



TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	10
5.0 OVERALL SOURCE CONDITIONS	11
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NOT APPLICABLE TO THIS PERMIT	16
7.0 UNIT SPECIFIC CONDITIONS	17
7.1 Main Boiler (EP-1) Control None	
8.0 GENERAL PERMIT CONDITIONS	22
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	

PAGE

8.4	Operational Flexibility/Anticipated Operating Scenarios	
8.5	Testing Procedures	
8.6	Reporting Requirements	
8.7	Obligation to Comply with Title I Requirements	
9.0	STANDARD PERMIT CONDITIONS	27
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	
10.0	ATTACHMENTS	
10.1	Attachment 1 - Summary of Significant Emission Units	1-1
10.2	Attachment 2 - Example Certification by a Responsible Official	2-1

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

1.0 SOURCE IDENTIFICATION

1.1 Source

Conoco Inc., Hartford Lubricants Complex  
2300 South Delmar Avenue  
Hartford, Illinois 62048  
(618) 251-2802

I.D. No.: 119050AAK  
Standard Industrial Classification: 2992, Petroleum Refining and  
Related Industries

1.2 Owner/Parent Company

Conoco Inc.  
North Dairy Ashford  
Houston, Texas 77252-2197

1.3 Operator

Conoco Inc., Hartford Lubricants Complex  
South Delmar Avenue  
Hartford, Illinois 62048

Contact: Safety Health and Environmental Resource Department  
(618) 251-2802

1.4 General Source Description

The Hartford Lubricants Complex is located at South Delmar Avenue in Hartford, Illinois. The source consists of various storage tanks, blend tanks, two boilers, and a packaging plant. The primary function of the source is to receive various base oils and additives and blend them to produce motor oils, gear oils, industrial oils, and fire resistant oils that are then disbursed in bulk through loading racks or packaged in drums, pails, jugs, or quart containers. In addition, a secondary function at the source is to manufacture the plastic quart containers by blending and molding raw materials into the final product and apply labels.

PROPOSED CAAPP PERMIT  
 Conoco Inc., Hartford Lubricants Complex  
 I.D. No.: 119050AAK  
 Permit Number: 95060007  
 October 28, 1999

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	actual cubic feet per minute
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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	carbon monoxide
°F	degrees Fahrenheit
ft <sup>3</sup>	cubic feet
gal	gallon(s)
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kg	kilogram(s)
kPa	kilopascal(s)
kW	kilowatts
lb	pound
m	meter(s)
mmBtu	Million British thermal units
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
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been

PROPOSED CAAPP PERMIT  
 Conoco Inc., Hartford Lubricants Complex  
 I.D. No.: 119050AAK  
 Permit Number: 95060007  
 October 28, 1999

	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
Wt	weight
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Small propane-fired units used to cause labels to adhere to plastic containers

- 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:

Tanks with capacity of 10,000 gal or less that store lubricating oil that contain 1.23%, by weight, of ethylene glycol.

Tanks with capacity of 10,000 gal or less that blend lubricating oil with (1.23% by weight) of ethylene glycol.

Grinder and storage cyclones that separate waste plastic to be recycled.

3.348 mmBtu/hr secondary boiler that is fired on propane/butane transmix with distillate fuel oil back-up.

- 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:

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

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)].

Die casting machines where a metal or plastic is formed under pressure in a die [35 IAC 201.210(a)(12)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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

3.2 Addition of Insignificant Activities

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

3.2.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

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

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Main Boiler EP-1	12.55 mmBtu/hr Cleaver-Brooks boiler with Propane/Butane Transmix as the primary fuel and distillate fuel oil as secondary fuel	November 1981	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued at the request of Conoco Inc, to demonstrate a separation of the Hartford Lubricants Complex from a bulk petroleum terminal located on adjacent property and of the same owner. The determination for separate sources is based on the two sources having different SIC codes and are operated independently of each other, i.e., no exchange of product, raw materials, services, or employees.

5.1.2 This permit is issued based on this source not being a major source of NO<sub>x</sub>, CO, PM<sub>10</sub>, SO<sub>2</sub>, VOM, or HAPs, however this permit is being issued at the request of the source.

5.2 Applicable Regulations

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

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

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

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

- b.
  - i. 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. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

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

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

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

5.2.4 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in Part 68, then the owner or operator shall submit a Risk Management Plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.2.5 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	22.14
Sulfur Dioxide (SO <sub>2</sub> )	5.70
Particulate Matter (PM)	2.81
Nitrogen Oxides (NO <sub>x</sub> )	5.10
HAP, not included in VOM or PM	--
TOTAL	35.75

5.5.2 Emissions of Hazardous Air Pollutants

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 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

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

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

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Main Boiler, EP-1  
 Control None

7.1.1 Description

A 12.55 mmBtu/hr boiler that is fired on the primary fuel of a propane/butane transmix and the secondary fuel of distillate fuel oil as back-up, that is used to generate steam for heat and plant operations.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
EP-1 Main Boiler Mode 0001 Primary Fuel	12.55 mmBtu/hr Cleaver-Brooks CB100-300-15 #D.P. SN: L-71651	None
EP-1 Main Boiler Mode 0002 Secondary Fuel	12.55 mmBtu/hr Cleaver-Brooks CB100-300-15 #D.P. SN: L-71651	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An affected boiler for the purpose of these unit specific conditions is a steam generating unit that is fired with a transmix of propane/butane or distillate fuel oil, with a heat input capacity less than 100 mmBtu/hr but greater than 10 mmBtu/hr.
- b. i. The emissions of particulate matter (PM) into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion emission unit using liquid fuel exclusively. [35 IAC 212.206]
- ii. The emission of sulfur dioxide (SO<sub>2</sub>) into the atmosphere in any one hour period from any new fuel combustion emission unit, burning liquid fuel exclusively shall not exceed 0.46 kg of sulfur dioxide per MW-hr (0.3 lb/mmBtu) of

actual heat input when distillate fuel oil is burned. [35 IAC 214.122(b)(2)]

- iii. No person shall cause or allow the emission of CO into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
- c. The affected boiler is subject to the opacity limits as identified in Section 5.2.2(c).

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected boiler not being subject to the NSPS, 40 CFR 60, Subpart Dc, Standards of Performance for Small-Industrial-Commercial-Institutional Steam Generating Units, because the affected boiler was constructed, modified, or reconstructed prior to June 9, 1989 which is the applicability date.
- b. This permit is issued based on the affected boiler not being subject to 35 IAC 217.121, emissions of NO<sub>x</sub> from new fuel combustion emission units in major metropolitan areas, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).
- c. This permit is issued based on the affected boiler not being subject to 35 IAC Part 219, Subpart K because fuel combustion emission units are exempt from this regulation pursuant to 35 IAC 219.303.

#### 7.1.5 Operational Limits

None

#### 7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boiler is subject to the following:

None

7.1.7 Operating Requirements

- a. The affected boiler shall only be operated with a transmix of propane/butane or distillate fuel oil.
- b. The Permittee shall not use distillate fuel oil (Grades No. 1 and 2 fuels) in the affected boiler with a sulfur content greater than the following:
  - i. 0.28 weight percent

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

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

- a. Total propane/butane transmix usage for the affected boiler (gallons/year);
- b. Total distillate fuel oil usage for the affected boiler (gallons/year);
- c. The maximum sulfur content (in wt. %) of the distillate fuel oil used in the affected boiler.

7.1.10 Reporting Requirements

In addition to the reporting requirements of Condition 5.7, the Permittee shall provide the following reports:

None

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.1.3(b)(i) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in the operation of the affected boiler.
- b. Compliance with Condition 7.1.3(b)(ii) is demonstrated by the affected boiler fired with distillate oil that has a sulfur content meeting the specification of Condition 7.1.7(b).
- c. Compliance provisions addressing Condition 7.1.3(b)(iii) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in the operation of the affected boiler.
- d. Compliance with the emission limits in Condition 5.5.1 shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:
  - i. Emissions from the affected boiler combusting LPG shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/10<sup>3</sup> gal)</u>
PM	0.6
NO <sub>x</sub>	21
SO <sub>2</sub>	0.1
VOM	0.4

These are the emission factors for LPG gas combustion in industrial boilers (10 - <100 mmBtu/hr), Tables 1.5-1, AP-42, 5<sup>th</sup> ed., Volume I, October, 1996 and using the factor for either butane or propane that results in the greater emission. VOM emission factor based on subtracting the methane emission factor from the Total Organic Compounds (TOC) factor.

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

Boiler Emissions (lb) = LPG consumed  
multiplied by the appropriate emission factor.

- ii. Emissions from the affected boiler combusting distillate fuel oil shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10<sup>3</sup> gal)</u>
PM	2
NO <sub>x</sub>	20
SO <sub>2</sub>	39.8
VOM	0.2

These are the emission factors for uncontrolled distillate fuel oil combustion in industrial boilers, Tables 1.3-1 and 1.3-2, AP-42, 5<sup>th</sup> ed., Volume I, October, 1996. "S" indicates that the weight % of sulfur in the distillate fuel oil should be multiplied by the value given.

Boiler Emissions (lb) = distillate fuel oil consumed (10<sup>3</sup> gallons) multiplied by the appropriate emission factor.

- iii. Total emissions for each pollutant are to be determined by combining the results of Conditions 7.1.12 (i) and (ii) for each operating mode of the affected boiler.

## 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 September 18, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

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

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

### 8.3 Emissions Trading Programs

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

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as

not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

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

#### 8.5 Testing Procedures

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

of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

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

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

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

### 8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

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

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

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

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section (MC 11)

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

iv. USEPA Region 5 - Air Branch

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

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or

denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

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

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

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

##### 9.10.2 Emergency Provision

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

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

- iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

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

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

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

##### 9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

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

#### 9.12.4 Duty to Provide Information

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

#### 9.13 Severability Clause

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

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Significant Emission Units

TABLE 1-1

Group/Unit #	Rated or Design Capacity (mmBtu/hr)	Fuel Type	Manufacturer	Model #/Serial #	Date Constructed
EP-1 Main Boiler	12.55	Butane/Propane Transmix or Distillate Fuel Oil	Cleaver- Brooks	CB100-300-15 #D.P./L-171651	November 1981

PROPOSED CAAPP PERMIT  
Conoco Inc., Hartford Lubricants Complex  
I.D. No.: 119050AAK  
Permit Number: 95060007  
October 28, 1999

10.2 Attachment 2 Example Certification by a Responsible Official

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

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

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I. INTRODUCTION

This source has applied for a Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Hartford Lubricants Complex is located at South Delmar Avenue in Hartford, Illinois. The source consists of various storage tanks, blend tanks, three boilers, and a packaging plant. The primary function of the source is to receive various base oils and additives and blend them to produce motor oils, gear oils, industrial oils, and fire resistant oils that are then disbursed in bulk through loading racks or packaged in drums, pails, jugs, or quart containers. In addition, a secondary function at the source is to manufacture the plastic quart containers by blending and molding raw materials into the final product and apply labels.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
Main Boiler EP-1	12.55 mmBtu/hr Cleaver-Brooks boiler with Propane/Butane Transmix as the primary fuel and distillate fuel oil as secondary fuel	November 1981	None

III. EMISSIONS

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

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	22.14
Sulfur Dioxide (SO <sub>2</sub> )	5.70
Particulate Matter (PM)	2.81
Nitrogen Oxides (NO <sub>x</sub> )	5.10
HAP, not included in VOM or PM	--
TOTAL	35.75

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

Title I

A combined Title I/CAAPP permit contains terms and conditions established by the Illinois EPA pursuant to authority found in Title I provisions, e.g., 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Notwithstanding the expiration date on the first page of the permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Page 3

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 164.

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