

217/785-1705

CONSTRUCTION PERMIT -- NSPS SOURCE

PERMITTEE

Cogent Energy Solutions, LLC
Attn: Ron Newell
2627 Newman Street
Houston, Texas 77098

Application No.: 12110027

I.D. No.: 197050ABE

Applicant's Designation:

Date Received: November 29, 2012

Subject: New Crude Oil Terminal Permitting

Date Issued: February 13, 2013

Location: 301 West 2nd Street, Lockport, Will County

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of Barge Loading Dock 1 controlled by a Vapor Collection System and Vapor Combustion Unit 1, Barge Loading Dock 2 controlled by a Vapor Collection System and Vapor Combustion Unit 2, and two (2) 6,300,000 Gallon Crude Oil Internal Floating Roof Storage Tanks (Storage Tank 1 and 2) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on the emission of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the above-listed equipment being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of the conditions in this permit, the emissions of all HAPs from the above-listed equipment do not trigger the requirements of Section 112(g) of the Clean Air Act.
- b. This permit is issued based on construction of the barge loading docks and internal floating roof storage tanks not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the Illinois rules for Major Stationary Sources Construction and Modification, 35 Ill. Adm. Code Part 203. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Volatile Organic Material (VOM) from the above-listed equipment below the levels that would trigger the applicability of these rules.
- c. Operation of the equipment listed above is allowed under this construction permit for a period of twelve (12) months from the date of issuance indicated above.
- 2a. Storage Tanks 1 and 2 are subject to a New Source Performance Standard (NSPS), 40 CFR 60, Subparts A and Kb, Standards of Performance for Volatile Organic Liquid Storage Tanks (Including Petroleum Liquid Storage Tanks). The Illinois EPA is administering NSPS in Illinois on

behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.110b(a), except as provided in 40 CFR 60.110b(b), the affected facility to which 40 CFR 60 Subpart Kb applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

- b. Pursuant to 40 CFR 60.112b(a)(1), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or with a design capacity greater than or equal to 75 m³ but less than 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa shall equip each storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage tank 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 tank 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.
 - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage tank and the edge of the internal floating roof:
 - A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - iii. Each opening in a non-contact 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.
 - iv. 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.
 - v. 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.

- vi. 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.
 - vii. 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.
 - viii. 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.
 - ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- 3a. Pursuant to 35 Ill. Adm. Code 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 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 meter (1000 foot) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
4. Pursuant to 35 Ill. Adm. Code 214.301, except as further provided by 35 Ill. Adm. Code Part 214, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm.
- 5a. Pursuant to 35 Ill. Adm. Code 218.121(b)(1), no person shall cause or allow the storage of any volatile petroleum liquid (VPL) with a vapor pressure of 10.34 kPa (1.5 psia) or greater at 294.3°K (70°F) or any gaseous organic material in any stationary tank, reservoir or other container of more than 151 cubic meters (40,000 gal) capacity unless such tank, reservoir or other container is 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.

- b. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is 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 Part 201 or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
- c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission source, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.
- d. Pursuant to 35 Ill. Adm. Code 218.302(a), emissions of organic material in excess of those permitted by 35 Ill. Adm. Code 218.301 are allowable if such emissions are controlled by flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water.
- e. Pursuant to 35 Ill. Adm. Code 218.760, the requirements of 35 Ill. Adm. Code 218 Subpart GG (Marine Terminals) shall apply to sources that load or who are permitted to load gasoline or crude oil.
- f. Pursuant to 35 Ill. Adm. Code 218.762(a), except as provided at 35 Ill. Adm. Code 218.762(c), every owner or operator of a marine terminal subject to the requirements of 35 Ill. Adm. Code 218 Subpart GG shall equip each terminal with a vapor collection and control system that:
 - i. Captures the vapors displaced during the loading event and reduces overall VOM emissions by at least 95% by weight through the use of either a vapor combustion system or a vapor recovery system;
 - ii. Is maintained and operated so that it prevents visible liquid leaks, significant odors, and visible fumes in the liquid transfer and the vapor collection lines, and appurtenances during loading; and
 - iii. Has been certified as required by Coast Guard regulations found at 33 CFR 154.
- 6. This permit is issued based on the source not being subject to the New Source Performance Standards (NSPS) for Bulk Gasoline Terminals, 40 CFR 60 Subpart XX because the source is not a bulk gasoline terminal, as defined in 40 CFR 60.501.
- 7a. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for

Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 63 Subpart R because the source is not a bulk gasoline terminal, as defined in 40 CFR 63.421.

- b. This permit is issued based on the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Marine Tank Vessel Loading Operations, 40 CFR 63 Subpart Y, because the source does not have HAP emissions greater than 10 or 25 tons and does not have a crude throughput greater than 10M barrels.
 - i. Pursuant to 40 CFR 63.560(a)(1), the provisions of 40 CFR 63 Subpart Y pertaining to the Maximum Achievable Control Technology (MACT) standards in 40 CFR 63.562(b) and (d) are applicable to existing and new sources with emissions of 10 or 25 tons, as that term is defined in 40 CFR 63.561, except as specified in 40 CFR 63.560(d), and are applicable to new sources with emissions less than 10 and 25 tons, as that term is defined in 40 CFR 63.561, except as specified in 40 CFR 63.560(d).
 - ii. Pursuant to 40 CFR 63.560(b)(2), sources with throughput less than 10 M barrels and 200 M barrels, as that term is defined in 40 CFR 63.561, are not subject to the emissions standards in 40 CFR 63.562(c) and (d).
- c. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE, because the organic liquids distribution (OLD) (non-gasoline) operation is not located at, or is not part of, a major source of HAP emissions.
- 8a. This permit is issued based on the storage tanks not being subject to 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL) Pursuant to 35 Ill. Adm. Code 218.119(e), the limitations of 35 Ill. Adm. Code 218.120 shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gallon) capacity or greater, except to vessels storing petroleum liquids.
 - b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
 - c. This permit is issued based on the storage tanks not being subject to 35 Ill. Adm. Code 218.123(b), Petroleum Liquid Storage Tanks. Pursuant to 35 Ill. Adm. Code 218.123(a)(5), the requirements of 35 Ill. Adm. Code 218.123(b) shall not apply to any stationary storage tank subject to new source performance standards for storage vessels of petroleum liquid, 40 CFR 60, as regulations promulgated by the U.S. Environmental Protection Agency under Section 111 of the Clean Air Act (42 USC 7411), as amended. The provisions of Section 111 of the Clean Air Act ... are applicable in this State and are enforceable under [The

Environmental Protection Act] (Ill. Rev. Stat., Ch. 111 1/2, par. 1009.1(b)) [415 ILCS 5/9.1(b)].

9. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- 10a. Pursuant to 35 Ill. Adm. Code 218.445 and 218.766, the owner or operator of a petroleum refinery or a marine terminal shall:
 - i. Develop a monitoring program plan consistent with the provisions of 35 Ill. Adm. Code 218.446;
 - ii. Conduct a monitoring program consistent with the provisions of 35 Ill. Adm. Code 218.447;
 - iii. Record all leaking components which have a volatile organic material concentration exceeding 10,000 ppm consistent with the provisions of 35 Ill. Adm. Code 218.448;
 - iv. Identify each component consistent with the monitoring program plan submitted pursuant to 35 Ill. Adm. Code 218.446;
 - v. Repair and retest the leaking components as soon as possible within 22 days after the leak is found, but no later than June 1 for the purposes of 35 Ill. Adm. Code 218.447(a)(1), unless the leaking components cannot be repaired until the unit is shut down for turnaround; and
 - vi. Report to the Illinois EPA consistent with the provisions of 35 Ill. Adm. Code 218.449.
- b. Pursuant to 35 Ill. Adm. Code 218.762(b), from May 1 to September 15, the regulatory control period, every owner or operator of a marine terminal subject to the requirements of 35 Ill. Adm. Code 218 Subpart GG shall load gasoline or crude oil only into marine vessels that are:
 - i. Equipped with vapor collection equipment that has been certified as required by Coast Guard regulations found at 46 CFR 39;
 - ii. Connected to the vapor collection system; and
 - iii. Vapor-tight as described in the following 35 Ill. Adm. Code 218.762(b)(3)(A), (b)(3)(B), (b)(3)(C), or (b)(3)(D):
 - A. The owner or operator of the marine terminal shall load each marine vessel with a vacuum assisted vapor collection

system, instrumented in such a way that the pump(s) transferring gasoline or crude oil to the marine vessel will not operate unless the vapor collection system is properly connected and properly operating.

- B. As an alternative to 35 Ill. Adm. Code 218.762(b)(3)(A), the owner or operator of the marine terminal shall obtain documentation as described in 35 Ill. Adm. Code 218.770(b) that the marine vessel has been vapor-tightness tested within either the preceeding 12 months or the preceding 14 months, if the test is being conducted as part of the Coast Guard's reinspection of the vessel required under 46 CFR 31.10-17, using Method 21 of Part 60, Appendix A, as described in 35 Ill. Adm. Code 218.768(b).
 - C. If there is no documentation of a successful leak test conducted on the marine vessel in either the preceeding 12 months or in the preceding 14 months, if the test is being conducted as part of the Coast Guard's reinspection of the vessel required under 46 CFR 31.10-17, the owner or operator of the marine terminal shall require that a leak test of the marine vessel be conducted during the final 20 percent of loading of the marine vessel or shall not load the vessel. The test shall be conducted when the marine vessel is being loaded at the maximum liquid transfer rate for that transfer operation. The owner or operator of the marine terminal shall require that the documentation described in 35 Ill. Adm. Code 218.770(b) is completed prior to the departure of the vessel.
 - D. If the marine vessel has failed its most recent vapor-tightness leak test at the marine terminal, before the marine vessel can be loaded, the owner or operator of the marine terminal shall require that the owner or operator of the marine vessel provide documentation that the leaks detected during the previous vapor-tightness leak test have been repaired and that the marine vessel has been vapor-tightness tested since the leak(s) has been repaired pursuant to 35 Ill. Adm. Code 218.762(b)(3)(B).
- c. Pursuant to 35 Ill. Adm. Code 218.766, the owner or operator of a marine terminal shall comply with the requirements of 35 Ill. Adm. Code 218.445 with respect to all equipment associated with the vapor collection and control system required by 35 Ill. Adm. Code 218.762(a).
- 11a. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the vapor combustion units such that the vapor combustion units are kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
 - b. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to

minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

- c. This permit is issued based on the source handling (unloading, storing, and loading) only crude oil. The transfer or handling of gasoline or any volatile organic liquid at this source will require that the Permittee first obtain a construction permit from the Illinois EPA and the demonstration of compliance with all applicable requirements.
 - d. Each vapor collection system and vapor combustion unit shall be in operation at all times when the associated barge loading dock is in operation and emitting air contaminants.
 - e. Each vapor combustion unit's combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation of each associated barge loading dock.
- 12a. Emissions and operation of equipment shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Throughput (Gal/Yr)</u>	<u>Volatile Organic Material Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Storage Tank 1	2,023,560,000	0.77	7.71
Storage Tank 2	2,023,560,000	0.77	7.71
Tank Roof Landings	-----	3.10	3.10
Loading Rack 1 & 2	2,023,560,000	1.01	10.10
Fugitives (Valves, Pump seals etc.)	-----	0.43	<u>4.32</u>
		Total:	32.94

These limits are based on standard emission factors (Section 7.1, AP-42, Fifth Edition, Volume I, November 2006 or TANKS program (Version 4.09D, October 3, 2005 for breathing losses, working losses, and Section 7.1.3.2.2 AP-42, Fifth Edition, November 2006 for roof landing loss) and Section 5.2 AP42, Fifth Edition, January 1995) using the maximum throughput, the respective vapor pressure of the materials to be stored and 99% control efficiency for the vapor combustion units.

- b. Operation of and emissions from the combustion of natural gas in the vapor combustion units shall not exceed the following limits:
 - i. Natural Gas Usage: 20 mmscf/month and 200 mmscf/year;
 - ii. Emissions from the combustion of natural gas:

<u>Pollutant</u>	<u>Emission Factor (lbs/mmscf)</u>	<u>Emissions (Tons/Mo)</u>	<u>(Tons/Yr)</u>
Carbon Monoxide (CO)	306	3.06	30.60
Nitrogen Oxides (NO _x)	204	2.04	20.40

Particulate Matter (PM)	7.6	0.08	0.76
Sulfur Dioxide (SO ₂)	0.6	0.01	0.06
Volatile Organic Material (VOM)	5.5	0.06	0.55

These limits are based on the maximum fuel usage and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998). Nitrogen oxides and carbon monoxide emissions are based on vendor guarantee.

- c. Operation and emissions of the crude oil vapors combustion in the vapor combustion units shall not exceed the following limits:

<u>Pollutant</u>	<u>Emission Factor</u>		<u>Emissions</u>	
	<u>(lbs/mmBtu)</u>	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>	
Nitrogen Oxides (NO _x)	0.2	0.51	5.1	
Carbon Monoxide (CO)	0.3	0.77	7.7	
Particulate Matter	0.0078	0.02	0.2	
Sulfur Dioxide (SO ₂)	0.09	0.24	2.4	

These limits are based on the maximum firing rate of the VCU (51,182 mmBtu/year) and standard emission factors (Table 1.5-1, AP-42, , Fifth Edition, Volume I, Updated, July 2008). NO_x and CO emissions are based on vendor guarantee.

- d. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the barge loading docks and internal floating roof storage tanks shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.99 tons/month and 19.0 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of Section 112(g) of the Clean Air Act, the NESHAP for Marine Tank Vessel Loading Operations, 40 CFR 63 Subpart Y, and the NESHAP for Organic Liquids Distribution (Non-Gasoline), 40 CFR 63 Subpart EEEE.
- e. Compliance with the annual limits of this permit 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).
- 13a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing

methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

- ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.
- b. Testing required by Conditions 14 and 15 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.
- 14. Pursuant to 35 Ill. Adm. Code 212.110(c), upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 Ill. Adm. Code Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA.
- 15a. Pursuant to 35 Ill. Adm. Code 218.768(a), compliance with 35 Ill. Adm. Code 218.762(a)(2) shall be determined by visual inspection and by the leak detection methods contained in 35 Ill. Adm. Code 218.105(g).
- b. Pursuant to 35 Ill. Adm. Code 218.768(c), for all other control devices used to comply with 35 Ill. Adm. Code 218.762(a)(1), compliance shall be determined by methods described in 35 Ill. Adm. Code 218.105(d) and (f).
- c. Pursuant to 35 Ill. Adm. Code 218.768(d), Compliance with 35 Ill. Adm. Code 218.762(b)(3) shall be determined by one of the methods described in 35 Ill. Adm. Code 218.768:
 - i. A marine vessel loaded in accordance with 35 Ill. Adm. Code 218.762(b)(3)(A) through the use of a vacuum assisted vapor collection system is assumed to be vapor-tight for the purposes of 35 Ill. Adm. Code 218 Subpart GG.
 - ii. A vapor-tightness test for marine vessels shall be conducted to include the final 20 percent of loading of each product tank of the marine vessel, and it shall be applied to any potential sources of vapor leaks on the vessel pursuant to Method 21 of 40 CFR 60, Appendix A. A reading of 10,000 ppmv or greater as methane shall constitute a leak.

- iii. As an alternative to 35 Ill. Adm. Code 218.768(d)(2), an owner or operator of a marine terminal may use the vapor-tightness test described in 40 CFR 61.304(f).
 - d. Pursuant to 35 Ill. Adm. Code 218.768(e), when in the opinion of the Illinois EPA or USEPA it is necessary to conduct testing to demonstrate compliance with or verify effectiveness of the vapor collection and control system required by 35 Ill. Adm. Code 218.762(a), (c)(1), or (c)(3), the owner or operator of a marine terminal shall, at its own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.768 (a), (b), or (c), as applicable.
- 16a. Within 180 days after achieving the maximum production rate at which the Barge Loading Docks will be operated, the VOM emissions from the Barge Loading Docks shall be measured during conditions which are representative of maximum emissions. These tests shall determine compliance with 35 Ill. Adm. Code 218.762(a).
- b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A, and 40 CFR 61, Appendix B, for USEPA test methods.

Sample and Velocity Traverses for Stationary Sources	USEPA Method 1
Sample and Velocity Traverses for Stationary Sources with Small Stacks or Ducts	USEPA Method 1A
Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube)	USEPA Method 2
Direct Measurement of Gas Volume Through Pipes and Small Ducts	USEPA Method 2A
Determination of Gas Velocity and Volumetric Flow Rate in Small Stacks or Ducts (Standard Pitot Tube)	USEPA Method 2C
Measurement of Gas Volume Flow Rates in Small Pipes and Ducts	USEPA Method 2D
Gas Analysis for the Determination of Dry Molecular Weight	USEPA Method 3
Determination of Moisture Content in Stack Gases	USEPA Method 4
Measurement of Gaseous Organic Compound Emissions by Gas Chromatography	USEPA Method 18
Determination of Volatile Organic Compounds Leaks	USEPA Method 21
Determination of Total Gaseous Nonmethane Organic Emissions as Carbon	USEPA Method 25
Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer	USEPA Method 25A*

* USEPA Method 25A may only be used if outlet VOM concentration is less than 50 ppm as carbon (non-methane).

- c. At least 30 days prior to the actual date of testing, the Permittee shall submit a written test plan to the Illinois EPA, Compliance Section. This plan shall include as a minimum:

- i. The name (or other identification) of the emission unit(s) to be tested and the name and address of the facility at which they are located;
 - ii. The name and address of the independent testing service(s) performing the tests, with the names of the individuals who may be performing sampling and analysis and their experience with similar tests;
 - iii. The specific determinations of emissions and/or performance which are intended to be made, including the site(s) in the ductwork or stack at which sampling will occur;
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, maximum operating rate, minimum control performance, the levels of operating parameters for the emission unit, including associated control equipment, at or within which compliance is intended to be shown, and the means by which the operating parameters will be determined;
 - v. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods. The specific sampling, analytical and quality control procedures which will be used, with an identification of the standard methods upon which they are based;
 - vi. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification;
 - vii. Any proposed use of an alternative test method, with detailed justification; and
 - viii. The format and content of the Source Test Report.
- d. The Permittee shall provide the Illinois EPA with written notification of testing at least thirty (30) days prior to testing to enable the Illinois EPA to have an observer present. This notification shall include the name of emission unit(s) to be tested, scheduled date and time, and contact person with telephone number.
 - e. If testing is delayed, the Permittee shall promptly notify the Illinois EPA by facsimile, at least 5 days prior to the scheduled date of testing or immediately, if the delay occurs in the 5 days prior to the scheduled date. This notification shall also include the new date and time for testing, if set, or a separate notification shall be sent with this information when it is set.
 - f. The Permittee shall submit the Final Test Report(s) for these tests accompanied by a cover letter stating whether or not compliance was shown, to the Illinois EPA without delay, within 30 days after the test results are compiled, but no later than 60 days after the date of testing or sampling. The Final Test Report shall include as a minimum:

- i. General information describing the test, including the name and identification of the emission source which was tested, date of testing, names of personnel performing the tests, and Illinois EPA observers, if any;
 - ii. A summary of results;
 - iii. Description of test procedures and method(s), including description and map of emission units and sampling points, sampling train, testing and analysis equipment, and test schedule;
 - iv. Detailed description of test conditions, including:
 - A. List and description of the equipment (including serial numbers or other equipment specific identifiers) tested and process information (i.e., mode(s) of operation, process rate/throughput, fuel or raw material consumption rate, and heat content of the fuels);
 - B. Control equipment information (i.e., equipment condition and operating parameters) during testing; and
 - C. A discussion of any preparatory actions taken (i.e., inspections, maintenance and repair).
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration. Identification of the applicable regulatory standards that the testing was performed to demonstrate compliance with, a comparison of the test results to the applicable regulatory standards, and a statement whether the test(s) demonstrated compliance with the applicable standards;
 - vi. An explanation of any discrepancies among individual tests, failed tests or anomalous data;
 - vii. The results and discussion of all quality control evaluation data, including a copy of all quality control data; and
 - viii. The applicable operating parameters of the pollution control device(s) during testing (temperature, pressure drop, scrubbant flow rate, etc.), if any.
- g. Satisfactory completion of this test so as to demonstrate compliance with applicable emission standards is a prerequisite to issuance of an operating permit, pursuant to 35 Ill. Adm. Code 201.160(b).
- 17a. Pursuant to 40 CFR 60.113b(a), after installing the control equipment required to meet 40 CFR 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:

- i. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- ii. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Illinois EPA or USEPA in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- iii. For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):
 - A. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(4) at least every 5 years; or
 - B. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(2).
- iv. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR 60.113b(a)(2) and (a)(3(ii)) and at intervals no greater than 5 years in the case of vessels specified in 40 CFR 60.113b(a)(3)(i).

- 18a. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(A)(i), an owner or operator that uses an afterburner or carbon adsorber to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the control device is in use except as provided in 35 Ill. Adm. Code 218.105(d)(3). The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner.
- b. Pursuant to 35 Ill. Adm. Code 218.105(d)(2)(B), an owner or operator must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device, such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or $\pm 0.5^{\circ}\text{C}$, whichever is greater.
- c. Pursuant to 35 Ill. Adm. Code 218.446 and 218.766, the owner or operator of a petroleum refinery or a marine terminal shall prepare a monitoring program plan which contains, at a minimum:
- i. An identification of all refinery or marine terminal components and the period in which each will be monitored pursuant to 35 Ill. Adm. Code 218.447;
 - ii. The format for the monitoring log required by 35 Ill. Adm. Code 218.448;
 - iii. A description of the monitoring equipment to be used pursuant to 35 Ill. Adm. Code 218.447; and
 - iv. A description of the methods to be used to identify all pipeline valves, pressure relief valves in gaseous service and all leaking components such that they are obvious to both refinery personnel performing monitoring and Agency personnel performing inspections.
- c. Pursuant to 35 Ill. Adm. Code 218.447(a) and 218.766, the owner or operator of a petroleum refinery or a marine terminal subject to 35 Ill. Adm. Code 218.445 shall, for the purpose of detecting leaks, conduct a component monitoring program consistent with the following provisions:
- i. Test once between March 1 and June 1 of each year, by methods referenced in 35 Ill. Adm. Code 218.105(g), all pump seals, pipeline valves in liquid service and process drains;
 - ii. Test once each quarter of each calendar year, by methods referenced in 35 Ill. Adm. Code 218.105(g), all pressure relief valves in gaseous service, pipeline valves in gaseous service and compressor seals;

- iii. Inaccessible valves may be tested once each calendar year instead of once each quarter of each calendar year;
 - iv. Observe visually all pump seals weekly;
 - v. Test immediately any pump seal from which liquids are observed dripping;
 - vi. Test any relief valve within 24 hours after it has vented to the atmosphere; and
 - vii. Test immediately after repair any component that was found leaking.
- d. Pursuant to 35 Ill. Adm. Code 218.447(c), the Illinois EPA or the USEPA may require more frequent monitoring than would otherwise be required by 35 Ill. Adm. Code 218.447(a) for components which are demonstrated to have a history of leaking.
- 19a. Pursuant to 40 CFR 60.7(b), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- b. Pursuant to 40 CFR 60.7(f), any owner or operator subject to the provisions of 40 CFR Part 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records.
- 20a. Pursuant to 40 CFR 60.115b, the owner or operator of each storage vessel as specified in 40 CFR 60.112b(a) shall keep records and furnish reports as required by 40 CFR 60.115(a), (b), or (c) depending upon the control equipment installed to meet the requirements of 40 CFR 60.112b. The owner or operator shall keep copies of all reports and records required by 40 CFR 60.115, except for the record required by 40 CFR 60.115 (c)(1), for at least 2 years. The record required by 40 CFR 60.115(c)(1) will be kept for the life of the control equipment.
- b. Pursuant to 40 CFR 60.115b(a)(2), after installing control equipment in accordance with 40 CFR 60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall keep a record of each inspection performed as required by 40 CFR 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

- c. Pursuant to 40 CFR 60.116b(a), the owner or operator shall keep copies of all records required by 40 CFR 60.116b, except for the record required by 40 CFR 60.116b(b), for at least 2 years. The record required by 40 CFR 60.116b(b) will be kept for the life of the source.
 - d. Pursuant to 40 CFR 60.116b(b), the owner or operator of each storage vessel as specified in 40 CFR 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
21. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
22. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.
- 23a. Pursuant to 35 Ill. Adm. Code 218.448(a) and 218.766, the owner or operator of a petroleum refinery or a marine terminal shall maintain a leaking components monitoring log which shall contain, at a minimum, the following information:
- i. The name of the process unit where the component is located;

- ii. The type of component (e.g., valve, seal);
 - iii. The identification number of the component;
 - iv. The date on which a leaking component is discovered;
 - v. The date on which a leaking component is repaired;
 - vi. The date and instrument reading of the recheck procedure after a leaking component is repaired;
 - vii. A record of the calibration of the monitoring instrument;
 - viii. The identification number of leaking components which cannot be repaired until turnaround; and
 - ix. The total number of components inspected and the total number of components found leaking during that monitoring period.
- b. Pursuant to 35 Ill. Adm. Code 218.448(b), copies of the monitoring log shall be retained by the owner or operator for a minimum of two years after the date on which the record was made or the report prepared.
- c. Pursuant to 35 Ill. Adm. Code 218.448(c), copies of the monitoring log shall be made available to the Illinois EPA, upon verbal or written request, at any reasonable time.
- d. Pursuant to 35 Ill. Adm. Code 218.770(a), the owner or operator of sources complying with 35 Ill. Adm. Code 218.762(a) and (b), or (c)(1), or (c)(3) shall maintain records regarding the marine terminal, and each time a marine vessel is loaded during the regulatory control period. The records shall include but are not limited to:
- i. The date(s) and the time(s) at which the marine vessel was loaded from the marine terminal;
 - ii. The name, type, identification number, and owner of the vessel loaded;
 - iii. The type and amount of liquid loaded into the marine vessel;
 - iv. Records of any leaks found, repair attempts, and the results of the required fugitive monitoring and maintenance program, including appropriate dates, test methods, instrument readings, repair results, and corrective action taken as required by 35 Ill. Adm. Code 218.762(a)(2) and 218.766;
 - v. A copy of the Coast Guard certification demonstrating that the marine terminal's vapor collection and control system has been certified as required by Coast Guard regulations found at 33 CFR 154; and
 - vi. A copy of the Coast Guard certification demonstrating that the marine vessel has been inspected and certified as required by

Coast Guard regulations found at 46 CFR 39. If a copy of the Coast Guard certificate is not available at the time of loading, then the date that the marine vessel was last inspected and the authorization that the marine vessel has functioning vapor control equipment must be recorded from the certificate. Further, a copy of the certificate must be obtained by the owner or operator of the marine terminal within 21 days after the loading event.

- e. Pursuant to 35 Ill. Adm. Code 218.770(b), owners or operators complying with 35 Ill. Adm. Code 218.762(b)(3)(B), (b)(3)(C), or (b)(3)(D) shall additionally maintain the following records concerning the vapor-tightness of the marine vessel:
 - i. Test title;
 - ii. Owner of the marine vessel tested;
 - iii. The identification number of the marine vessel tested;
 - iv. Testing location;
 - v. Tester name and signature;
 - vi. Witnessing inspector, name, signature, and affiliation; and
 - vii. Test results.
- f. Pursuant to 35 Ill. Adm. Code 218.770(d), owners or operators certifying compliance under 35 Ill. Adm. Code 218.764(c) shall maintain the records specified in 35 Ill. Adm. Code 218.770(a)(1), (a)(2), and (a)(3) above.
- g. Pursuant to 35 Ill. Adm. Code 218.770(e), all records required by 35 Ill. Adm. Code 218.770(a), (b), (c), and (d) shall be maintained for at least three years and shall be made available to the Illinois EPA upon request.
- 24a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Records addressing use of good operating practices for the vapor combustion units:
 - A. Records for periodic inspection of the vapor combustion units with date, individual performing the inspection, and nature of inspection; and
 - B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
 - ii. The throughput of crude oil through the loading racks (gallons/month and gallons/year);

- iii. The throughput of crude oil stored in each storage tank (gallons/month and gallons/year);
 - iv. Natural gas consumption for the vapor combustion units (mmscf/month and mmscf/year); and
 - v. Monthly and annual emissions of CO, NO_x, PM, SO₂, VOM, and HAPs from the barge loading docks and internal floating roof storage tanks with all supporting calculations or measurements, (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 25a. Pursuant to 40 CFR 60.7(a), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA or USEPA and the owner or operator of a source, electronic notification, as follows:
- i. A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
 - ii. A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
 - iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Illinois EPA or USEPA may request additional relevant information subsequent to this notice.
- 26a. Pursuant to 40 CFR 60.113b(a)(5), after installing the control equipment required to meet 40 CFR 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall notify the Illinois EPA or USEPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR 60.113b(a)(1) and (a)(4) to afford the Illinois EPA

or USEPA the opportunity to have an observer present. If the inspection required by 40 CFR 60.113b(a)(4) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Illinois EPA or USEPA at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Illinois EPA or USEPA at least 7 days prior to the refilling.

- b. Pursuant to 40 CFR 60.115b(a), after installing control equipment in accordance with 40 CFR 60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements.
 - i. Furnish the Illinois EPA or USEPA with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).
 - ii. If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Illinois EPA or USEPA within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.
 - iii. After each inspection required by 40 CFR 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to the Illinois EPA or USEPA within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made.
- 27. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.
- 28a. Pursuant to 35 Ill. Adm. Code 218.449 and 218.766, the owner or operator of a petroleum refinery or a marine terminal shall:
 - i. Submit a report to the Illinois EPA prior to the 1st day of both July and September listing all leaking components identified pursuant to 35 Ill. Adm. Code 218.447 but not repaired within 22 days, all leaking components awaiting unit turnaround, the total

number of components inspected and the total number of components found leaking;

- ii. Submit a signed statement with the report attesting that all monitoring and repairs were performed as required under 35 Ill. Adm. Code 218.445 through 218.448.
 - b. Pursuant to 35 Ill. Adm. Code 218.768(f), an owner or operator of a marine terminal planning to conduct a VOM emissions test to demonstrate compliance with 35 Ill. Adm. Code 218.762(a), (c)(1), or (c)(3) shall notify the Illinois EPA of that intent not less than 30 days before the planned initiation of the tests so that the Illinois EPA may observe the test.
- 29a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

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

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

It should be noted that during the analysis of this permit application, it was determined that your facility has the potential to emit more than 100 tons/year of volatile organic material (VOM), 10 tons/year of a single hazardous air pollutant (HAP) and 25 tons/year of a combination of HAPs and will be classified as a major source under the Clean Air Act Permit Program (CAAPP). To avoid the CAAPP permitting requirements, you may want to consider immediately applying for a Federally Enforceable State Operating Permit (FESOP). A FESOP is an operating permit which contains federally enforceable limits in the form of permit conditions which effectively restrict the potential emissions of a source to below major source thresholds, thereby excluding the source from a CAAPP. The necessary application forms are available on the Illinois EPA's website at <http://www.epa.state.il.us/air/caapp/permit-forms.html>.

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If you have any questions on this, please call David Hulskotter at 217/785-1705.

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

Date Signed: _____

ECB:DWH:psj

cc: Illinois EPA, FOS Region 1