

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

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

Titan Tire Corporation of Freeport
3769 Route 20 East, Freeport, Stephenson County, 61032

Illinois EPA ID Number: 177813AAA

Application Number: 95120073

Application Type: Renewal

Start of Public Comment Period: October 28, 2009

Close of Public Comment Period: November 27, 2009

Permit Engineer/Technical Contact: Anatoly Belogorsky, 217/782-2113

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

I. INTRODUCTION

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

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

II. GENERAL SOURCE DESCRIPTION

a. Nature of source

Titan Tire Corporation of Freeport is located at 3769 Route 20 East in Freeport and manufactures rubber tires primarily for agricultural and farm equipment, and some light industrial.

b. Ambient air quality status for the area

This source is located in an area that is designated as attainment for all criteria pollutants.

c. Major source status

This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

d. Source Emissions

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

Pollutant	Annual Emissions (tons)				
	2003	2004	2005	2006	2007
CO	19.01	20.58	22.96	16.32	16.6
NOx	37.84	38.20	21.62	31.65	33.19
PM	48.04	51.94	49.38	39.9	38.65
SO ₂	0.08	0.1	0.13	0.07	0.07
VOM	306.6	293.8	317.86	186.09	202.3

III. NEW SOURCE REVIEW / TITLE I CONDITIONS

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

IV. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source. In addition, the draft permit requires the source to certify its compliance status on an annual basis. Also, the Annual Emission Reports and latest inspection report have been reviewed which indicate compliance.

V. PROPOSED ILLINOIS EPA ACTION / REQUEST FOR COMMENTS

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

Comments are requested by the Illinois EPA for the draft or proposed permit, pursuant to 35 IAC Part 252 and Sections 39.5(8) and (9) of the Illinois Environmental Protection Act. A final decision on the draft or proposed permit will not be made until the public, affected states, and USEPA have had an opportunity to comment. The Illinois EPA is not required to accept recommendations that are not based on applicable requirements. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.

ATTACHMENT 1: Summary of Source-Wide Requirements

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

Program/Plan	Applicable
Emissions Reduction Market System (ERMS)	N/A
Nitrogen Oxides (NO _x) Trading Program	N/A
Acid Rain Program	N/A
Fugitive Particulate Matter (PM) Operating Program	N/A
Risk Management Plan (RMP)	N/A
PM ₁₀ Contingency Measure Plan	N/A

- b. The following table indicates source-wide site-specific requirements addressed in Section 5 of the draft permit.

Non-Applicable Rules and Requirements w/justification
<ul style="list-style-type: none"> • 40 CFR Part 63, Subpart XXXX "National Emissions Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing": source is non-major source for HAP emissions with the PTE limits below 10/25 tons/year being established in Condition 5.6.2 • The manufacturing of rubber tires with a bead diameter more than 0.5 meter (19.7 inches) and a cross section dimension more than 0.325 m (12.8 inches) are excluded from applicability of 40 CFR Part 60, Subpart BBB.
Title I Conditions and/or Synthetic Minor Limits
<ul style="list-style-type: none"> • N/A
Testing, Monitoring and Recordkeeping
<ul style="list-style-type: none"> • <u>Testing</u>: General testing requirements; HAP testing for verifying minor source status
<ul style="list-style-type: none"> • <u>Emission Monitoring</u>: None
<ul style="list-style-type: none"> • <u>Recordkeeping</u>: General recordkeeping requirements; Records of source-wide HAP emissions; Records required by 40 CFR 63.10(b)(3) to assure that the source still a minor source for HAP's.

ATTACHMENT 2: Summary of Requirements for Specific Emission Units

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

Table 1 (Section 7.1 of the draft permit)

Emission Unit	
Name	Carbon Black Handling Units (Silos and Unloading/Conveying Lines)
Description	The material is stored in silos and transferred to mixers by sealed conveyors
Date Constructed	
Emission Control Equipment	Baghouses
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.321(a) • 35 IAC 212.123(a)
Streamlining	N/A
Title I Conditions	N/A
Other Emission Limits	N/A
Non-applicability (reason)	Not subject to CAM: potential pre-control emissions are less than major source threshold.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, and 35 IAC 212.109. • Frequency: once in five years at the time of CAAPP renewal
Emissions Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Operational Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> • Amount of carbon black processed and amount of emissions being released

Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • See Attachment 3 for Prompt Reporting of Deviations
Other Reporting	N/A
Other Information	
Footnotes	N/A

Table 2 (Section 7.2 of the draft permit)

Emission Unit	
Name	Blending and Mixing Units
Description	A variety of pigments are processed (mixed and weighed) prior to being added to the mixers. Mixers are the primary components for producing the rubber compounds that are used for tires. Operated in a batch mode, the mixers blend the raw materials together to form feedstock for the remaining processes
Date Constructed	
Emission Control Equipment	Dust Collectors
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.321(a) • 35 IAC 212.322(a) • 35 IAC 215.301 • 35 IAC 212.123(a)
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • T1 conditions being carried over from initial CAAPP and PSD Permit 01040070
Other Emission Limits	N/A
Non-applicability (reason)	<ul style="list-style-type: none"> • Not subject to CAM: potential pre-control emissions are less than major source threshold.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Testing of VOM emissions is required only the Permittee decides to take credit by using lower emission factor than established currently in the CAAPP
Emissions Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d) • Records of material throughput and VOM emissions (Condition 7.2.9) associated with affected operations are sufficient to monitor compliance with emission/production limits identified in Condition 7.2.6
Operational Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> • Throughput of different raw materials • Records of emissions released

Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • See Attachment 3 for Prompt Reporting of Deviations
Other Reporting	N/A
Other Information	
Footnotes	N/A

Table 3 (Section 7.3 of the draft permit)

Emission Unit	
Name	Extrusion/Calendering Areas
Description	Extruder #2 produces tire components by combining a variety of rubber compounds and extruding them into the desired shapes of either tread or sidewall. The calendar lines combine fabric and rubber compounds to produce the materials used in the construction of tires
Date Constructed	
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.321(a) • 35 IAC 212.322(a) • 35 IAC 215.301 • 40 CFR Part 60, Subpart BBB and 35 IAC 215.463 (Extruder #2)
Streamlining	N/A
Title I Conditions	N/A
Other Emission Limits	N/A
Non-applicability (reason)	<ul style="list-style-type: none"> • 40 CFR Part 64 (CAM) - no control is utilized
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • For Extruder #2, to verify compliance with VOM emission limit (g/tire), monthly performance tests shall be conducted pursuant to 40 CFR 60.543(d)
Emissions Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Operational Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d) • Monitoring of PM emissions based on the process weight rate requirements (Cond.7.3.3(b) and (c)) is not required because of the negligible effect of PM emissions from calendar/extrusion lines
Inspections	N/A

Recordkeeping	<ul style="list-style-type: none"> • Records of material throughput • VOM content in each cement used • Records of emissions released • Records of the monthly performance tests
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • See also Attachment 3 for Prompt Reporting of Deviations
Other Reporting	<ul style="list-style-type: none"> • Reports on Deviations • Reports required by 40 CFR 60.546 (c) and (f)
Other Information	
Footnotes	N/A

Table 4 (Section 7.4 of the draft permit)

Emission Unit	
Name	Bead Preparation Areas
Description	The bead units combine wire and rubber compounds to produce tire beads, which are utilized in the construction of tires. Rubber extruders and winders process the materials to form the tire beads
Date Constructed	
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.321(b)(1) • 35 IAC 215.301
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • VOM containing materials and VOM emissions: T1 conditions being carried over from permit 79010006
Other Emission Limits	N/A
Non-applicability (reason)	<ul style="list-style-type: none"> • 35 IAC 215.461: exemption criteria for tires (inside bead diameter more than 19.7 inches) • 40 CFR 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry": exemption criteria for tires (inside bead diameter more than 19.7 inches) • 40 CFR Part 64 (CAM): no control is utilized
Periodic Monitoring (other than basic regulatory requirements)	
Testing	N/A
Emissions Monitoring	<ul style="list-style-type: none"> • Recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Operational Monitoring	<ul style="list-style-type: none"> • Recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d) • Monitoring of PM emissions based on the process weight rate requirements (Cond.7.4.3(b)) is not required because of the negligible effect of PM emissions from the bead preparation machines
Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> • Cement/solvent usage • VOM content in cement/solvents used • Records of emissions being released

Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • See also Attachment 3 for Prompt Reporting of Deviations
Other Reporting	<ul style="list-style-type: none"> • N/A
Other Information	
Footnotes	N/A

Table 5 (Section 7.5 of the draft permit)

Emission Unit	
Name	Green Tire Spray Booths
Description	The assembled uncured (green) tires are sprayed with a water-base inside tire lining and an organic solvent-base precure.
Date Constructed	
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.321(b)(1) • 40 CFR 60.542(a)(5) • 40 CFR 60.542(a)(7) • 35 IAC 215.463
Streamlining	
Title I Conditions	<ul style="list-style-type: none"> • Farm Spray Booth #1: production and emission limits originated in the permit 00010072
Other Emission Limits	N/A
Non-applicability (reason)	<ul style="list-style-type: none"> • 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry": definition of "tire" in 40 CFR 60.541(a) and criteria of applicability in 40 CFR 60.540(a) • 35 IAC 215.462: definition of "pneumatic rubber tire manufacture" in 35 IAC 211.4790 • Passenger Spray Booth #1 and Farm Spray Booth #1 are not subject to 35 IAC 215.462: 35 IAC 215.463 and Condition 7.5.3(e) • 40 CFR Part 64 (CAM) - no control is utilized
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • To verify compliance monthly VOM emission limit (kg/mo), monthly performance tests shall be conducted pursuant to 40 CFR 60.543(b)(1) • Monthly performance tests (for Passenger Spray Booth #1 and Farm Spray Booth #1) shall be conducted pursuant to 40 CFR 60.543(d)
Emissions Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)

Operational Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> • Records required by 40 CFR 60.545(f) • Records required by 40 CFR 60.545(d) • Solvent usage • Separate production records for NSPS and non NSPS units • Records of emissions being released
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • See also Attachment 3 for Prompt Reporting of Deviations
Other Reporting	<ul style="list-style-type: none"> • 40 CFR 60.546(f)(1): exceedance of monthly average VOM emission rate (g/tire) • 40 CFR 60.546(f)(2): exceedance of monthly average VOM emission rate (kg/mo) • 40 CFR 60.546(j): water-based spraying operations
Other Information	
Footnotes	N/A

Table 6 (Section 7.6 of the draft permit)

Emission Unit	
Name	Curing Presses
Description	The assembled green tires are dried and cured in presses
Date Constructed	
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 215.301
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • PSD Permit 01040070: T1 conditions, with emission/production limits
Other Emission Limits	N/A
Non-applicability (reason)	<ul style="list-style-type: none"> • 40 CFR Part 60, Subpart BBB "Standards of Performance for the Rubber Tire Manufacturing Industry": no cementing or green tire spraying operations performed • 35 IAC 215.461 and 215.462: no cementing or green tire spraying operations performed • 40 CFR Part 64 (CAM): no control is utilized
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Testing of VOM emissions is required only the Permittee decides to take credit by using lower emission factor than established currently in the CAAPP
Emissions Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d) • Because curing presses do not apply any solvents and are function of spray booths, monitoring/compliance with 35 IAC 215.301 is addressed in Section 5 of the CAAPP
Operational Monitoring	<ul style="list-style-type: none"> • Testing, recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Inspections	N/A

Recordkeeping	<ul style="list-style-type: none"> • Records of production throughput • Verification of currently used emission factors • Released emissions
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • See also Attachment 3 for Prompt Reporting of Deviations
Other Reporting	N/A
Other Information	
Footnotes	N/A

Table 7 (Section 7.7 of the draft permit)

Emission Unit	
Name	Boilers
Description	Natural gas-fired boilers used to produce heat and steam for the source needs
Date Constructed	
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 216.121 • 35 IAC 212.123
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • Permit 95010051: T1 conditions, with emission/production limits
Other Emission Limits	N/A
Non-applicability (reason)	<ul style="list-style-type: none"> • 35 IAC 217.141: less than 250 MBtu/hr • 35 IAC 215.303: any fuel combustion emission unit is not subject to 35 IAC Part 215, Subpart G: Use of Organic Material • 40 CFR Part 64 (CAM): no control is utilized
Periodic Monitoring (other than basic regulatory requirements)	
Testing	N/A
Emissions Monitoring	<ul style="list-style-type: none"> • Recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Operational Monitoring	<ul style="list-style-type: none"> • Recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> • Records of natural gas usage • Released emissions
Reporting	

Prompt Reporting	<ul style="list-style-type: none"> See also Attachment 3 for Prompt Reporting of Deviations
Other Reporting	N/A
Other Information	
Footnotes	N/A

Table 8 (Section 7.8 of the draft permit)

Emission Unit	
Name	Turbines
Description	Turbines are used as needed for electric power generation for facility needs
Date Constructed	
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> 35 IAC 215.301 35 IAC 212.123 35 IAC 214.301 40 CFR Part 60, Subpart GG "Standards of Performance for Stationary Gas Turbines": <ul style="list-style-type: none"> 40 CFR 60.333(a) 40 CFR 60.332(a)(2) and 60.332(c)
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> Permit 95010051: T1 conditions, with emission and natural gas usage limits
Other Emission Limits	N/A
Non-applicability (reason)	<ul style="list-style-type: none"> 35 IAC 212.321: do not have a process weight rate as defined in 35 IAC 211.5250. 35 IAC 217.141: less than 250 MBtu/hr 35 IAC 216.121: the affected turbines are not by definition fuel combustion emission units. 40 CFR Part 64 (CAM): no control is utilized
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> Analytical and computation methods of determining compliance, as required by 40 CFR 60.335(d), 40 CFR 60.332, 40 CFR 60.333
Emissions Monitoring	<ul style="list-style-type: none"> Recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)

Operational Monitoring	<ul style="list-style-type: none"> Recordkeeping and reporting requirements are sufficient to meet the periodic monitoring pursuant to 39.5(7)(d)
Inspections	N/A
Recordkeeping	<ul style="list-style-type: none"> Records of natural gas usage Nitrogen and sulfur content Released emissions
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> See also Attachment 3 for Prompt Reporting of Deviations
Other Reporting	N/A
Other Information	
Footnotes	N/A

ATTACHMENT 3: Prompt Reporting of Deviations

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

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

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

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

The Illinois EPA generally uses a time frame of 30 days to define prompt reporting of most deviations. Also, for certain permit conditions in individual permits, the Illinois EPA may require an alternate timeframe that is less than 30 days if the permit requirement justifies a shorter reporting time period. Under certain circumstances, EPA may establish a deviation reporting period longer than 30 days, but, in no event exceeding 6 months. Where it has established a deviation reporting period other than 30 days in an individual permit

(specifically Section 7.x.10), the Illinois EPA has explained the reason for the alternative timeframe. (See Attachment 2 of this Project Summary.)

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

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

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

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

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

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

- 40 CFR 71.6(a)(3)(iii)(B) specifies that certain potentially serious deviations must be reported within 24 or 48 hours, but provides for semi-annual reporting of other deviations. (Serious or severe consequences)
- FR Vol. 60, No. 134, July 13, 1995, pg. 36086 states that prompt should generally be defined as requiring reporting within two to ten days of the deviation, but longer time periods may be acceptable for a source with a low level of excess emissions. (intermediate consequences)
- Policy Statement typically referred to as the "Audit Policy" published by the USEPA defines prompt disclosure to be within 21 days of discovery. (Standard for most "pollutant limiting" related conditions)
- Responses to various States by USEPA regarding other States' definition of prompt.

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