

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Equilon Enterprises LLC
Attn: Greg Hermsen
8600 West 71st Street
Bedford Park, Illinois 60501

<u>Application No.:</u> 95110085	<u>I.D. No.:</u> 031012AAQ
<u>Applicant's Designation:</u>	<u>Date Received:</u> November 27, 1995
<u>Operation of:</u> Petroleum Bulk Terminal	
<u>Date Issued:</u> May 23, 2000	<u>Expiration Date:</u> May 23, 2005
<u>Source Location:</u> 8600 West 71st Street, Bedford Park, Cook County	
<u>Responsible Official:</u> T.J. Rizzoli, Regional Manager	

This permit is hereby granted to the above-designated Permittee to operate a petroleum bulk terminal, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Mike Davidson at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:MED:psj

cc: Illinois EPA, FOS, Region 1
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Equilon Enterprises LLC
8600 West 71st Street
Bedford Park, Illinois 60501
708/563-6312

I.D. No.: 031012AAQ
Standard Industrial Classification: 5171, Petroleum Bulk Stations
and Terminals

1.2 Owner/Parent Company

Equilon Enterprises LLC
P.O. Box 4453
Houston, Texas 77210-4453

1.3 Operator

Equilon Enterprises LLC
P.O. Box 4453
Houston, Texas 77210-4453

Greg Hermsen
708/563-6312

1.4 General Source Description

Equilon Enterprises LLC is located at 8600 West 71st Street in Bedford Park. The source is a petroleum bulk terminal for various petroleum products. Materials are transferred to the terminal by pipe line, tank truck or railcar where they may be temporarily stored prior to shipment of the material to different destinations via tank truck. A truck loading rack is used for this purpose.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATUs	Allotment Trading Units
BAT	Best Available Technology
bbl	Barrel
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
Cu in	cubic inch
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic foot
gal	Gallon
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IFR	Internal Floating Roof
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kg	kilogram
kg/hr	kilogram per hour
kPa	kiloPascals
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
lb/gal	pound per gallon
m	meter
m ³	cubic meters
MACT	Maximum Achievable Control Technology
mg	Milligram
mm	Millimeter
mmBtu	Million British thermal units
mmBtu/hr	Million Btus per hour
ml	milliliter
mo	Month
MSDS	Material Safety Data Sheet
NESHAP	National Emission Standards for Hazardous Air Pollutants

NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
OL	Organic Liquid
OM	Organic Material
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psi	Pounds per square inch
psia	Pounds per square inch absolute
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TANKS	USEPA Emission Estimating Program for Storage Tanks
TOC	Total Organic Compounds
tpy	ton per year
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
VRU	Vapor Recovery Unit
wt.	Weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

An oil/water separator having VOM emissions of less than 1.0 lb/hr and individual HAP emissions of less than 0.1 lb/hr

In-line gasoline filter pots

Small portable meter calibration tank

Interface/Transmix gasoline additive storage tanks A-91, A-92, A-93, A-94, A-95, A-96 and A-97

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

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

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

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

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

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

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Emission Control Equipment
Group 1 Storage Tanks (See Attachment 1 for details)	Fixed roof storage tanks with a capacity greater than 40,000 gallons	Permanent submerged fill
Group 2 Storage Tanks (See Attachment 1 for details)	Internal floating roof storage tanks - Not Subject to 40 CFR 60 Subpart Kb	Floating roof, either vapor - mounted resilient or mechanical shoe-mounted primary seal, either no secondary seal or a rim-mounted secondary seal, and a permanent submerged loading pipe
Group 3 Storage Tanks (See Attachment 1 for details)	Internal floating roof storage tanks - Subject to 40 CFR 60 Subpart Kb	Floating roof, , vapor - mounted resilient primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
Group 4 Tank truck loading rack	Four bay petroleum product truck loading rack	Vapor Recovery Unit
Fugitive emissions	Piping, valves, and pumps used to transfer materials between the pipe line storage tanks and loading/unloading rack	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
 - c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.
- 5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 5.2.4 Pursuant to 35 IAC 218.585(a), (b), and (c), during the regulatory control periods of May 1 to September 15 of each year, no person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline, that has a Reid vapor pressure in excess of the following:
- a. Gasoline shall not exceed 9.0 psi (62.07 kPa); and
 - b. Ethanol blend gasoline's shall not exceed the limitations of (a) above by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline.
- 5.2.5 Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:
- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
 - b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.
- 5.2.6 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the

applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.3 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the source not being subject to 40 CFR 63, Subpart R because the source is not a major source of HAPs. [40 CFR Section 63.420(b)(2)] (See also Condition 5.5)
- b. This permit is issued based on the source not being subject to 40 CFR 61, Subpart J because the pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source are not in benzene service as defined in 40 CFR 61.111. (See also Condition 5.4)
- c. This permit is issued based on the source not being subject to 40 CFR 61, Subpart V because pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels at the source are not in volatile hazardous air pollutant service as defined in 40 CFR 61.241. (See also Condition 5.4)
- d. This permit is issued based on the source not being subject to 40 CFR 63, Subpart R, Y, and OO because the aggregate actual HAP emissions from the source is less than 10 tons of each individual HAP and 25 tons for all HAPs. (See also Condition 5.5.)
- e. This permit is issued based on the source not being subject to 40 CFR 68, because the materials stored at the source are fuels that are in distribution for use as fuel for internal combustion engines.

5.4 Source-Wide Operational and Production Limits and Work Practices

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

- a. The pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source shall not be used to process, store, unload or load any of the following:
 - i. A VOL containing vinyl chloride or benzene in excess of 10 percent by weight.

These limits are being established, pursuant to a request by the Permittee, in order to demonstrate the non-applicability of the rules referenced in Condition 5.3.

- b. The Permittee shall inspect pumps and compressors for leaks on at least a monthly basis. If a significant leak is detected by any means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs within 15 days.
- c. During the regulatory control period, May 1 through September 15 of each year, the Permittee shall state that the Reid vapor pressure of all gasoline or ethanol blends leaving the source for use in Illinois complies with the Reid vapor limitations of Condition 5.2.3. Any operation receiving this gasoline shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 218.585(b) and (c) (Condition 5.2.3).

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	273.21
Sulfur Dioxide (SO ₂)	--
Particulate Matter (PM)	--
Nitrogen Oxides (NO _x)	--
HAP, not included in VOM or PM	--
TOTAL	273.21

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with

Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

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

5.6.2 General Records for Storage Tanks

- a. Pursuant to Condition 5.8, the Permittee shall maintain a log identifying which unit-specific condition (Condition 7.1, 7.2, and 7.3) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.
 - b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m³ (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.
 - i. The date* on which construction of the tank was commenced, with a copy of supporting documentation;
 - ii. The date(s)* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, were commenced on the tank, if applicable;
 - iii. A list of the types of VOL actually stored in the tank and anticipated to be stored in the tank, with date of each change in the list; and
 - iv. The dimensions of the tank and an analysis of capacity. [35 IAC 218.129(f) and 40 CFR 60.116b(b)]
- * If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

5.6.3 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the storage tanks at the source so as to demonstrate compliance with the annual emission limits in Condition 5.5. These records shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

- a. The color of each storage tank;
- b. The condition of each storage tank; and
- c. The type and number of fittings.

5.6.4 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to allow verification that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63 Subpart R and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5:

- a. The Permittee shall maintain the following general records:
 - i. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;
 - ii. The vapor weight percent of each HAP in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey;
 - iii. A copy of the supporting documentation for HAP vapor weight percent; and
 - iv. A current analysis of the tank or tanks in each group that would have the greatest emissions from storage of various liquids in the event that the Permittee does not choose to keep throughput records by individual tank,

to identify the tank that should be assumed for emission calculations.

- b. The Permittee shall maintain records of the following items:
 - i. Monthly throughputs of each organic liquid through each tank or group of tanks;
 - ii. The annual source wide throughputs calculated by totaling the applicable throughputs for each specific organic liquid for the previous 12 months, with supporting calculations.
 - iii. Total annual emissions of VOM and HAP from the source calculated by totaling the applicable emissions for the previous 12 months, tons/year, with supporting calculations.

5.6.5 Records for Operating Scenarios

If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F as provided for in Condition 5.8, the Permittee shall maintain a log identifying the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.

5.6.6 Records for Pump and Compressor Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4.

- a. The performance of an inspection or other observation identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;
- b. The condition, i.e., idle or operation, of each pump or compressor inspected;
- c. The presence of a leak, with description and the means of identification;
- d. The date the leak was repaired, or the component taken out of service; and

- e. If a corrective action, as in Condition 5.4, was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

5.6.7 Records for Gasoline Volatility

Pursuant to 35 IAC 218.585(h)(2), the Permittee shall maintain records of the following items for gasoline and ethanol blends leaving the source for use in Illinois:

- a. Reid vapor pressure of each gasoline or ethanol blend shipment;
- b. Quantity of each gasoline or ethanol blend shipment; and
- c. Date of delivery of each shipment.

5.6.8 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1 and 5.5.2.

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

- a. The Permittee is authorized to store materials with a vapor pressure less than 0.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any storage tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.0 of this permit applicable to such tank based on the storage of VPL shall no longer apply. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of an emission unit, as defined in 35 IAC 201.102.
- b. Upon resuming storage of VPL in such a tank, the applicable unit-specific conditions of Section 7.0 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct applicable inspection of the tank for storage of VPL.

5.9 General Compliance Procedures

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

- a. Available data on the storage temperature may be used to determine the maximum true vapor pressure (See Condition 7). [35 IAC 218.128(b)]
 - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
 - ii. For other liquids, the vapor pressure shall be:

- A. Determined by ASTM Method D2879-83, incorporated by reference at Section 218.112(a)(1) of this Part;
 - B. Measured by an appropriate method approved by the Illinois EPA and USEPA; or
 - C. Calculated by an appropriate method approved by the Illinois EPA and USEPA.
- b. For the purpose of estimating VOM emissions from the storage tanks, the most current version of the TANKS program is acceptable.
 - c. For the purpose of estimating fugitive VOM emissions from components at the source, the emission factors found in "Protocol for Equipment Leak Emission Estimates" (EPA453/R-95-017), 1995 published by USEPA or the best available emission factors, including factors developed by the source, are acceptable.
 - d. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable.
 - e. Total VOM and HAP emissions at the source shall be determined as the sum of the respective VOM and HAP emissions from the tanks (Conditions 7.1 through 7.3), the loading rack (Condition 7.4) and fugitives (Condition 7.5).

5.10 Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 218.142 as Condition 5.4 establishes appropriate compliance procedures for this rule that do not rely on such measurements.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the

associated emergency conditions report that has been approved by the Illinois EPA;

- v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 249 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 28.1983 tons per season.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period during issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period during the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Group 1 Storage Tanks
Fixed roof storage tanks with a capacity greater than 40,000 gallons that store organic material with a vapor pressure less than 0.5 psia

7.1.1 Descriptions

The Permittee operates a fixed roof storage tank to store low vapor pressure organic materials. Permanent submerged loading is used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.1.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
A-14	Fixed roof tank	Permanent submerged loading pipe
A-70	Fixed roof tank	Permanent submerged loading pipe
A-80	Fixed roof tank	Permanent submerged loading pipe

7.1.3 Applicability Provisions

An "affected tank" for the purpose of these unit-specific conditions, is a fixed roof storage tanks with a capacity greater than 40,000 gallons that is used to store organic liquid with a maximum true vapor pressure of less than 0.5 psia.

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.1.2. The status of all storage tanks at this source, including affected tanks, is summarized in Attachment 1.

7.1.4 Non-Applicable Regulations

- a. An affected tank is not subject to the requirements of 40 CFR 60 Subparts K, Ka or Kb, because the tank was constructed prior to the applicability dates of the NSPS for Storage Vessels for Petroleum Liquids. . [40 CFR 60.110(a), 60.110a(a), and 60.110b(a)]
- b. An affected tank is not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, because the vapor pressure of VOLs stored in the tank is less than 0.5 psia (See Condition 7.1.7). [35 IAC 218.119(a)]
- d. An affected tank is not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, because the petroleum liquid stored in the tank does meet the

definition for volatile petroleum liquid. [35 IAC 211.7170]

- e. An affected tank is not subject to the requirements of 35 IAC 218.122, Loading Operations, if no odor nuisance exists the limitations of 35 IAC 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). [35 IAC 218.122(c)]
- f. An affected tank is not subject to the requirements of 35 IAC 218.123, Petroleum Liquid Storage Tanks, because the petroleum liquid stored in the tank does meet the definition for volatile petroleum liquid. [35 IAC 218.123(a)(6)]
- g. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]

7.1.5 Control Requirements

N/A

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected storage tanks are subject to the following:

N/A

7.1.7 Operating Requirements

Pursuant to Section 39.5(7)(a) of the Act and 35 IAC 218.119(a) the Permittee shall not store any organic material with a true vapor pressure of 0.5 psia or greater.

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.1.7 pursuant to Section 39.5(7)(b) of the Act:

The storage of any organic liquid with a true vapor pressure greater than 0.5 psia.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Any storage of organic liquid with a true vapor pressure greater than 0.5 psia in an affected tank within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.

7.1.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.2 Group 2 Storage Tanks

Internal floating roof storage tanks - Not Subject to 40 CFR 60 Subpart Kb

7.2.1 Description

The Permittee operates internal floating roof storage tanks to store various petroleum products and organic liquids. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
A-09	Internal floating roof tank	Floating roof, vapor - mounted resilient primary seal and a permanent submerged loading pipe
A-10	Internal floating roof tank	Floating roof, mechanical shoe primary seal, rim-mounted secondary seal and a permanent submerged loading pipe
A-11	Internal floating roof tank	Floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe
A-12	Internal floating roof tank	Floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe
A-30	Internal floating roof tank	Floating roof, mechanical shoe primary seal, and a permanent submerged loading pipe

7.2.3 Applicability Provisions

An "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 218.120(a), 218.121, 218.122(b), and 218.123 that relies upon a permanent submerged loading pipe and internal floating roof for compliance. A storage tank is subject to the control requirements as follows:

- a. An affected storage tank is subject to the control requirements of 35 IAC 218.120(a) if it has a capacity greater than or equal to 40,000 gallons (151 m³) storing a VOL with a vapor pressure of 5.19 kPa (0.75 psia) or more but less than or equal to a

maximum true vapor pressure of 76.52 kPa (11.1 psia).
(Internal floating roof - 35 IAC 218.120(a)(1))

- b. An affected storage tank is subject to the control requirements of 35 IAC 218.121 if it has a capacity greater than or equal to 40,000 gallons (151 m³) storing a VPL with a vapor pressure of 10.34 kPa (1.5 psia) or greater at 294.3 °K (70 °F). (Internal floating roof - 35 IAC 218.121(b)(1))
- c. Unless exempted pursuant to 35 IAC 218.122(c), an affected storage tank is subject to the control requirements of 35 IAC 218.122 with a storage capacity of greater than 250 gal is required to be equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA. The Illinois EPA has not approved any alternative control. (Submerged Loading Pipe - 35 IAC 218.122(b))
- d. Unless exempted pursuant to 35 IAC 218.123(a), an affected storage tank that stores volatile petroleum liquid is subject to the control requirements of 35 IAC 218.123(b). (Submerged Loading Pipe - 35 IAC 218.123(b))

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.2.2. The status of all storage tanks at this source, including affected tanks is summarized in Attachment 1.

7.2.4 Non-Applicable Regulations

- a. Each affected storage tank is not subject to the requirements of 40 CFR 60 Subpart K, Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.
- b. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]

7.2.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. An internal floating roof that shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be

floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [35 IAC 218.120(a)(1)(A) and 218.121(b)(1)]

- b. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)]
- c. i. Each internal floating roof, used to store VOLs (See Condition 7.2.7), shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof [35 IAC 218.120(a)(1)(B)]:
 - A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank;
 - B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous; or
 - C. A mechanical shoe seal, which 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.
- ii. Each affected internal floating roof, used to store only petroleum liquids (See Condition 7.2.7), shall be equipped with a closure seal or seals between the roof edge and the tank wall. [35 IAC 218.121(b)(1)]

- d. 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. [35 IAC 218.120(a)(1)(C)]
- e. 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. [35 IAC 218.120(a)(1)(D) and 218.123(b)(3)(A)]
- f. 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. [35 IAC 218.120(a)(1)(E) and 218.123(b)(3)(B)]
- g. 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. [35 IAC 218.120(a)(1)(F) and 218.123(b)(3)(C)]
- h.
 - i. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 218.121 (b)(1)].
 - ii. 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. [35 IAC 218.120(a)(1)(G)]
- i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [35 IAC 218.120(a)(1)(H)] and
- j. A permanent submerged loading pipe. [35 IAC 218.122(b)]

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected storage tanks are subject to the following:

N/A

7.2.7 Operating Requirements

The affected storage tanks are allowed to store only the organic materials as classified below:

Storage Tank	Petroleum Liquids	VOL
A-09	X	--
A-10	X	X
A-11	X	X
A-12	X	X
A-30	X	--

VOLs is defined as organic liquids which meet the definition of VOL under 35 IAC 211.7110, but which do not meet the definition of petroleum liquid defined in 35 IAC 211.4610.

7.2.8 Inspection and Monitoring Requirements

- a. For each affected storage tank, used to store petroleum liquids (See Condition 7.2.7), the Permittee shall verify compliance with the applicable control and operating requirements of 35 IAC 218.123 by visually inspecting the applicable storage tank's floating roof seals of each affected tank semiannually. [35 IAC 218.123(b)(4)].
- b. For each affected storage tank, used to store petroleum liquids (See Condition 7.2.7), the Permittee shall verify compliance with the applicable control and operating requirements of 35 IAC 218.123 by visually inspecting the applicable storage tank's cover and seals whenever the tank is emptied for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b)(5)].
- c. For each affected storage tank, used to store VOLs (See Condition 7.2.7), the Permittee shall verify compliance with the requirements of 35 IAC

218.120(a)(1) by visually inspecting the applicable storage tank as follows:

- i. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the Permittee shall 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. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if 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 is detected during the required inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the owner or operator may request a 30-day extension from the Illinois EPA in the inspection report required in Condition 7.2.10. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the owner or operator will take that will assure that the control equipment will be repaired or the vessel will be emptied within 60 days. [35 IAC 218.127(a)(2)]
- ii. For vessels equipped with both primary and secondary seals, the Permittee shall visually inspect the affected storage tanks as follows: [218.127(a)(3)]
 - A. In accordance with the requirements of 7.2.8(c)(iii) below at least every 5 years; or
 - B. In accordance with the requirements of 7.2.8(c)(i) above at least once every 12 months.
- iii. The Permittee shall 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 if the seal fabric or the secondary seal has holes, tears, or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if 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 above exists 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 Condition 7.2.8(c)(i) and 7.2.8(c)(ii)(B) above and at intervals no greater than 5 years in the case of vessels specified in Condition 7.2.8(c)(ii)(A) above. [35 IAC 218.127(a)(4)]

- d. Compliance with the inspection requirements of Condition 7.2.8(c) is deemed more stringent than the requirements in 7.2.8(a) and (b). Therefore, the inspections required by Condition 7.2.8(c) shall supercede the inspections required under 7.2.8(a) and (b).

7.2.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank: [35 IAC 218.123(b)(6) and 218.129]
 - i. A list of the types of volatile petroleum liquid stored on a monthly basis;
 - ii. The maximum true vapor pressure of each type of liquid as stored, psia; and
 - iii. The results of any inspections or measurements required by the Condition 7.2.8, including:
 - A. Type of inspection;
 - B. When the inspection and/or measurement was performed;
 - C. Who performed the inspection and/or measurement;

- D. The method of inspection and/or measurement;
 - E. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
 - F. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.2.8(b) (Cover and Seal Inspection) [35 IAC 218.123(b)(6) and 218.129]:

Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify in writing at least 30 days prior to the filling or refilling of each affected storage tank for which an inspection is required by Condition 7.2.8(c) above to afford the Illinois EPA the opportunity to have an observer present. If the inspection, required by Condition 7.2.8(c)(iii) above, is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Illinois EPA 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 at least 7 days prior to the refilling. [35 IAC 218.127(a)(5)]
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control, operating, or inspection requirements, as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- i. Any storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.2.5, e.g., "no permanent submerged loading pipe," within 5 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
- ii. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.2.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
- iii. Any storage of VOLs other than those specified in Condition 7.2.7.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.
- b. Changes in seal type and configuration, made during the course of normal repair and maintenance of an affected storage tank's floating roof, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.
- c. Changes accounted for in Condition 5.8.

7.2.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.3 Group 3 Storage Tanks
 Internal floating roof storage tanks - Subject to 40 CFR 60
 Subpart Kb

7.3.1 Description

The Permittee operates a new internal floating roof storage tank(s) to store various petroleum products and VOLs. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
A-44	New internal floating roof tank	Floating roof, vapor - mounted resilient primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe

7.3.3 Applicability Provisions

- a. An "affected tank," for the purposes of these unit specific conditions is a storage tank that is subject to the control requirement of 40 CFR 60 Subpart Kb and 35 IAC 218.122(b) that relies on an internal floating roof and a permanent submerged loading pipe for compliance, respectively. A storage tank constructed, reconstructed, or modified after July 23, 1984 is subject to the control requirements of 40 CFR 60 Subpart Kb if it a design capacity greater than or equal to 151 m³ (approx. 39,890 gal) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa (0.754 psia) but less than 76.6 kPa (11.1 psia) or with a design capacity greater than or equal to 75 m³ (19,813 gal) but less than 151 m³ (39,890 gal) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa (4.00 psia) but less than 76.6 kPa (11.1 psia).

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.3.2. The status of all storage tanks at this source, including affected tanks that are subject to 40 CFR 60 Subpart Kb, is summarized in Attachment 1

- b. Each storage tank subject to 40 CFR 60 Subpart Kb is hereby shielded from compliance with 35 IAC 218.120,

218.121, and 218.123. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR 60, Subpart Kb assures compliance with 35 IAC 218.120, 218.121, and 218.123, following the review requirements of 40 CFR 60 Subpart Kb and 35 IAC 218.120, 218.121, and 218.123.

7.3.4 Non-Applicable Regulations

N/A

7.3.5 Control Requirements

- a. Each affected tank shall comply with the requirements of 40 CFR 60.112b(a)(1)(i), which requires the use of a fixed roof in combination with an internal floating roof that is equipped with one of the following closure devices:
 - i. a foam-filled or liquid-filled liquid-mounted seal; or
 - ii. two continuous seals; or
 - iii. a mechanical shoe seal
- b. Each affected tank shall also be equipped with a permanent submerged loading pipe. [35 IAC 218.122(b)]

7.3.6 Emission Limitations

- a. In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected emission units, Storage Tank A-44, are subject to the following:

Emissions from the affected Storage Tank A-44 shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.64	6.35

These limits are based on the operational limits referenced in Condition 7.3.7(b) and the compliance procedures referenced in Condition 7.3.12.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the

current month plus the preceding 11 months (running 12 month total).

The above limitations contain revisions to previously issued Permit 94100026. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the previous emissions limitations on Storage Tank A-44, as established in Permit 94100026, i.e., the previous limit of 0.5 ton/year, has been revised based upon the latest USEPA calculation procedures (TANKS program) and the maximum VOL throughputs indicated in the CAAPP application. [T1R].

- b. There are also source wide limitations in Condition 5.5 that include this unit.

7.3.7 Operating Requirements

- a. Each affected tank shall be operated in compliance with the operating requirements of 40 CFR 60.112b(a)(1) and 60.113b(a), as follows:
 - i. The internal floating roof shall float on the liquid surface at all times, except during those intervals when the storage tank is being completely emptied and subsequently refilled and the roof rests on its leg supports. When the roof is resting on its leg supports, the process of emptying or refilling shall be continuous and shall be accomplished as rapidly as possible [40 CFR 60.112b(a)(1)(i)]

- ii. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii)]
- iii. 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 shall be equipped with a cover or lid which is maintained in a closed position at all times (i.e., no visible gaps) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a)(1)(iv)]
- iv. Automatic bleeder vents shall be equipped with a gasket and be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a)(1)(v)]
- v. Rim space vents shall be equipped with a gasket and be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a)(1)(vi)]
- vi. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a)(1)(vii)]
- vii. Each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a)(1)(viii)]
- viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)]
- ix. A tank that is in-service shall be repaired or emptied upon identification in an inspection that the floating roof is not resting on the

surface of the VOL, there is liquid accumulated on the roof, the seal is detached, or there are holes or tears in the seal fabric. These actions shall be completed within 45 days of the inspection unless an extension is granted. [40 CFR 60.113b(a)(2) and (a)(3)(ii)]

x. A tank that is empty shall be repaired prior to refilling the tank upon identification in an inspection that the floating roof has defects, the primary seal has holes, tears or other openings in the seal or seal fabric, or the secondary seal has holes, tears or other openings in the seal or seal fabric, or the gaskets no longer close off. [40 CFR 60.113b(a)(3)(ii) and (a)(4)]

b. Operation of the Storage Tank A-44 shall not exceed the following limits:

VOL Throughput	
<u>(gal/month)</u>	<u>(gal/year)</u>
6,516,375	65,163,752

These limits are based on the recordkeeping requirements in Condition 7.3.7(b) and the compliance procedures referenced in Condition 7.3.12.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

The above limitations contain revisions to previously issued Permit 94100026. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the

primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, the previous emissions limitations on Storage Tank A-44, as established in Permit 94100026, i.e., the previous limit of 68,880,000 gal/yr, has been revised based upon the maximum VOL throughputs indicated in the CAAPP application. [T1R].

7.3.8 Inspection Requirements

The Permittee shall fulfill the applicable testing and procedures requirements of 40 CFR 60.113b(a) for each affected tank equipped with an internal floating roof as follows:

- a. 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 ever 12 months (Annual Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., the internal floating roof is not resting on the surface of the VOL inside the storage tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric) that the Permittee must repair or otherwise remove the storage tank from service. [40 CFR 60.113b(a)(2) and (a)(3)(ii)] or
- b. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes (if any), and sleeve seals (if any) each time the storage vessel is emptied and degassed (Out-of Service Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., 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) that the Permittee shall repair the features prior to refilling the storage tank with VOL. These inspections shall be performed at least every 5 years for tanks equipped with two continuous seals or otherwise at least every 10 years. [40 CFR 60.113b(a)(3)(ii) and (a)(4)]

Prior notification for the above inspection shall be given to the Illinois EPA as specified in Condition 7.3.10(b).

7.3.9 Recordkeeping Requirements

- a. The Permittee shall fulfill the applicable recordkeeping requirements of 40 CFR 60.115b for each affected tank pursuant to 40 CFR 60.115b(a), as follows:

Keep a record of each Annual and Out-of-Service Inspection performed as required by Condition 7.3.8(a) and (b). [40 CFR 60.115b(a)(2)]

- i. The date the inspection was performed;
 - ii. Who performed the inspection;
 - iii. The method of inspection;
 - iv. The observed condition of each feature of the internal floating roof (seals, roof decks and fittings), with the raw data recorded during the inspection; and
 - v. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with the Out-of-Service Inspection requirements of Condition 7.3.8(b)(i):

Records that are sufficient to identify whenever the tank is empty for any reason or whenever repairs are made as a result of regular inspection or incident of roof damage or defect.

- c. The Permittee shall keep the operating records required by 40 CFR 60.116b for each affected tank, as follows:

Records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]

- d. The Permittee shall maintain records of the VOM emissions from each affected storage tank in accordance with the procedures outlined in Condition 5.6, so as to demonstrate compliance with the emission limitations of Condition 7.3.6.

- e. Monthly records of VOL throughput through the affected emission units, gal/month and gal/year. Annual throughput shall be determined each month based upon throughput for the month of record plus the throughput of VOL for the 11 previous months. [T1]
- f. Monthly records of VOM emissions attributable to the affected emission unit, Storage Tank A-44, with calculations; tons/month and ton/year. Annual emissions shall be determined each month based upon emissions for the month record plus the emissions of the 11 previous months. [T1]

7.3.10 Reporting Requirements

- a. The Permittee shall submit written notifications and reports to the Illinois EPA, Compliance Section as required by the NSPS, for each affected tank, as follows:
 - i. A report identifying any deficiencies or shortcomings identified in the Annual Inspection required by Condition 7.3.8(a) within 30 days of inspection. This report shall include the information specified in 40 CFR 60.115b(a)(3).
 - ii. A. Notification at least 30 days prior to refilling an affected tank for which an Out-of-Service inspection is required by Condition 7.3.8(b)(i) to afford the Illinois EPA with the opportunity to have an observer present. [40 CFR 60.113b(a)(5)]

B. If the inspection is not planned and the owner or operator of the tank could not have known about refilling the tank 30 days in advance, a shorter notification may be accepted as provided for in 40 CFR 60.113b(a)(5).
 - iii. A report identifying any deficiencies or shortcomings identified in the Out-of-Service Inspection within 30 days of the inspection required by Condition 7.3.8(b)(i). This report shall include the information specified in 40 CFR 60.115b(a)(4).

- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:
 - i. Any storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.3.5, e.g., no "secondary seal," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
 - ii. Any storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.3.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
 - iii. Any exceedance of the emission and operational limits shown in Conditions 7.3.6(b) and 7.3.7(b), respectively.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.3 of this permit.
- b. Changes in seal type and configuration, made during the course of normal repair and maintenance of an affected storage tank's floating roof, provided the

tank continues to comply with the Conditions in Section 7.3 of this permit.

- c. Changes accounted for in Condition 5.8.

7.3.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use version 3.1 of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the source, the vapor wt percent (based on the 1992 USEPA survey, data developed by the Permittee or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

7.4 Group 4 Truck Loading Rack
Control: Vapor Recovery Unit

7.4.1 Description

The truck loading/unloading rack is used to load and unload various petroleum products, petroleum product additives, denatured ethanol, and other VOLs. The Permittee operates a loading rack that consists of four bays. The VOM emissions from the truck loading rack occur when material is loaded into delivery vehicles. A vapor recovery unit is used to capture and recover the emissions that occur as a result of displacement of vapors in the delivery vehicles during gasoline loading.

It should be noted, the VRU is used to control emissions during the loading of Sol-B at the adjacent but separate source (031012AEU). Loading emissions through the VRU during this operation are attributed to the source covered by this permit.

The VOM emissions from unloading material are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions that are attributed to leaking components, i.e., valves, flanges,...etc..

Interface/Transmix is not considered to be gasoline since the material is generated during the changeover of products within the pipeline or liquids handling systems and it is not used as a fuel for internal combustion engines.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date of Construction
Loading Rack with Vapor Recovery	Four bay loading rack used for loading various petroleum products into tank trucks	Vapor Recovery Unit (C01)	<p>Loading Rack: prior to December 17, 1980</p> <p>VRU: 1979</p>

7.4.3 Applicability Provisions and Applicable Regulations

An "affected loading rack," for the purpose of these unit-specific conditions, is a loading rack used to transfer petroleum products into a tank truck.

- a. Each affected loading rack at the source used to transfer VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294°K (70°F), e.g., ethanol and/or gasoline, is subject to 35 IAC 218.122(a), which requires that:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108. [35 IAC 218.122(a)]

Since no odor nuisance exists the limitations of this Condition shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294°K (70°F), e.g., ethanol and/or gasoline [35 IAC 218.122(c)]

In this case the Permittee relies on a vapor collection/recovery unit for compliance.

- b. Each affected loading rack at the source used to transfer gasoline into a delivery vessel (gasoline tank truck) is subject to 35 IAC 218.582.
- c. The VRU associated with the loading racks is subject to the monitoring requirements of 35 IAC 218.105(d)(2).

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected loading rack was constructed in 1964 and hence will not be subject to the requirements of 40 CFR 60 Subpart XX because it was not constructed or modified after December 17, 1980, pursuant to the NSPS for Bulk Gasoline Terminals.
- b. The affected railroad tank truck and trailer loading racks are not be subject to 35 IAC Part 218, Subpart TT, because they are subject to 35 IAC 218, Subpart B [35 IAC 218.980(a) and (b)]

7.4.5 Control Requirements and Operational Limitations

- a. The total organic compound emissions from the affected loading rack and associated vapor recovery unit shall not exceed 35 milligrams per liter of material loaded, pursuant to Sections 9.1(d) and 39 of the Act, so that the operation of this loading rack and vapor collection/recovery unit is not a major source for HAP subject to 40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).

This condition supercedes 35 IAC 218.582(a)(1) which requires that each affected loading rack be equipped and operated with a vapor control system that limits emissions of VOM to not more than 80 milligrams per liter (0.00067 lb/gal) of gasoline loaded from tank trucks during product loading.

- b. The Permittee shall not cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading into any tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108. At the time of issuance of this permit, the Illinois EPA has not approved any alternative to the submerged loading pipes. [35 IAC 218.122(a)]

7.4.6 Emission Limitations

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

N/A

7.4.7 Operating Requirements

- a. At all times during the loading of gasoline into any delivery vessel, the vapor control system shall operate and all vapors displaced in the loading of gasoline are to be vented only to the vapor control system. [35 IAC 218.582(a)(2)]

- b. There shall be no liquid drainage from the loading device of an affected loading rack when it is not in use. [35 IAC 218.582(a)(3)]
- c. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with an affected loading rack. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection. [35 IAC 218.582(b)(2), 218.582(b)(1)(A) and (C)]
- d. A reading equal to or greater than 100 percent of the lower explosive limit (LEL measured as propane) when tested in accordance with the procedure described in EPA 450/2-78-051 Appendix B, incorporated by reference in 35 IAC 218.112. [35 IAC 218.582(b)(1)(B)]
- e. All loading and vapor return lines shall be equipped with fittings that are vapor tight. [35 IAC 218.582(a)(4)]
- f. No person shall cause or allow the transfer of gasoline into a delivery vessel from an affected loading rack unless the delivery vessel displays the appropriate sticker pursuant to 35 IAC 218.584(b) or (d) or the delivery vessel has provided a current certification as required by 35 IAC 218.584(c)(3), and the delivery vessel meets the following requirements [35 IAC 218.582(a)(5)]:
 - i. Includes a vapor space connection that is equipped with fittings that are vapor tight;
 - ii. Has its hatches closed at all times during loading or unloading operations, unless a top loading vapor recovery system is used;
 - iii. Does not internally exceed a gauge pressure of 18 inches of water or a vacuum of 6 inches of water;
 - iv. Is designed and maintained to be vapor tight at all times during normal operations;

- v. Are tested annually in accordance with Method 27, 40 CFR 60, Appendix A. Each vessel must be repaired and retested within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, when it fails to sustain:
 - A. A pressure drop of no more than three inches of water in five minutes; and
 - B. A vacuum drop of no more than three inches of water in five minutes.

7.4.8 Inspection and Monitoring Requirements

Continuous monitoring equipment installed, calibrated, maintained and operated according to vendor specifications shall be used at all times the carbon adsorption unit is in use. The continuous monitoring equipment must monitor the VOM concentration of each carbon adsorption bed exhaust or the exhaust of the bed next in sequence to be desorbed. [35 IAC 218.105(d)(2)(A)]

7.4.9 Recordkeeping Requirements

a. General Recordkeeping

The Permittee shall maintain records of the following for each affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.4.5(c), and 7.4.6(a) and (b):

- i. The identification and properties of each organic liquid distributed through each affected loading rack, as related to emissions, i.e., storage temperature, vapor pressure and molecular weight;
- ii. Monthly throughputs of each organic liquid through each affected loading rack, gallons;
- iii. The annual source wide throughputs calculated by totaling the applicable throughputs for each specific organic liquid for the previous 12 months, with supporting calculations.
- iv. Total annual emissions of VOM and HAP from the each affected loading rack calculated by totaling the applicable emissions for the previous 12 months, tons/year, with supporting calculations. Emissions shall be calculated

utilizing an approved USEPA methodology, such as Section 5.2 of the AP-42 and the control efficiency of a VCU as demonstrated in the most recent test (See Condition 7.4.12).

b. Records of Operations

The Permittee shall maintain records of the following for the affected loading rack and associated vapor recovery unit to demonstrate compliance with Conditions 7.4.5 and 7.4.7:

- i. The use of an affected loading rack for loading of any gasoline tank truck when the associated VRU was not operating at the appropriate pressure drop, including:
 - A. The date and time of the loading;
 - B. The specific problem with the VRU monitor;
 - C. Type of material loaded; and
 - D. The reason that loading occurred even though the VRU was not operating at the appropriate pressure drop.

- ii. The use of an affected loading rack for the loading of any nonvapor-tight gasoline tank (one not meeting the requirements of Condition 7.4.7) or a delivery vessel that does not display the appropriate sticker or has not provided a current certification (one not meeting the requirements of Condition 7.4.7), including:
 - A. The date and time of the loading;
 - B. The specific reason the vessel did not meet the requirements of Condition 7.4.7;
 - C. Type of material loaded; and
 - D. The reason why loading was allowed.

c. Inspection Requirements

The Permittee shall keep the following records for each affected loading rack and associated vapor collection/recovery system which delivers liquid product into gasoline tank trucks.

A record of each leak inspection (Condition 7.4.8) shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

- i. Date of inspection;
 - ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak);
 - iii. Leak determination method;
 - iv. Corrective action, including the date each leak was repaired and the reasons for any repair interval in excess of 15 days; and
 - v. Name and signature of the person that performed the inspection.
- d. Gasoline Tank Truck Records

The Permittee shall keep the following records for the gasoline tank trucks loaded at this terminal:

- i. The tank truck vapor tightness documentation and/or certification required under 35 IAC 218.584(c)(3) (Condition 7.4.7); and
- ii. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include as a minimum, the following information:
 - A. Test title: Gasoline Deliver Tank Pressure Test - EPA Reference Method 27;
 - B. Owner name and address;
 - C. Tank identification number;
 - D. Testing location;
 - E. Date of test;
 - F. Tester name and signature;
 - G. Witnessing inspector, if any: name, signature, and affiliation; and

- H. Test results: Actual pressure change in 5 minutes, mm of water (average 2 runs).

7.4.10 Reporting Requirements

a. Annual Report

The Permittee shall provide an annual report, to be submitted with the source's annual emission report, which includes the following:

- i. The annual throughputs for each organic liquid through each affected loading rack
- ii. Annual emissions of VOM and HAP attributable to the loading of organic liquids for each affected loading rack; and
- iii. Summarization of any use of an affected loading rack to load delivery vessels (gasoline tank trucks) into trucks that did not meet the requirements of Conditions 7.4.7, including:
 - A. The date and time of the loading;
 - B. The specific reason the vessel did not meet the requirements of Condition 7.4.7;
 - C. Type of material loaded; and
 - D. The reason why loading was allowed.

b. Semi-Annual Reports

Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit a semi-annual report for any monitoring that is required. These reports shall be submitted by the end of January and July of each year and shall include the following information for the preceding 6 month period:

- i. Summary of any use of an affected loading rack when the VRU was not operating at the appropriate pressure drop, including:
 - A. Date and time of occurrence;
 - B. Specific problem associated with the VRU;

- C. Type of material being loaded; and
 - D. Reason why loading continued.
- ii. Summary of times when the continuous monitoring equipment was not functioning, including:
 - A. Date and time of occurrence; and
 - B. Specific problem associated with the indicator or recording equipment.
- c. Reporting of Non-compliance

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limits as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Notification within 15 days of operation of the affected loading rack and/or associated vapor recovery unit in excess of the limitations of Condition 7.4.6(a), 7.4.6(b) or 7.4.5(c).

- d. Reporting of Malfunction or Breakdown

The Permittee shall promptly notify the Illinois EPA, Maywood Region Office on the same or next working day of any malfunction or breakdown of any vapor recovery unit, documenting the time of occurrence and type of malfunction or breakdown. The Permittee shall also submit a quarterly report summarizing the quantity of emissions, the type and duration of each malfunction and the steps taken to reduce the occurrence of each malfunction or breakdown.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected loading rack without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.4.12 Compliance Procedures

- a. Compliance with the operational limitations of Condition 7.4.5(c), emission limitations of Condition 7.4.6(a) and (b) and the operating requirements of Condition 7.4.7 shall be demonstrated through the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.4.8, 7.4.9, and 7.4.10.
- b. Compliance with the control requirements of 7.4.5(a) and (b) shall be demonstrated by the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.4.8, 7.4.9, and 7.4.10 and the fact that compliance of the affected loading rack and associated vapor recovery unit have previously been demonstrated by fulfillment of the test requirements of 40 CFR 60.8 by measurement of the total organic concentration(s) in the effluent stream of the vapor recovery system pursuant to 40 CFR 60.503.
- c. Annual VOM emissions from the loading rack shall be determined by use of the following equation:

$$\text{Total Emissions (lb/year)} = \sum_{i=1} LL_i \times V_i$$

Where:

LL_i = Calculated loading loss emissions factors (lb/1000 gallon) for gasoline, distillates, denatured ethanol, interface/transmix...etc.

V_i = Throughput of gasoline, distillates, denatured ethanol, interface/transmix...etc. (gallon/year)

For example total emissions are usual calculated as follows:

Total Emissions (lb/year) = Gasoline Throughput x (LL_{Cg} + LL_{UCg}) + Distillate Throughput x LL_D + Denatured ethanol Throughput x LL_e + Interface/Transmix Throughput x LL_g +...etc.

Where LL_i is the loading loss emissions factors for gasoline, distillates, denatured ethanol and Interface/Transmix, respectively, based on the AP-42 equation for loading of tank trucks (Section 5.2).

$LL_{Cg} = 0.1329$ lb/1000 gallons of gasoline loaded
(Controlled emissions through the VRU, based
upon the results of previous stack tests
(15.93 mg/liter))

$LL_{Ucg} = 0.0755$ lb/1000 gallons of gasoline loaded
(Uncontrolled emissions based upon a
calculated uncontrolled emission factor of
5.8069 lb/1000 gallons and a 98.7% capture
efficiency)

$LL_D = 0.0118$ lb/1000 gallons of distillate loaded
(based on the calculation method shown below)

$LL_e = 0.8644$ lb/1000 gallons of denatured ethanol
loaded (based on the calculation method shown
below)

$LL_I = 1.3197$ lb/1000 gal of Interface/Transmix
(based on the calculation method shown below)

Where LL_i is the loading loss emissions factors for
gasoline, distillates, denatured ethanol and
Interface/Transmix, respectively, based on the AP-42
equation for loading of tank trucks (Section 5.2).

All other loading factors shall be determined, based
on the AP-42 equation for loading of tank trucks, as
follows:

$$LL_i = 12.46 \times [S_i \times P_i \times M_i/T_i] \times (1-E)$$

Where:

$LL_i =$ Loading losses, in lbs/1000 gal

$S_i =$ Saturation factor (unitless)

$P_i =$ True vapor pressure, in psia

$M_i =$ Molecular weight of vapors, in lb/lb-mole

$T_i =$ Temperature of bulk liquid loaded, in degrees
Rankine

$E =$ Control efficiency of the VRU, if applicable
($E = 0$ if no emission control is used).

- d. HAP emissions from the loading rack shall be
determined by speciating the individual HAP emissions
as a percentage of the gasoline and denatured ethanol

throughputs (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (c) above. Total HAP emissions will be based on the sum of the emissions for each individual HAP.

7.4.13 Compliance Schedules

- a. The Illinois EPA has determined that loading rack VRU is not in compliance with the monitoring requirements of 35 IAC 218.105(d)(2)(A). Therefore, the permit shield in Section 8.1 does not shield the Permittee from possible enforcement actions initiated by either USEPA or the Illinois EPA involving the above named emission units or activities. Compliance with the terms of this permit does not serve as proof of compliance for the VRU. The Permittee shall, if needed, apply for revision of this permit to address the resolution of any such enforcement action or other outstanding issue initiated pursuant to the alleged violations of 35 IAC 218.105(d)(2)(A). (e.g., include a new compliance schedule, identify appropriate applicable requirements, establish new requirements, and revise the ERMS baseline)
- b. The Permittee shall comply with the following schedule of compliance to address compliance with the alleged violations of 35 IAC 218.105(d)(2)(A):

Milestone	Timing
The Permittee shall achieve full compliance with 35 IAC 218.105(d)(2)(A) (See Condition 7.4.8)	No later than 180 days from the date issued of this permit
The Permittee shall achieve full compliance with all requirements resulting from resolution of enforcement issues regarding the alleged violation of 35 IAC 218.105(d)(2)(A)	No later than any schedule established pursuant to resolution of any pending or future enforcement action pertaining to the alleged violation of 35 IAC 218.105(d)(2)(A)

- c. Submittal of Progress Reports

A Progress Report shall be submitted every six months, beginning six months from the date of issuance of this permit to the Illinois EPA Compliance Section. The Progress Report shall contain at least the following:

- i. The required timeframe for achieving the milestones in the schedule for compliance, and actual dates when such milestones were achieved.
 - ii. An explanation of why any required timeframe in the schedule of compliance was not met, and any preventive or corrective measures adopted.
- d. The Permittee shall submit a written notification to the Illinois EPA Compliance Section with 15 days of coming into full compliance with 35 IAC 218.105(d)(2)(A).

7.5 Unit: Fugitives from Leaking Components
Control: None

7.5.1 Description

Fugitive emissions from equipment components, those not included in the loading rack emissions, such as valves, flanges,...etc., are generated during the processing of material through the piping distributed throughout the source.

7.5.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Equipment components (valves, flanges, pump seals, etc.)	Processing of material throughout the source's piping system	Work practices and equipment replacement

7.5.3 Applicability Provisions

There are no general rules or regulations that address the operation of these emission units located at a petroleum bulk terminal. However, pursuant to 35 IAC 218.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of VOL with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions. Note that pursuant to Condition 5.10, the source is shielded from determining compliance with 35 IAC 218.142.

7.5.4 Non-Applicable Regulations

This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart TT, because the potential to emit VOM from subject units does not exceed 25 tpy.

7.5.5 Control Requirements

None

7.5.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide limitations in Condition 5.5 that include the emissions from applicable units.

7.5.7 Operating Requirements

The Permittee shall repair any component from which a leak of VOL can be observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found. If the leaking component cannot be repaired until the process unit is shut down, the leaking component must then be repaired before the unit is restarted.

7.5.8 Inspection Requirements

The Permittee shall visually inspect for leaks from all affected equipment components on a monthly basis.

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the piping components at the source to demonstrate compliance with Condition 7.5.4 pursuant to Section 39.5(7)(b) of the Act.

- a. The number of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or vapor service, as applicable
- b. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.), tons/year, with supporting calculations, calculated utilizing the compliance procedures in Condition 7.5.12 or other approved USEPA methodology;

7.5.10 Reporting Requirements

None

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to these units without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.5.12 Compliance Procedures

Compliance with the fugitive VOM emission limitations of Condition 7.4 and pursuant to the overall VOM emissions limitation of Condition 5.5 shall be demonstrated through the calculation of the following equation:

Total Fugitive VOM Emissions (lb/hr) =

$$\sum_{i=1} EF_i \times N_i$$

Where:

EF_i = The specific component's (i.e., valves, pump seals, etc.) emission factor listed below. Emission factors found in "Protocol for Equipment Leak Emission Estimates" (EPA453/R-95-017), 1995 published by the USEPA or the best available emission factors, including factors developed by the source, are acceptable.

Component	Light Liquid ^a lb/component-hour	Vapor ^b lb/component-hour
Valves	9.48×10^{-5}	2.87×10^{-5}
Flanges	1.76×10^{-5}	9.26×10^{-5}
Open-Ended Lines	2.87×10^{-4}	2.65×10^{-4}
Pump Seals	1.19×10^{-3}	--
Other ^c	2.87×10^{-4}	--

a Light liquid - not in gas/vapor service or heavy liquid service.;

b Vapor - material in a gaseous state at operating conditions; and

c Other means any components other than flanges, valves, open-ended lines, and pump seals

N_i = Number of specific components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service as recorded in the records required in Condition 7.5.9.

Total annual emissions, in tons/year, shall be calculated by multiplying the hourly emission by 8760 hr/year.

Fugitive HAP emissions from equipment components, other than those included in the loading rack emissions, shall

be determined by speciating the individual HAP emissions as a percentage of the gasoline and denatured ethanol throughputs (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (c) above. Total fugitive HAP emissions will be based on the sum of the emissions for each individual HAP.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after March 23, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

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

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276

Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

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

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed,

contemporaneous operating logs, or other relevant evidence:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
 - ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification,

revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Storage Tank Features and Groupings

TABLE 1-1

<u>Group/Tank #</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Group 1							
A-14	4,082,400	Fixed roof	-	-	Distillate Petroleum Products*	0.50	1950
A-70	4,317,600	Fixed roof	-	-	Distillate Petroleum Products*	0.50	1950
A-80	4,271,400	Fixed roof	-	-	Distillate Petroleum Products*	0.50	1950
Group 2							
A-09	4,170,600	Internal floating roof	Vapor - mounted Resilient	-	Various Organic Liquids	5.80	1950
A-10	4,048,800	Internal floating roof	Mechanical Shoe	Rim- mounted	Various Organic Liquids	5.80	1950
A-11	3,759,000	Internal floating roof	Mechanical Shoe	-	Various Organic Liquids	5.80	1950
A-12	3,998,400	Internal floating roof	Mechanical Shoe	-	Various Organic Liquids	5.80	1950
A-30	3,788,400	Internal floating roof	Mechanical Shoe	-	Various Organic Liquids	5.80	1950

<u>Group/Tank #</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Max. Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
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*May be either Jet A or Diesel

Group 3 A-44	1,503,600	Internal floating roof	Vapor - mounted resilient	Rim- mounted	Various Organic Liquids	5.80	1995
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10.2 Attachment 2 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

MED:psj

I. INTRODUCTION

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

Equilon Enterprises LLC is located at 8600 West 71st Street in Bedford Park. The source is a petroleum bulk terminal for various petroleum products. Materials are transferred to the terminal by pipe line, tank truck or railcar where they may be temporarily stored prior to shipment of the material to different destinations via tank truck. A truck loading rack is used for this purpose.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Emission Control Equipment
Group 1 Storage Tanks (See Attachment 1 for details)	Fixed roof storage tanks with a capacity greater than 40,000 gallons	Permanent submerged fill
Group 2 Storage Tanks (See Attachment 1 for details)	Internal floating roof storage tanks - Not Subject to 40 CFR 60 Subpart Kb	Floating roof, either vapor - mounted resilient or mechanical shoe-mounted primary seal, either no secondary seal or a rim-mounted secondary seal, and a permanent submerged loading pipe
Group 3 Storage Tanks (See Attachment 1 for details)	Internal floating roof storage tanks - Subject to 40 CFR 60 Subpart Kb	Floating roof, , vapor - mounted resilient primary seal, rim-mounted secondary seal, and a permanent submerged loading pipe
Group 4 Tank truck loading rack	Four bay petroleum product truck loading rack	Vapor Recovery Unit
Fugitive emissions	Piping, valves, and pumps used to transfer materials between the pipe line storage tanks and loading/unloading rack	None

III. EMISSIONS

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

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	273.21
Sulfur Dioxide (SO ₂)	--
Particulate Matter (PM)	--
Nitrogen Oxides (NO _x)	--
HAP, not included in VOM or PM	--
TOTAL	273.21

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal 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 permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

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

Title I

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

ERMS SOURCES

Because this source is located in the Chicago ozone non-attainment area and emits volatile organic material (VOM), the permit includes conditions to implement the Emissions Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as further described in Section 6.0 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS, and identifies units not subject to further reductions. The permit also provides that the source must begin to operate under the ERMS following the initial issuance of allotment trading units to the source. This will occur for the 2000 seasonal allotment period (rather than the 1999 season as originally intended by the ERMS) due in part to delays in the initial issuance of CAAPP Permits. These delays, which have occurred nationally, are attributable to a variety of causes including the unforeseen complexity of processing these permits and gaps in national guidance. Even though operation under the ERMS will not officially start until the 2000 seasonal allotment period, detailed recordkeeping and reporting of seasonal emissions was required beginning in 1998, which will document emissions reductions achieved by sources in 1999 in preparation for the ERMS.

VI. REQUEST FOR COMMENTS

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

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

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