

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Safety – Kleen Systems, Inc – Dolton Recycle Center
633 East 138th Street
Dolton, Illinois 60419

Illinois EPA ID Number: 031069AAG
Application Number: 95120114
Application Type: CAAPP Renewal

Start of Public Comment Period: July 23, 2008
Close of Public Comment Period: August 22, 2008

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(This Project Summary generally describes the source and explains the draft permit. This document has been prepared pursuant to Section 39.5(8)(b) of the Illinois Environmental Protection Act, which requires "a statement that sets forth the legal and factual basis for the draft CAAPP permit conditions.")

I. INTRODUCTION

This source has applied for renewal of its Clean Air Act Permit Program (CAAPP) operating permit. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by Title V of the federal Clean Air Act and Section 39.5 of Illinois' Environmental Protection Act. The conditions in a CAAPP permit are enforceable by the Illinois Environmental Protection Agency (Illinois EPA), the USEPA, and the public. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A CAAPP permit contains conditions identifying the applicable state and federal air pollution control requirements that apply to a source. The permit also establishes emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit. Further explanations of the specific provisions of the draft CAAPP permit are contained in the attachments to this document, which also identify the various emission units at the source.

II. GENERAL SOURCE DESCRIPTION

a. Nature of source

The Safety – Kleen Systems, Inc. – Dolton Recycle Center functions as a storage, recycling and reclamation facility for a variety of used chemicals and solvents, solvent mixtures, solid and semi – solid materials, aqueous chemicals and other organic wastes.

b. Ambient air quality status for the area

The source is located in an area that is currently designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment) PM_{2.5}, PM₁₀ (moderate nonattainment) and attainment or unclassifiable for all other criteria pollutants (CO, lead, NO₂, SO₂).

c. Major source status

1. The source, Safety – Kleen Systems, Inc, requires a CAAPP permit as a major source of HAP emissions.
2. The source, Safety – Kleen Systems, Inc, requires a CAAPP permit because the source is subject to a standard, limitation, or other requirement under Section 111 (NSPS) or Section 112 (HAPS) of the CAA for which USEPA requires a CAAPP

permit, pursuant to 40 CFR 70.3(a)(2)[Section 39.5 (2)(a)(ii) of the Act]. Specifically, this source is subject to 40 CFR 60, Subpart Dc.

3. The source, Safety – Kleen Systems, Inc, requires a CAAPP permit because the source is subject to a standard, limitation, or other requirement under section 112 (HAPS) of the CAA for which USEPA requires a CAAPP permit, pursuant to 40 CFR 70.3(a)(3) [Section 39.5(2)(a)(ii)of the Act]. Specifically, this source is subject to 40 CFR 63, Subpart DD

d. Source Emissions

The following table lists annual emissions of criteria pollutants from this source, as reported in the Annual Emission Reports sent to the Illinois EPA.

Pollutant	Annual Emissions (tons)			
	2006	2005	2004	2003
CO	4.65	5.30	4.65	4.94
NO _x	7.78	8.49	7.57	8.02
PM	0.20	0.23	0	0
SO ₂	0.03	0.04	0.03	0.03
VOM	43.92	35.66	23.80	16.49

III. NEW SOURCE REVIEW/TITLE I CONDITIONS

This draft permit contains terms and conditions that address the applicability of permit programs for new and modified sources under Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the draft permit by T1, T1R, or T1N. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this draft permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new conditions or revise such conditions in a Title I permit, those conditions are consistent with the information provided in the CAAPP application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This draft permit would establish newly revised Title I requirements.

IV. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source. In addition, the draft permit requires the source to certify its compliance status on an annual basis.

V. PROPOSED ILLINOIS EPA ACTION/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.

ATTACHMENT 1: Summary of Source-Wide Requirements

The following table indicates the source-wide emissions control programs and planning requirements that are applicable to this source. These programs are addressed in Sections 5 and 6 of the draft permit.

Program/Plan	Applicable
Emissions Reduction Market System (ERMS)	Yes
Nitrogen Oxides (NO _x) Trading Program	No
Acid Rain Program	No
Compliance Assurance Monitoring (CAM) Plan	No
Fugitive Particulate Matter (PM) Operating Program	No
Risk Management Plan (RMP)	Yes
PM ₁₀ Contingency Measure Plan	No

The ERMS is a market-based program designed to reduce VOM emissions from stationary sources located in the Chicago ozone non-attainment area in order to contribute to reasonable further progress toward attainment (35 IAC Part 205). If applicable, this program is further described in Section 6.0 of the draft permit, including the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS.

Compliance Assurance Monitoring (CAM) is a program for pollutant-specific emission units which use an add-on control device to achieve compliance with an emission limitation or standard. A CAM plan is required for such units that have potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than major source threshold levels, and are not specifically exempt by 40 CFR Part 64. Subject units and the CAM plans are identified in Attachment 3 of the draft permit.

Risk Management Plan: This stationary source, as defined in 40 CFR 68.3, is subject to 40 CFR Part 68, the federal regulations for Chemical Accident Prevention. This condition is imposed in this permit pursuant to 40 CFR 68.215 (a) (1). See Section 5.3.4, Risk Management Plan in the draft permit.

ATTACHMENT 2: Summary of Requirements for Specific Emission Units

The following tables include information on the requirements that apply to significant emission units at this source. The requirements are found in Section 7 of the draft permit, which is further divided into subsection, i.e., Section 7.1, 7.2, etc., for the different categories of units at the source. A separate table is provided for each subsection in Section 7 of the draft permit. An explanation of acronyms and abbreviations is contained in Section 2 of the draft permit.

Table 1 (Section 7.1 of the draft permit)

Emission Units – Distillation Column; Shredder System; LUWA 1, 2, 3 ; Pot Still1 1, 2; Drum Handling 1, 2; Railcar Transfer Station, Fuel Transfer Station, Mineral Spirits Transfer Station	
Description	Drum Handling, evaporation and fractional distillation equipment used to recycle and reclaim a variety of used chemicals and solvents, solvent mixtures, solid and semi – solid materials, aqueous chemicals and other organic wastes. A thermal oxidizer and flare are used to destroy VOM emissions before released to the atmosphere. Condensers are also used to minimize VOM emissions.
Date Constructed	LUWA 1: 1972, Pot Stills: 1973, Distillation Column: 1984, Drum Handling: 1985,1989, LUWA 2,3: 1990, Shredder System: 1996
Emission Control Equipment	Thermo Oxidizers, Back-up Flares and condensers: Requirements for control devices can be found in Section 7.1.10 (f)g(h)and Section 7.1.8 (c)(d)(e) in the draft permit.
Applicable Rules and Requirements	
Emission Standards	40 CFR 63 Subpart DD 35 IAC 218 Subparts G and TT
Streamlining	N/A
Title I Conditions	The draft permit contains limits on operation and emissions in Conditions 7.1.5 and 7.1.6. These limits were incorporated from Permit 95120114.
Non-applicability	<ul style="list-style-type: none"> The affected off – site waste and recovery operations are not subject to the New Source Performance Standards (NSPS) for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 60 Subparts VV, III, and RRR; the National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 63, Subparts F,G,H and I; or the Organic Material Emission Standards and Limitations for the Chicago Area, 35 IAC 218, Subparts Q and RR, because the affected off – site waste and recovery operations are not engaged in the manufacture of organic chemicals.

Emission Units – Distillation Column; Shredder System; LUWA 1, 2, 3 ; Pot Still 1, 2; Drum Handling 1, 2; Railcar Transfer Station, Fuel Transfer Station, Mineral Spirits Transfer Station	
Non-applicability (Continued)	<ul style="list-style-type: none"> • The affected off – site waste and recovery operations are not subject to the National Emission Standards for Hazardous Air Pollutants for benzene, 40 CFR 61, Subparts J, Y, BB and FF because affected off – site waste and recovery operations are not operating in benzene service and the facility is not a benzene production facility, bulk terminal, chemical manufacturing plant, coke by – product recovery plant, or petroleum refinery. • The affected off – site waste and recovery operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected off – site waste and recovery operations are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2 (b) (1)(i).
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Testing Requirements are found in Section 7.1.7.
Emissions Monitoring	Monitoring of control equipment is found in Section 7.1.8.
Operational Monitoring	Operational monitoring of controls is found in Section 7.1.8(c)(d).
Inspections	The inspections are used to demonstrate compliance and can be found in Section 7.1.8.
Recordkeeping	Recordkeeping Requirements are found in Section 7.1.9.
Reporting	
Prompt Reporting	N/A
Other Reporting	Reporting requirements are found in Section 7.1.10(c).

Table 2 (Section 7.2 of the draft permit)

Emission Unit – Drum Filling 1,2; Finished Product Transfer Station	
Description	Drum Filling of 5 gallon (Drum Fill 1) and 55 gallon (Drum Fill 2) drums with recycled and reclaimed chemicals and solvents, solvent mixtures, aqueous chemicals, and other organic materials. The process units are not engaged in off – site recovery operation.
Date Constructed	Drum Filling: 1990
Emission Control Equipment	Drum Filling 1,2: Thermo Oxidizer
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • The “affected drum fill operations” for the purpose of these unit–specific conditions are units subject to 35 IAC 218 Subparts G and TT. As of the “date issued” as shown on page 1 of this permit, the affected drum fill operations are identified in Conditions 7.2.1 and 7.1.2. • The “affected load out operations” for the purpose of these unit specific conditions, are units subject to 35 IAC 218 Subpart G. As of the “date issued” shown on page 1 of the draft permit, the affected load out operations are identified in Conditions 7.2.1 and 7.2.2. • The affected load out operations are subject to 35 IAC 218.122 (a) because the load out operations have a through – put capacity greater than 151 cubic meters per day (40,000 gallons/day).
Streamlining	N/A
Title I Conditions	The draft permit contains limits on operation and emissions in Conditions 7.2.5 and 7.2.6. These limits were incorporated from Permit 95120114.
Non-applicability	<ul style="list-style-type: none"> • The affected drum fill and load out operations are not subject to 40 CFR 63 Subpart DD “National Emission Standards for Off – Site Waste and Recovery Operations”, because the affected drum fill operations do not receive off – site materials as defined in 40 CFR 63.680 (b) and the affected load out operations are not as affected source as defined in 40 CFR 63.680 (c).

Emission Unit – Drum Filling 1,2; Finished Product Transfer Station	
Non-applicability (Continued)	<ul style="list-style-type: none"> • The affected drum fill and load out operations are not subject to the New Source Performance Standards (NSPS) for the Synthetic Organic Chemicals and Manufacturing Industry, 40 CFR 60, Subparts VV, III, NNN and RRR; the National Emission Standards For Hazardous Air Pollutants for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 63, Subparts F,G,H, and I; or the Organic Material Emission Standards and Limitations for the Chicago Area, 35 IAC 218, Subparts Q and RR, because the affected drum fill operations are not engaged in the manufacture of organic chemicals. • The affected drum fill and load out operations are not subject to the National Emission Standards for Hazardous Air Pollutants for benzene, 40 CFR 61, Subparts J, Y, BB and FF, because the affected drum fill operations are not operating in benzene service and the facility is not a benzene production facility, bulk terminal, chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery. • The affected load out operations are not subject to 35 IAC 218 Subpart TT, because the affected load out operations are regulated by 35 IAC 218 Subpart B. [35 IAC 218.980(a)(1)]
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Testing Requirements are found in Section 7.2.7
Emissions Monitoring	Emissions requirements are found in Section 7.2.6, emission compliance is found in Section 7.2.12 Monitoring of control equipment (thermo oxidizer) is found in Section 7.2.5 and 7.1.8 (c)(d)(e).
Operational Monitoring	Operational monitoring is found in Section 7.2.5 and operational monitoring of the thermo oxidizer is found in Section 7.1.8 (d).
Inspections	N/A
Recordkeeping	Recordkeeping Requirements are found in Section 7.2.9.
Reporting	
Prompt Reporting	Reporting requirements are found in Section 7.2.10.
Other Reporting	N/A

Table 3 (Section 7.3 of the draft permit)

Emission Unit – Tank Farms 4, 5, 6, 7, 8, 9, 14	
Description	Storage Tanks used in the recycling and reclaiming of a variety of used chemicals and solvents, solvent mixtures, solid and semi – solid materials, aqueous chemicals and other organic wastes. Condensers are used to minimize VOM emissions.
Date Constructed	Tank Farms 4,5,6: 1989, 1990 Tank Farms 7,8,9,14: 1990
Emission Control Equipment	Tank Farms 4,5: Condenser (C-18) Tank Farms 6,14: Thermo Oxidizer (C-22)
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • The “affected off site waste and recovery storage tanks” for the purpose of these units – specific conditions, are units subject to 40 CFR 63 Subpart DD “National Emission Standards for Off–site Waste and Recovery Operations”. As of the “date issued” shown on page 1 of this permit, the affected off – site waste and recovery storage tanks are identified in Conditions 7.3.1 and 7.3.2 • The affected off – site waste and recovery storage tanks are subject to 35 IAC 218 Subpart G: Use of Organic Material • Each affected off – site waste and recovery storage tank is subject to the requirements of 35 IAC 218.122 (b) because each affected storage tank had a capacity greater than 946 liters (250 gallons).
Streamlining	N/A
Title I Conditions	The draft permit contains limits on operation and emissions in Conditions 7.3.5 and 7.3.6. These limits were incorporated from Permit 95120114.
Non-applicability	<ul style="list-style-type: none"> • The affected off – site waste and recovery storage tanks are not subject to 40 CFR 60 Subpart Kb (except for certain recordkeeping and reporting requirements of 40 CFR 60.116b), because of all of the storage tanks are either less than 75 m3 (approximately 19,813 gallon capacity) or less than 151 m3(approximately 39,890 gallon capacity) storing of a volatile organic liquid with a maximum true vapor pressure less than 27.6 kPa (approximately 4.00 psia), [40 CFR 60.110b and 60.112b].

Emission Unit – Tank Farms 4, 5, 6, 7, 8, 9, 14

<p>Non-applicability</p>	<ul style="list-style-type: none"> • The affected off-site waste and recovery storage tanks are not subject to 40 CFR Subpart Kb (except for certain recordkeeping and reporting requirements of 40 CFR 60.116B), because all of the storage tanks are either less than 75 m³ (approximately 19,813 gal) capacity or less than 151 m³ (approximately 39,890 gal) capacity storing a volatile organic liquid with a maximum true vapor pressure less than 27.6 kPa (approximately 4.00 psia). [40 CFR 60.110b and 60.112b] • The affected off – site waste and recovery storage tanks are not subject to 35 IAC 218 Subpart B, except for the 35 IAC 218.122 (b) and 218.129 (f), because the affected off – site waste and recovery storage tanks are less than 151 m (40,000 gallon capacity), [35 IAC 218.119]. • The affected off – site waste and recovery storage tanks are not subject to 35 IAC 218 Subpart TT, because storage tanks are exempt from control requirements, [35 IAC 218.980 (a)(2) and (b)(2)]. • The affected off – site waste and recovery storage tanks are not subject to the New Source Performance Standards (NSPS) for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 60, Subparts VV, III, NNN, and RRR; the National Emission Standards For Hazardous Air Pollutants for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 63, Subparts F, G, H and I; or the Organic Material Emissions Standards and Limitations for the Chicago Area, 35 IAC 218, Subparts Q and RR, because the affected off – site waste and recovery storage tanks are not associated with the manufacture of organic chemicals. • The affected off – site and recovery storage tanks are not subject to the National Emission Standards For Hazardous Air Pollutants for benzene 40 CFR 61, Subparts J, Y, BB, and FF, because affected off – site waste and recovery storage tanks are not operating in benzene service and the facility is not a benzene production facility, bulk terminal, chemical manufacturing plant, coke by – product recovery plant, or petroleum refinery. • The affected off – site waste and recovery storage tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary sources because the affected off – site waste and recovery storage tanks are subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).
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Periodic Monitoring (other than basic regulatory requirements)

<p>Testing</p>	<p>Testing Requirements are found in Section 7.3.7.</p>
<p>Emissions Monitoring</p>	<p>Emissions Monitoring is found in Section 7.3.8.</p>
<p>Operational Monitoring</p>	<p>Operational Monitoring is found in Section 7.3.11.</p>

Emission Unit – Tank Farms 4, 5, 6, 7, 8, 9, 14	
Inspections	Inspections Requirements are found in Section 7.3.8.
Recordkeeping	Recordkeeping Requirements are found in Section 7.3.9.
Other	Recordkeeping Requirements for control equipment is found in Section 7.3.8 (c) (ii).
Reporting	
Prompt Reporting	See attachment 3 in this project summary.
Other Reporting	Reporting Requirements are found in Section 7.3.10.

Table 4 (Section 7.4 of the draft permit)

Emission Unit – Tank Farms 1, 2, 3, 13	
Description	Storage tanks used to store recycled and reclaimed chemicals and solvents, solvent mixtures, aqueous chemicals and other organic materials. Condensers are used to minimize VOM emissions.
Date Constructed	Tank Farms 1,2,3: 1988 Tank Farm 13: 1990
Emission Control Equipment	Tank Farms 1,2: Condenser (C-6) Tank Farms 3: Condenser (C-18) Tank Farm 13: none
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • Each affected storage tank is subject to the requirements of 35 IAC 218.122(b) because each affected storage tank has a storage capacity greater than 946 liters (250 gallons). • The “affected storage tanks” for the purpose of these unit specific conditions, are units subject to 35 IAC 218 Subpart G. As of the “date issued” as shown on page 1 of this permit, the affected storage tanks are identified in Conditions 7.4.1 and 7.4.2.
Title I Conditions	The draft permit contains limits on operation and emissions in Conditions 7.1.5 and 7.1.6. These limits were incorporated from Permit 95120114.
Non-applicability	<ul style="list-style-type: none"> • The affected storage tanks are not subject to 40 CFR 63 Subpart DD “National Emissions Standards for off-site Waste and Recovery Operations” because the affected storage tanks do not receive off-site materials as defined in 40 CFR 63.680. • The affected storage tanks are not subject to 35 IAC 218 Subpart B, except for 35 IAC 218.122 (b) and 218.129 (f), because the affected storage tanks are less than 75 m³ (approximately 19,813 gallon capacity). [40 CFR 60.110 b] • The affected storage tanks are not subject to 35 IAC 218 Subpart B, except for 35 IAC 218.122 (b) and 218.129 (f) because the affected storage tanks are less than 151 m³ (approximately 40,000 gallon capacity). [35 IAC 218.119] • The affected storage tanks are not subject to 35 IAC 218 Subpart TT, because storage tanks are exempt from control requirements. [35 IAC 218.980 (a)(2) and (b)(2)]

Emission Unit – Tank Farms 1, 2, 3, 13

<p>Non-applicability</p>	<ul style="list-style-type: none"> • The affected storage tanks are not subject to the New Source Performance Standards (NSPS) for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 60, Subparts VV, III, NNN and RRR; the National Emission Standards For Hazardous Air Pollutants for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 63, Subparts F, G, H and I; or the Organic Material Emission Standards and Limitations for the Chicago Area, 35 IAC 218, Subparts Q and RR, because the affected storage tanks are not associated with the manufacture of organic chemicals. • The affected storage tanks are not subject to the National Emission Standards For Hazardous Air Pollutants for benzene, 40 CFR 61 Subparts J, Y, BB and FF, because affected storage tanks are not operating in benzene service and the facility is not a benzene production facility, bulk terminal, chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery.
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Periodic Monitoring (other than basic regulatory requirements)

<p>Testing</p>	<p>Testing Requirements are not set for the affected storage tanks. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.</p>
<p>Emissions Monitoring</p>	<p>Monitoring Requirements are not set for the affected storage tanks. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.</p>
<p>Operational Monitoring</p>	<p>N/A</p>
<p>Inspections</p>	<p>N/A</p>
<p>Recordkeeping</p>	<p>Recordkeeping Requirements can be found in Section 7.4.9</p>

Reporting

	<p>Reporting Requirements can be found in Section 7.4.10</p>
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Table 5 (Section 7.5 of the draft permit)

Emission Unit – Natural Gas Fired Boilers, B-1, B-2	
Description	Boilers used to generate plant steam. The steam is used for heating water, freeze protection, comfort control and in process equipment such as evaporators and distillation units.
Date Constructed	Boiler #1, B-1: 1992 Boiler #2, B-2: 1988
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • An affected boiler for the purpose of these unit specific conditions is a steam generating unit that is fired with natural gas, with a maximum heat input capacity of 100 mmBtu/hr or less, but greater than or equal to 10 mmBtu/hr. • As of the “date issued” as shown on page 1 of this permit, the affected boilers are identified in Conditions 7.5.1 and 7.5.2. and are subject to emission limits identified in Section 5.2.2. • Boiler #1 is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Subpart Dc because the boiler was constructed after June 9, 1989 and the firing rate of the boiler is less than 100 mmBtu/hr and greater than 10mmBtu/hr. • The affected boilers are subject to 35 IAC Part 216, Subpart B, which states that, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 10 mmBtu/hr.
Streamlining	N/A
Title I Conditions	The draft permit contains limits on operation and emissions in Conditions 7.5.6. These limits were incorporated from Permit 92080095 and 95120114.
Non-applicability	<ul style="list-style-type: none"> • The affected boilers are not subject to 35 IAC 217.141 because the actual heat input of each affected boiler is less than 73.2 MW (250 mmBtu/hr). • The affected boilers are not subject to 40 CFR 60 Subpart Db, because the boilers each have maximum heat input capacity of less than 100 mmBtu/hr. • The affected boilers are not subject to 35 IAC 218 Subpart G, because fuel combustion emission units are exempt pursuant to 35 IAC 218.303.

Emission Unit – Natural Gas Fired Boilers, B-1, B-2	
Non-applicability	<ul style="list-style-type: none"> • The affected boilers are not subject to 35 IAC 218 Subpart TT, because fuel combustion emission units are exempt from control requirements pursuant to 35 IAC 218.980 (f). • The affected boilers are not subject to the emission limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of 40 CFR Part 63, Subpart DDDD, NESHAP for Industrial, commercial, and Institutional Boilers and Process Heaters, because the affected boilers are existing, large gaseous fuel units [40 CFR 63.7506 (b)]. • The affected boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for major Stationary Sources, because the affected boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Testing requirements are not set for the affected boilers. However, there are source wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.
Emissions Monitoring	See Section 7.5.6 and 7.5.12 regarding compliance with Emissions Limitations.
Operational Monitoring	N/A
Inspections	N/A
Recordkeeping	See Section 7.5.9 for recordkeeping requirements
Reporting	
Prompt Reporting	Reporting Requirements can be found in Section 7.5.10.

Table 6 (Section 7.6 of the draft permit)

Emission Unit – Pumps, Valves, Open-ended Lines, Connectors/Flanges, Relief Valves	
Description	Pumps, valves, open–end lines, connectors/flanges and relief valves used to recycle and reclaim a variety of used chemicals and solvents, solvent mixtures, solid and semi-solid materials, aqueous chemicals and other organic wastes.
Date Constructed	N/A
Emission Control Equipment	Inspection and Monitoring Program
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • The “affected leaking equipment” for the purpose of these unit specific conditions, are the units that are subject to 40 CFR 63 Subpart DD “National Emission Standards for Off-site Waste and Recovery Operations”. For the purposes of this permit all leaking equipment at the site, regardless of whether they are engaged in off-site waste and recovery operations, will be subject to 40 CFR Subpart DD. As of the “date issued” as shown on page 1 of this permit, the affected off-site waste and recovery operations are identified in Conditions 7.6.1 and 7.6.2. • The affected leaking equipment is subject to 35 IAC 218 Subparts C and TT. • The affected leaking equipment is subject to 40 CFR 63 Subpart DD. To streamline the applicable requirements for the source, the Illinois EPA finds that compliance with 40 CFR 63, Subpart DD assures compliance with 35 IAC 218 Subparts C and TT.
Title I Conditions	The draft permit contains limits on operation and emissions in Conditions 7.1.5 and 7.1.6. These limits were incorporated from Permit 99050016.
Non-applicability	<ul style="list-style-type: none"> • The “affected leaking equipment” is not subject to the New Source Performance Standards (NSPS) for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 60 Subparts VV, III NNN and RRR; the National Emissions Standards For Hazardous Air Pollutants for the Synthetic Organic Chemicals Manufacturing Industry, 40 CFR 63, Subparts F,G,H and I; or the Organic Material Emission Standards and Limitations for the Chicago Area, 35 IAC 218,Subparts Q and RR, because the affected leaking equipment is not associated with the manufacture of organic chemicals.

Emission Unit – Pumps, Valves, Open-ended Lines, Connectors/Flanges, Relief Valves	
Non-applicability	<ul style="list-style-type: none"> • The affected leaking equipment is not subject to the National Emission Standards For Hazardous Air Pollutants for benzene, 40 CFR 61, Subparts J,Y, BB and FF because affected leaking equipment is not operating in benzene service and the facility is not a benzene production facility, bulk terminal, chemical manufacturing plant, coke by-product recovery [plant, or petroleum refinery. • The affected leaking equipment is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected leaking equipment does not use an add-on control device to achieve compliance with an emission limitation or standard and is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2 (b)(1)(i).
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Testing Requirements can be found in Section 7.6.7.
Emissions Monitoring	Emissions Monitoring procedures can be found in Section 7.6.12.
Operational Monitoring	Monitoring requirements can be found in Section 7.6.5 and 7.6.8.
Inspections	Inspection procedures can be found in Section 7.6.5.
Recordkeeping	Recordkeeping Requirements can be found in Section 7.6.9.
Reporting	
Prompt Reporting	Reporting requirements can be found in Section 7.6.10.

Table 7 (Section 7.7 of the draft permit)

Emission Unit – Gasoline Storage Tank	
Description	Tank #246 is a 560 gallon above ground fixed roof tank for the storage of gasoline for use in various plant vehicles.
Date Constructed	2005
Emission Control Equipment	Submerged Loading
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • Gasoline Tank T-246 is an “affected tank” for the purpose of these unit specific conditions. • No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, or unless such tank is a pressure tank as described in 35 IAC 218.121 (a) or is fitted with a recovery system as described in 35 IAC 218.121 (b)(2). [35 IAC 218.122(b)] • No person shall allow or cause the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303 or 218.304 and the following exemption: If no odor nuisance exists, the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material. [35 IAC 218.301] • Pursuant to 35 IAC 218.583 (a), no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing operation unless the tank is equipped with a submerged loading pipe. [35 IAC 218.583(a)(1)]
Title I Conditions	The affected tank shall only be used for the storage of gasoline. This was established in Permit 0507006.

Emission Unit – Gasoline Storage Tank	
Non-applicability	<ul style="list-style-type: none"> • The affected tank is not subject to the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which construction, reconstruction or modification commenced after July 23, 1984, 40 CFR 60 Subpart Kb, because the affected tank has a storage capacity less than 75 m³ (approximately 19,813 gallons) • The affected tank is not subject to the requirements of 35 IAC 218.123, Petroleum Liquid Storage Tanks, pursuant to 35 IAC 218.123(a)(2), which exempts storage tanks with a capacity less than 151.42 m³ (approximately 40,000 gallons). • The affected tank is not subject to 35 IAC 218.583(a)(2) and (3) because the tank's capacity is less than 575 gallons.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Testing requirements are not set for the affected tank. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.
Emissions Monitoring	This permit is issued based on negligible emissions of VOM from the gas tank. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hr and 0.44 ton/yr. Conditions 5.3.2 and 5.6 apply. See Section 7.7.12 for compliance procedures.
Operational Monitoring	Operational flexibility is not set for the affected tank.
Inspections	N/A
Recordkeeping	Recordkeeping requirements can be found in Section 7.7.9.
Reporting	
Prompt Reporting	Reporting requirements can be found in Section 7.7.10.

ATTACHMENT 3: Prompt Reporting of Deviations

Prompt reporting of deviations is critical in order to have timely notice of deviations and the opportunity to respond, if necessary. The effectiveness of the permit depends upon, among other important elements, timely and accurate reporting. The Illinois EPA, USEPA and the public rely on timely and accurate reports submitted by the Permittee to measure compliance and to direct investigation and follow-up activities. Prompt reporting is evidence of a Permittee's good faith in disclosing deviations and describing the steps taken to return to compliance and prevent similar incidents.

Any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in this CAAPP permit is a deviation subject to prompt reporting. Additionally, any failure to comply with any permit term or condition is a deviation of that permit term or condition and must be reported to the Illinois EPA as a permit deviation. The deviation may or may not be a violation of an emission limitation or standard. A permit deviation can exist even though other indicators of compliance suggest that no emissions violation or exceedance has occurred. Reporting permit deviations does not necessarily result in enforcement action. The Illinois EPA has the discretion to take enforcement action for permit deviations that may or may not constitute an emission limitation or standard or the like, as necessary and appropriate.

Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(B), requires prompt reporting of deviations from the permit requirements. The permitting authority (in this case, Illinois EPA) has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur. Furthermore, Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(A) requires that monitoring reports must be submitted at least every 6 months. Therefore, USEPA generally considers anything less than 6 months to be "prompt" as long as the selected time frame is justified appropriately (60 Fed. Reg. 36083, 36086 (July 13, 1995)).

The USEPA has stated that, for purposes of administrative efficiency and clarity, it is acceptable to define prompt in each individual permit. *Id.* The Illinois EPA has elected to follow this approach and defines prompt reporting on a permit by permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, this frequency or a shorter frequency of reporting is the required timeframe used in this permit. Where the underlying applicable requirement fails to explicitly set forth the timeframe for reporting deviations, the Illinois EPA has developed a structured manner to determine the reporting approach used in this permit.

The Illinois EPA generally uses a time frame of 30 days to define prompt reporting of most deviations. Also, for certain permit conditions in individual permits, the Illinois EPA may require an alternate timeframe that is less than 30 days if the permit requirement justifies a shorter reporting time period. Under certain circumstances, EPA may establish a deviation reporting period longer than 30 days, but, in no event exceeding 6 months. Where it has established a deviation reporting period other than 30 days in an individual permit (specifically Section 7.x.10), the Illinois EPA has explained the reason for the alternative timeframe. (See Attachment 2 of this Project Summary.)

The timing for certain deviation reporting may be different when a source or emission unit at a source warrants reporting to address operation, independent of the occurrence of any deviations. This is the case for a source that is required to perform continuous monitoring for the emission unit, for which quarterly or semi-annual “monitoring” reports are appropriate. Where appropriate, reporting of deviations has generally been combined in, or coordinated with these quarterly or semi-annual reports, so that the overall performance of the plant can be reviewed in a comprehensive fashion. This will allow a more effective and efficient review of the overall performance of the source by the Illinois EPA and other interested parties, as well as by the source itself.

At the same time, there are certain deviations for which quicker reporting is appropriate. These are deviations for which individual attention or concern may be warranted by the Illinois EPA, USEPA, and other interested parties. Under this scenario, emphasis has been placed primarily on deviations that could represent substantial violations of applicable emission standards or lapses in control measures at the source. For these purposes, depending on the deviation, immediate notification may be required and preceded by a follow-up report submitted within 15 days, during which time the source may further assess the deviation and prepare its detailed plan of corrective action.

In determining the timeframe for prompt reporting, the Illinois EPA assesses a variety of criteria such as:

- historical ability to remain in continued compliance,
- level of public interest in a specific pollutant and/or source,
- seriousness of the deviation and potential to cause harm,
- importance of applicable requirement to achieving environmental goals,
- designation of the area (i.e., non-attainment or attainment),
- consistency among industry type and category,
- frequency of required continuous monitoring reports (i.e., quarterly),
- type of monitoring (inspection, emissions, operational, etc.), and
- air pollution control device type and operation

These prompt reporting decisions reflect the Illinois EPA’s consideration of the possible nature of deviations by different emission units and the responses that might be required or taken for those different types of deviations. As a consequence, the conditions for different emission units may identify types of deviations which include but are not limited to: 1) Immediate (or very quick) notification; 2) Notification within 30 days as the standard; or 3) Notification with regular quarterly or semi-annual monitoring reports.

The Illinois EPA’s decision to use the above stated prompt reporting approach for deviations as it pertains to establishing a shorter timeframe in certain circumstances reflects the criteria discussed as well as USEPA guidance on the topic.

- 40 CFR 71.6(a)(3)(iii)(B) specifies that certain potentially serious deviations must be reported within 24 or 48 hours, but provides for semi-annual reporting of other deviations. (Serious or severe consequences)

- FR Vol. 60, No. 134, July 13, 1995, pg. 36086 states that prompt should generally be defined as requiring reporting within two to ten days of the deviation, but longer time periods may be acceptable for a source with a low level of excess emissions. (intermediate consequences)
- Policy Statement typically referred to as the “Audit Policy” published by the USEPA defines prompt disclosure to be within 21 days of discovery. (Standard for most “pollutant limiting” related conditions)
- Responses to various States by USEPA regarding other States’ definition of prompt.

As a result, the Illinois EPA’s approach to prompt reporting for deviations as discussed herein is consistent with the requirements of 39.5(7)(f)(ii) of the Act as well as 40 CFR Part 70 and the CAA. This reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant individual attention. The timing for these event-specific notifications is necessary and appropriate as it gives the source enough time to conduct a thorough investigation into the causes of an event, collecting any necessary data, and to develop preventative measures, to reduce the likelihood of similar events, all of which must be addressed in the notification for the deviation.

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