various affected roadway segments, as follows:
 - A. Sampling and analysis of the silt loading shall be conducted using the "Procedures for Sampling Surface/Bulk Dust Loading," Appendix C.1 in Compilation of Air Pollutant Emission Factors, USEPA, AP-42. A series of samples shall be taken to determine the average silt loading and address the change in silt loadings as related to the amount and nature of vehicle traffic.
- ii. Measurements shall be performed by the following dates:
 - A. Measurements shall first be completed no later than 30 days after the date that initial startup of the CORE project is completed.
 - B. Measurements shall be repeated within 30 days in the event of changes involving affected units that would act to increase silt loading (so that data that is representative of the current circumstances of the affected units has not been collected), including changes in the amount or type of traffic on affected units, and changes in the standard operating practices for affected units, such as application of salt or traction material during cold weather.
 - C. Upon written request by the Illinois EPA, the Permittee shall conduct measurements, as specified in the request, which shall be completed within 75 days of the Illinois EPA's request.

- iii. The Permittee shall submit test plans, test notifications and test reports for these measurements as specified by Overall Source Condition 3.6.1, provided, however, that once a test plan has been accepted by the Illinois EPA, a new test plan need not be submitted if the accepted plan will be followed or a new test plan is requested by the Illinois EPA.

4.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected units.

4.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected units:

- a. The Permittee shall maintain records for each period of time when it relies upon the exemption provided by 35 IAC 212.314 to not comply with 35 IAC 212.301, with supporting documentation for the determination of wind speed.
- b. The Permittee shall keep records for the silt measurements conducted for affected units pursuant to Condition 4.4.7(a), including records for the sampling and analysis activities and results.
- c. The Permittee shall maintain records for the PM emissions of the affected units to verify compliance with the limits in Condition 4.4.6, based on the above records for the affected units, and appropriate USEPA emission estimation methodology and emission factors, with supporting calculations.
- d. The Permittee shall maintain the following records related to emissions of fugitive particulate matter from affected units. As records of certain information are to be kept in a file, the Permittee shall review and update such information on a periodic basis so that the file contains accurate information addressing the current circumstances of the source.
 - i. A file that contains information on the length and state of road segments at the plant and the characteristics of the various categories of vehicles present at the source as necessary to determine emissions.
 - ii. A file that contains information for the emission factors (lb/vehicle mile traveled), based on

methodology for estimating emissions published by USEPA, with supporting explanation and calculations.

- iii. Records of the estimated vehicle miles traveled on each roadway segment (miles/month, by category of vehicle), with supporting documentation and calculations. These records may be developed from the records for the amount of different materials handled at the source and information in a file that describes how different materials are handled.
- iv. Records for emissions, in ton/month, based on the emission factors and other information contained in other required records, with supporting calculations.

4.4.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA of deviations with permit requirements by affected units as follows. Reports shall describe the probable cause of such deviations, any corrective actions taken, and preventive measures taken and be accompanied by the relevant records for the incident:
 - i. Notification within 30 days for any incident in which 35 IAC 212.301 may have been violated.

5.0 ATTACHMENTS

Attachment 1: Project Emission Summary

Table 1 - Project Emission Summary (Tons/Year)

Operation	NO _x (PSD)	NO _x (NAA NSR)	CO	SO ₂	VOM	PM	PM ₁₀ /PM _{2.5} *
Wood River Products Terminal							
Loading Rack	9.5	9.5	23.8	---	32.4	---	---
Tanks	---	---	---	---	21.4	---	---
Components	---	---	---	---	0.2	---	---
Roadways	---	---	---	---	---	10.0	1.9
SUBTOTAL:	9.5	9.5	23.8	---	54.0	10.0	1.9
Refinery CORE Increases	986.7	948.6	1,039.1	1,548.3	329.0	319.2	224.8
SUBTOTAL:	996.2	958.1	1,062.9	1,548.3	383.0	329.2	226.7
Significance Threshold:	40	40	100	40	40	25	15
Greater Than Significant?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Refinery Core Decreases	1,043.7	1,043.7	15.5	11,131.4	0.3	131.3	131.3
OVERALL PROJECT NET CHANGE:	-47.5	-85.6	1,047.4	-9,583.1	382.7	197.9	95.4

* Emissions of PM_{2.5} in this table are expressed as emissions of PM₁₀, which is being used as a surrogate pollutant (see Condition 2.2).

Attachment 2a

PSD Applicability - NO_x Netting Analysis

Contemporaneous Time Period: July 2002 through October 2009

Table I - Project Emissions Increases and Decreases

Project/Activity	Emission Change (Tons/Year)
CORE Project	-47.5

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Project/Activity	Permit Number	Date	Emissions Increase (Tons/Year)
North Property Flare	06030049	6/2007	1.2
Low Sulfur Gasoline (SZU)	05050062	2/2007	20.6
Ultra Low Sulfur Diesel	04050026	4/2006	128.4
Hartford Integration	03080006	4/2004	524.2
Tier 2	01120044	11/2003	99.2
FCCU 1 Alterations (Boiler 17)	03030069	9/2003	1.8
		Total:	775.4

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Project/Activity	Date	Emissions Decrease (Tons/Year)
North Property Ground Flare Decommissioned	7/2007	1.5
RFP Shutdown	12/2002	2.6
CR-3 2 nd Reheat Heater (fuel switch)	11/2002	86.7
CR-3 1 st Reheat Heater (fuel switch)	11/2002	113.1
CR-3 Charge Heater (fuel switch)	11/2002	115.8
No. 2 Crude Unit, H-25	10/2002	29.7
Isom Unit, H-33 (Hartford Integration)	10/2002	2.5
Isom Unit, H-32 (Hartford Integration)	10/2002	10.8
LSR Hydrotreating, H-31 (Hartford Integration)	10/2002	1.7
Hydrogen Plant, H-30 (Hartford Integration)	10/2002	10.0
Alkylation Heater, H-19 (Hartford Integration)	10/2002	20.8
Reroute/Elimination of Flare Streams at Hartford	10/2002	17.4
FCCU Shutdown at Hartford	10/2002	320.0
	Total:	732.6

Table IV - Net Emissions Change

	(Tons/Year)
Increases and Decreases Associated With Proposed Modification	-47.5
Creditable Contemporaneous Emission Increases	775.4
Creditable Contemporaneous Emission Decreases	732.6
	-4.7

Attachment 2b

Non-attainment NSR Applicability - NO_x Netting Analysis (8-hour Ozone)

Contemporaneous Time Period: May 2001 through October 2009

Table I - Project Emissions Increases and Decreases

Project/Activity	Emission Change (Tons/Year)
CORE Project	-85.6

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Project/Activity	Permit Number	Date	Emissions Increase (Tons/Year)
North Property Flare	06030049	6/2007	1.2
Low Sulfur Gasoline (SZU)	05050062	2/2007	20.6
Ultra Low Sulfur Diesel	04050026	4/2006	224.8
Hartford Integration	03080006	4/2004	524.2
Tier 2	01120044	11/2003	99.2
FCCU 1 Alterations (Boiler 17)	03030069	9/2003	1.8
RAU Steam Reboiler	01060090	10/2001	24.8
		Total:	896.6

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Project/Activity	Date	Emissions Decrease (Tons/Year)
North Property Ground Flare Decommissioned	7/2007	1.5
RFP Shutdown	12/2002	2.6
CR-3 2 nd Reheat Heater (fuel switch)	11/2002	86.7
CR-3 1 st Reheat Heater (fuel switch)	11/2002	113.1
CR-3 Charge Heater (fuel switch)	11/2002	115.8
No. 2 Crude Unit, H-25	10/2002	29.7
Isom Unit, H-33 (Hartford Integration)	10/2002	2.5
Isom Unit, H-32 (Hartford Integration)	10/2002	10.8
LSR Hydrotreating, H-31 (Hartford Integration)	10/2002	1.7
Hydrogen Plant, H-30 (Hartford Integration)	10/2002	10.0
Alkylation Heater, H-19 (Hartford Integration)	10/2002	20.8
Reroute/Elimination of Flare Streams at Hartford	10/2002	17.4
FCCU Shutdown at Hartford	10/2002	320.0
CR-1 2nd Inter-reactor Heater, H-3 (Fuel Switch)	2/2002	32.1
CR-1 1st Inter-reactor Heater, H-2 (Fuel Switch)	2/2002	19.1
CR-1 Feed Preheat, H-1 (Fuel Switch)	2/2002	19.5
RAU Deethanizer Heater Shutdown	10/2001	19.6
	Total:	822.9

Table IV - Net Emissions Change

	(Tons/Year)
Increases and Decreases Associated With Proposed Modification	-85.6
Creditable Contemporaneous Emission Increases	896.6
Creditable Contemporaneous Emission Decreases	822.9
	-11.9

Attachment 3

PSD Applicability - CO Netting Analysis

Contemporaneous Time Period: July 2002 through October 2009

Table I - Project Emissions Increases and Decreases

Project/Activity	Emission Change (Tons/Year)
CORE Project	1,047.4

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Project/Activity	Permit Number	Date	Emissions Increase (Tons/Year)
North Property Flare	06030049	6/2007	6.3
Low Sulfur Gasoline (SZU)	05050062	2/2007	40.6
Ultra Low Sulfur Diesel	04050026	4/2006	52.6
Tier 2	01120044	11/2003	70.7
FCCU 1 Alterations (Boiler 17)	03030069	9/2003	1.1
		Total:	171.3

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Project/Activity	Date	Emissions Decrease (Tons/Year)
HTR-VF1-North	12/2009	14.7
HTR-VF1-South	12/2009	16.5
HTR-BEU-HM1 Shutdown	12/2008	26.7
HTR-BEU-HM2 Shutdown	12/2008	18.8
Boiler 16 Shutdown	12/2008	81.7
North Property Ground Flare Decommissioned	7/2007	7.9
HTR-KHT	4/2006	32.5
RFP Shutdown	12/2002	2.2
No. 2 Crude Unit, H-25	10/2002	7.4
Isom Unit, H-33 (Hartford Integration)	10/2002	0.6
Isom Unit, H-32 (Hartford Integration)	10/2002	2.7
LSR Hydrotreating, H-31 (Hartford Integration)	10/2002	0.4
Hydrogen Plant, H-30 (Hartford Integration)	10/2002	2.5
Alkylation Heater, H-19 (Hartford Integration)	10/2002	5.2
FCCU Shutdown at Hartford	10/2002	68.6
	Total:	288.4

Table IV - Net Emissions Change

	(Tons/Year)
Increases and Decreases Associated With Proposed Modification	1,047.4
Creditable Contemporaneous Emission Increases	171.3
Creditable Contemporaneous Emission Decreases	288.4
	930.3

Attachment 4

PSD Applicability - SO₂ Netting Analysis

Contemporaneous Time Period: July 2002 through October 2009

Table I - Project Emissions Increases and Decreases

Project/Activity	Emission Change (Tons/Year)
CORE Project	-9,583.1

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Project/Activity	Permit Number	Date	Emissions Increase (Tons/Year)
North Property Flare	06030049	6/2007	0.1
Low Sulfur Gasoline (SZU)	05050062	2/2007	32.5
Ultra Low Sulfur Diesel	04050026	4/2006	70.8
Hartford Integration	03080006	4/2004	17.3
Tier 2	01120044	11/2003	28.0
FCCU 1 Alterations (Boiler 17)	03030069	9/2003	0.1
		Total:	148.8

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Project/Activity	Date	Emissions Decrease (Tons/Year)
HTR-VF1-North	12/2009	0.1
HTR-VF1-South	12/2009	0.1
HTR-BEU-HM1 Shutdown	12/2008	1.0
HTR-BEU-HM2 Shutdown	12/2008	0.7
Boiler 16 Shutdown	12/2008	3.0
North Property Ground Flare Decommissioned	7/2007	2.9
HTR-KHT	4/2006	1.2
CR-3 2 nd Reheat Heater (fuel switch)	11/2002	339.0
CR-3 1 st Reheat Heater (fuel switch)	11/2002	646.6
CR-3 Charge Heater (fuel switch)	11/2002	663.0
No. 2 Crude Unit, H-25	10/2002	0.8
Isom Unit, H-33 (Hartford Integration)	10/2002	0.1
Isom Unit, H-32 (Hartford Integration)	10/2002	0.3
Hydrogen Plant, H-30 (Hartford Integration)	10/2002	0.3
Alkylation Heater, H-19 (Hartford Integration)	10/2002	0.6
FCCU Shutdown at Hartford	10/2002	73.9
	Total:	1,733.6

Table IV - Net Emissions Change

	(Tons/Year)
Increases and Decreases Associated With Proposed Modification	-9,583.1
Creditable Contemporaneous Emission Increases	148.8
Creditable Contemporaneous Emission Decreases	1,733.6
	-11,167.9

Attachment 5

Non-attainment NSR Applicability - VOM Netting Analysis (8-hour Ozone)

Contemporaneous Time Period: May 2001 through October 2009

Table I - Project Emissions Increases and Decreases

Project/Activity	Emission Change (Tons/Year)
CORE Project	382.7

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Project/Activity	Permit Number	Date	Emissions Increase (Tons/Year)
Tank A-39-1	06100062	7/2007	2.4
Tank A-49-1	06100062	7/2008	2.4
Tank CH-243	06100051	6/2007	0.2
North Property Flare	06030049	6/2007	2.4
Low Sulfur Gasoline (SZU)	05050062	3/2007	32.4
Ultra Low Sulfur Diesel	04050026	4/2006	27.9
Tanks 32-1 and 33-1	05090047	3/2006	2.6
Tank 403 (Terminal)	05050044	9/2005	9.8
Tank A-19-1	03020012	5/2005	2.8
Hartford Integration	03080006	4/2004	7.4
Tank A-157	03020012	1/2004	8.4
Tank D-9-1	02060051	1/2004	0.4
Tier 2	01120044	11/2003	37.6
FCCU 1 Alterations (Boiler 17)	03030069	9/2003	0.1
Sludge Processing Unit	01120042	3/2002	3.1
RAU Steam Reboiler	01060090	10/2001	0.9
		Total:	140.8

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Project/Activity	Date	Emissions Decrease (Tons/Year)
Tank D-50 Demo	2006-09	2.5
Tank F-12 Demo	2006-09	14.6
Tank F-35 Demo	2006-09	0.3
VF-1 Fugitives	12/2009	0.3
HTR-VF1-North	12/2009	1.0
HTR-VF1-South	12/2009	1.1
HTR-BEU-HM1 Shutdown	12/2008	1.7
HTR-BEU-HM2 Shutdown	12/2008	1.2
Boiler 16 Shutdown	12/2008	5.3
Tank A-49	9/2008	0.5
Tank A-39	9/2007	0.3
North Property Ground Flare Decommissioned	7/2007	1.4
HTR-KHT	4/2006	2.1
Gasoline Tank Replacement	3/2006	0.1
Tank A-4 Demo	1/2006	0.2
Tank F-10 Demo	1/2006	0.5
Tank A-19 Demo	5/2005	4.7
Tank A-9 Demo	1/2004	0.4
Tank A-72 Firewater	12/2003	3.2
RFP Shutdown	12/2002	0.1
Tank 10-21	10/2002	1.9
Gasoline Storage Tanks (35-1, 35-2)	10/2002	6.3
No. 2 Crude Unit, H-25	10/2002	0.6
Isom Unit, H-32 (Hartford Integration)	10/2002	0.2
Hydrogen Plant, H-30 (Hartford Integration)	10/2002	0.2
Alkylation Heater, H-19 (Hartford Integration)	10/2002	0.4
Reroute/Elimination of Flare Streams at Hartford	10/2002	16.1
FCCU Shutdown at Hartford	10/2002	48.4
RAU Deethanizer Heater Shutdown	10/2001	0.9
	Total:	116.5

Table IV - Net Emissions Change

	(Tons/Year)
Increases and Decreases Associated With Proposed Modification	382.7
Creditable Contemporaneous Emission Increases	140.8
Creditable Contemporaneous Emission Decreases	116.5
	407.0

Attachment 6

PSD Applicability - PM Netting Analysis

Contemporaneous Time Period: July 2002 through October 2009

Table I - Project Emissions Increases and Decreases

Project/Activity	Emission Change (Tons/Year)
CORE Project	197.9

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Project/Activity	Permit Number	Date	Emissions Increase (Tons/Year)
Low Sulfur Gasoline (SZU)	05050062	2/2007	10.9
Ultra Low Sulfur Diesel	04050026	4/2006	37.3
Tier 2	01120044	11/2003	5.4
FCCU 1 Alterations (Boiler 17)	03030069	9/2003	0.1
		Total:	53.7

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Project/Activity	Date	Emissions Decrease (Tons/Year)
HTR-VF1-North	12/2009	1.3
HTR-VF1-South	12/2009	1.5
HTR-BEU-HM1 Shutdown	12/2008	2.4
HTR-BEU-HM2 Shutdown	12/2008	1.7
Boiler 16 Shutdown	12/2008	7.4
HTR-KHT	4/2006	2.9
RFP Shutdown	12/2002	0.2
CR-3 2 nd Reheat Heater (fuel switch)	11/2002	11.1
CR-3 1 st Reheat Heater (fuel switch)	11/2002	21.1
CR-3 Charge Heater (fuel switch)	11/2002	21.6
No. 2 Crude Unit, H-25	10/2002	0.6
Isom Unit, H-33 (Hartford Integration)	10/2002	0.1
Isom Unit, H-32 (Hartford Integration)	10/2002	0.2
LSR Hydrotreating, H-31 (Hartford Integration)	10/2002	---
Hydrogen Plant, H-30 (Hartford Integration)	10/2002	0.2
Alkylation Heater, H-19 (Hartford Integration)	10/2002	0.4
FCCU Shutdown at Hartford	10/2002	323.3
	Total:	396.0

Table IV - Net Emissions Change

	(Tons/Year)
Increases and Decreases Associated With Proposed Modification	197.9
Creditable Contemporaneous Emission Increases	53.7
Creditable Contemporaneous Emission Decreases	396.0
	-144.4

Attachment 7

PSD Applicability - PM₁₀ Netting Analysis

Contemporaneous Time Period: July 2002 through October 2009

Table I - Project Emissions Increases and Decreases

Project/Activity	Emission Change (Tons/Year)
CORE Project	95.4

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Project/Activity	Permit Number	Date	Emissions Increase (Tons/Year)
Low Sulfur Gasoline (SZU)	05050062	2/2007	10.9
Ultra Low Sulfur Diesel	04050026	4/2006	37.3
Tier 2	01120044	11/2003	5.4
FCCU 1 Alterations (Boiler 17)	03030069	9/2003	0.1
		Total:	53.7

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Project/Activity	Date	Emissions Decrease (Tons/Year)
HTR-VF1-North	12/2009	1.3
HTR-VF1-South	12/2009	1.5
HTR-BEU-HM1 Shutdown	12/2008	2.4
HTR-BEU-HM2 Shutdown	12/2008	1.7
Boiler 16 Shutdown	12/2008	7.4
HTR-KHT	4/2006	2.9
RFP Shutdown	12/2002	0.2
CR-3 2 nd Reheat Heater (fuel switch)	11/2002	8.0
CR-3 1 st Reheat Heater (fuel switch)	11/2002	15.4
CR-3 Charge Heater (fuel switch)	11/2002	15.6
No. 2 Crude Unit, H-25	10/2002	0.6
Isom Unit, H-33 (Hartford Integration)	10/2002	0.1
Isom Unit, H-32 (Hartford Integration)	10/2002	0.2
Hydrogen Plant, H-30 (Hartford Integration)	10/2002	0.2
Alkylation Heater, H-19 (Hartford Integration)	10/2002	0.4
FCCU Shutdown at Hartford	10/2002	323.3
	Total:	381.2

Table IV - Net Emissions Change

	(Tons/Year)
Increases and Decreases Associated With Proposed Modification	95.4
Creditable Contemporaneous Emission Increases	53.7
Creditable Contemporaneous Emission Decreases	381.2
	-232.1

Attachment 8

Non-Attainment Area NSR Applicability - PM_{2.5}* Netting Analysis

Contemporaneous Time Period: May 2001 through October 2009

Table I - Project Emissions Increases and Decreases

Project/Activity	Emission Change (Tons/Year)
CORE Project	95.4

Table II - Source-Wide Creditable Contemporaneous Emission Increases

Project/Activity	Permit Number	Date	Emissions Increase (Tons/Year)
Low Sulfur Gasoline (SZU)	05050062	3/2007	10.9
Ultra Low Sulfur Diesel	04050026	4/2006	37.3
Tier 2	01120044	11/2003	5.4
FCCU 1 Alterations (Boiler 17)	03030069	9/2003	0.1
		Total:	53.7

Table III - Source-Wide Creditable Contemporaneous Emission Decreases

Project/Activity	Date	Emissions Decrease (Tons/Year)
HTR-VF1-North	12/2009	1.3
HTR-VF1-South	12/2009	1.5
HTR-BEU-HM1 Shutdown	12/2008	2.4
HTR-BEU-HM2 Shutdown	12/2008	1.7
Boiler 16 Shutdown	12/2008	7.4
HTR-KHT	4/2006	2.9
RFP Shutdown	12/2002	0.2
CR-3 2 nd Reheat Heater (fuel switch)	11/2002	8.0
CR-3 1 st Reheat Heater (fuel switch)	11/2002	15.4
CR-3 Charge Heater (fuel switch)	11/2002	15.6
No. 2 Crude Unit, H-25	10/2002	0.6
Isom Unit, H-33 (Hartford Integration)	10/2002	0.1
Isom Unit, H-32 (Hartford Integration)	10/2002	0.2
Hydrogen Plant, H-30 (Hartford Integration)	10/2002	0.2
Alkylation Heater, H-19 (Hartford Integration)	10/2002	0.4
FCCU Shutdown at Hartford	10/2002	323.3
CR-1 2nd Inter-reactor Heater, H-3 (Fuel Switch)	2/2002	3.0
CR-1 1st Inter-reactor Heater, H-2 (Fuel Switch)	2/2002	6.4
CR-1 Feed Preheat, H-1 (Fuel Switch)	2/2002	6.5
RAU Deethanizer Heater Shutdown	10/2001	1.5
	Total:	398.6

Table IV - Net Emissions Change

	(Tons/Year)
Increases and Decreases Associated With Proposed Modification	95.4
Creditable Contemporaneous Emission Increases	53.7
Creditable Contemporaneous Emission Decreases	398.6
	-249.5

* Emissions of PM_{2.5} in this table are expressed as emissions of PM₁₀, which is being used as a surrogate pollutant (see Condition 2.2).

Attachment 9 - Summary of BACT/LAER Determinations

Operation	Permit Section	BACT Determination for CO Control Technology/Emission Limit	LAER Determination for VOM Control Technology/Emission Limit
Loading Rack	4.1	Good combustion practices/0.0835 lb/1000 gallons petroleum product loaded.	Good combustion practices; vapor tightness/7 mg/L of gasoline loaded.
New Storage Tanks	4.2	N/a.	Internal Floating Roof with primary and secondary seals for the new gasoline and ethanol tanks; true vapor pressure of material stored limited to 0.1 psia for the new distillate tanks.
Components	4.3	N/a.	LDAR program equivalent to 40 CFR 63 Subpart H with a leak definition of 500 ppm for valves in gas and light liquid service and 2000 ppm for pumps in light liquid service.

ATTACHMENT 10: STANDARD PERMIT CONDITIONS

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits, which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Illinois EPA and a supplemental written permit issued.
4. The Permittee shall allow any duly authorized agent of the Illinois EPA upon the presentation of credentials, at reasonable times:
 - a. To enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. To have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. To inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. To obtain and remove samples of any discharge or emissions of pollutants, and
 - e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. 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 proposed facilities.

- c. Does not release the Permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations.
 - d. Does not take into consideration or attest to the structural stability of any units or parts of the project, and
 - e. 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 proposed equipment or facility.
- 6a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Illinois EPA before the equipment covered by this permit is placed into operation.
- b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Illinois EPA may file a complaint with the Board for modification, suspension or revocation of a permit.
- a. Upon discovery that the permit application contained misrepresentations, misinformation or false statement or that all relevant facts were not disclosed, or
 - b. Upon finding that any standard or special conditions have been violated, or
 - c. Upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.