

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
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Project Summary  
Federally Enforceable State Operating Permit (FESOP)  
Citation Oil and Gas Corporation  
Odin, Marion County

Site Identification No.: 121813AAA  
Application No.: 07070051

Schedule

Public Comment Period Begins: February 12, 2014  
Public Comment Period Closes: March 14, 2014

Illinois EPA Contacts

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## **I. INTRODUCTION**

Citation Oil and Gas Corporation has applied for a Federally Enforceable State Operating Permit (FESOP) for its Odin, Illinois location. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

## **II. SOURCE DESCRIPTION**

Citation Oil and Gas Corporation collects, processes and sells casing head gas and associated natural gas liquids (NGLs). The emission units at this plant that require an operating permit include facility flare, associated process equipment and storage tanks. These units are sources of emissions because the combustion of residue gas and sour gas at the flare emit sulfur dioxide (SO<sub>2</sub>), and volatile organic material (VOM) to the atmosphere.

## **III. GENERAL DISCUSSION**

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source will operate this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for SO<sub>2</sub> and VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

## **IV. APPLICABLE EMISSION STANDARDS**

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has specific standards for SO<sub>2</sub> and volatile organic Material; and the natural gas

processing operation is subject to the New Source Performance Standards (NSPS) for “Onshore Natural Gas Processing” 40 CFR 60 Subpart LLL, and “Onshore Natural Gas Processing Plants” 40 CFR 60 Subpart KKK. The application shows that the plant is in compliance with applicable state and federal emission standards.

## **V. CONTENTS OF THE PERMIT**

The permit that the Illinois EPA is proposing to issue would identify the specific emission standards that apply to the emission units at the plant. As explained, processing operation is subject to 40 CFR 60 Subparts KKK and LLL, which requires operating practices, and record keeping. This plant is also subject to 40 CFR Part 63 Subparts A and HH NESHAP for oil and natural gas production facilities. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit will limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for SO<sub>2</sub> and VOM, 10 tons for an individual HAP, and 25 tons for combined HAPs.

The permit conditions would also require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant’s emissions are being properly controlled.

## **VI. REQUEST FOR COMMENTS**

It is the Illinois EPA’s preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

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 IAC Part 166.