

217/782-2113

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

PERMITTEE

U.S. Tobacco Manufacturing L.P.
Attn: Karl Boldt
100 West Putnam Ave.
Greenwich, CT 06830

Application No.: 95120071 I.D. No.: 031096AIJ
Applicant's Designation: USTM LP Date Received: December 6, 1995
Operation of: Tobacco Products Manufacturing
Date Issued: October 26, 2000 Expiration Date²: October 26, 2005
Source Location: 11601 Copenhagen Court, Franklin Park, Cook
Responsible Official: John W. Gramlich, Vice President/Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a tobacco products manufacturing plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: April 12, 2001
Revision Date Issued: July 10, 2001
Purpose of Revision: Minor Modification

This minor modification contains changes to the maximum sulfur content in the diesel fuel used in the emergency generator.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued October 26, 2000 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

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

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

DES:YY:jar

cc: Illinois EPA, FOS, Region 1

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

United States Tobacco Manufacturing Limited Partnership
11601 Copenhagen Court
Franklin Park, Illinois 60131
847/957-8200

I.D. No.: 031096AIJ
Standard Industrial Classification: 2131, Manufacture of Chewing
Tobacco and Snuff

1.2 Owner/Parent Company

United States Tobacco Manufacturing Limited Partnership
100 West Putnam Ave.
Greenwich, Connecticut 06830

1.3 Operator

United States Tobacco Manufacturing Limited Partnership
11601 Copenhagen Court
Franklin Park, Illinois 60131

Phillip Snave
847/957-8200

1.4 General Source Description

The U.S. Tobacco Manufacturing L.P. Franklin Park Plant is located at 11601 Copenhagen Court, Franklin Park, Illinois. The source primarily manufactures moist snuff tobacco products, which are packaged and shipped for consumer use. This includes curing, finishing, and packaging of tobacco. Ancillary processes at the plant include a cutting and drying line (Dry Flour Contingency), a paper can manufacturing line, the Flavor Pack operation, a warehouse and shipping operation, and a heating plant.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
ACMA	Alternative Compliance Market Account
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
ATU	Allotment Trading Unit
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
CO	Carbon Monoxide
dscf	dry standard cubic feet
dscm	dry standard cubic meters
ERMS	Emissions Reduction Market System
F	Fahrenheit
ft ³	cubic feet
g	grams
gr	grains
HAP	Hazardous Air Pollutant
HP or hp	Horse Power
hr	hour
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilograms
kW	kilowatts
lb	pound
Mg	Megagrams
mm	millimeters
mmBtu	Million British thermal units
mmcf	million cubic feet
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀ or 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

RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
SO ₂	Sulfur Dioxide
T	tons
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
USEPA	United States Environmental Protection Agency
USTM LP	U. S. Tobacco Manufacturing Limited Partnership
VOM	Volatile Organic Material
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:

- Moisturizing cylinder
- Conditioning cylinder
- Casing cylinder
- Can packing machines (10)

- 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:

- Tobacco use bins (2)
- Tin lids sprayers (2)
- Label applicators (11)
- Steam chambers (2)
- Tobacco storage silos (4)
- Tobacco cutting machines (2)
- Portion packers (27)
- Pouch makers (2)
- Return goods shredder

- 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)].

Equipment used for filling drums, pails, or other packaging containers, excluding aerosol cans, with soaps, detergents, surfactants, lubricating oils, waxes, vegetable oils, greases, animal fats, glycerin,

sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(8)].

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)].

Storage tanks of virgin or refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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	Date Constructed	Emission Control Equipment
Particulate Emission Sources			
Dry Flour Contingency	Casing, cutting, and drying of aged tobacco	June 1992	Baghouses 1, 2, & 3
Tobacco Dryer	Moisture control of tobacco	June 1992	Cyclone/Scrubber
Paper Can Line/Shredder/Cyclone	Manufacture of small paper cans	Sept. 1972	Paper Can Baghouse
Weigh Room	Weighing of granulated or powdered salts	Sept. 1972	None
VOM Emission Sources			
First Pickle and Curing/Cure Turning	Blending of tobacco with liquids and holding and turning of tobacco and liquids	Dec. 1996 and 1973	RTO
Finishing	Addition of final flavor solution	June 1992	RTO
Flavor Coaters (6)	Addition of special flavoring	4/93, 7/94, & 12/95	Filter & RTO
Wipe Cleaning	Cleaning of equipment with solvent	-	None
Natural Gas-Fired Combustion Emission Sources			
300 HP Boilers (2)	Natural gas fired boilers	April 1989	None
150 HP Boilers (2)		April 1989	None
250 HP Boilers (2)	Thermal Oxidizer	May 1992	None
RTO		Feb. 1995	-
Standby Emergency Diesel Engine	Electric Generator	Dec. 1999	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 volatile organic material 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.
 - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
 - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
 - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical

dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

- c. 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.

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 Risk Management Plan

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.

- 5.2.5 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.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
- i. Illinois EPA, Compliance Section; and

- ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
- iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

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:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, 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)	27.49
Sulfur Dioxide (SO ₂)	0.970
Particulate Matter (PM)	80.52
Nitrogen Oxides (NO _x)	41.05
HAP, not included in VOM or PM	4.326
TOTAL	154.4

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

The annual VOM emissions from these emission units shall not exceed the following limitations:

<u>Emission Unit</u>	<u>Emissions*</u> <u>(Tons/Year)</u>	<u>Underlying</u> <u>Rules</u>
Casing Cylinder	0.79	35 IAC 218.980(d)
Steam Chambers	0.44	35 IAC 218.980(d)
All Portion Packers	0.50	35 IAC 218.980(d)
All Can Packers	2.4	35 IAC 218.980(d)
All of the above sources plus the Tobacco Dryer	5.0	35 IAC 218.980(d)

* Emissions are per calendar year

The limits on VOM are limitations established in Permit 93080108. These limits ensure that the affected emission units are not subject to the control requirements of 35 IAC Part 218, Subpart TT, Other Emission Units. [T1]

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 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

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source 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.
- b. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart TT shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements. [35 IAC 218.990]

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

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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.

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 should 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 permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is

based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Particulate Emission Sources
Control Baghouses and Cyclone/Wet Scrubber

7.1.1 Description

The Dry Flour Contingency area contains a series of equipment that can process raw material (tobacco) into a cut, sized, and conditioned intermediate product that can then be used in the moist snuff manufacturing process of USTM LP's Franklin Park or Nashville Plants.

The tobacco dryer is a steam-heated dryer used for moisture control of tobacco products from the Dry Flour Contingency area. This unit also emits some VOM.

The Paper Can line receives paper in rolls and cuts and forms them into small 2.5 inch diameter by one inch deep paper cans. This process generates scrap pieces of paper and a small amount of paper dust through the cutting and stamping process. In addition, a cardboard box shredder discharges shredded cardboard along with the scrap paper cuttings into the collection cyclone. The compacted/baled scrap is sold to a recycler.

The weigh room is an area where granulated or powdered salts are manually dumped from paper bags into a large bucket. There is a hood and exhaust fan over the bucket to collect fugitive dust generated during the dumping of salts.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Dry Flour Contingency		
Dry Flour Casing Line	case tobacco	Baghouse No. 1
Dry Flour Cutting Line	cut tobacco	Baghouse No. 2
Dry Flour Drying Line	dry tobacco	Baghouse No. 3
Tobacco Dryer	dry tobacco with steam-heat	Cyclone/Wet Scrubber
Paper Can Department		Paper Can Baghouse
Paper Can Line	make paper cans	
Cardboard Shredder	shred cardboard	
Cyclone	collect scrap	
Weigh Room	weigh salt	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected emission units" for the purpose of these unit-specific conditions, are the Dry Flour Contingency area, the tobacco dryer, the Paper Can line, and the weigh room.
- b. Each affected emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. Each affected emission unit at the source is subject to 35 IAC 212.321, which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in Condition 7.1.3(c)(ii) [35 IAC 212.321(a)].
 - ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected emission units shall not exceed the allowable emission rates specified in the following equation

$$E = A(P)^B$$

Where:

P = Process weight rate; and,
E = Allowable emission rate; and,

For process weight rates up to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

[35 IAC 212.321(b)]

7.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the tobacco dryer not being subject to the control requirements of 35 IAC 218.986, because the tobacco dryer has emissions of VOM to the atmosphere less than 2.3 Mg (2.5 tons) per calendar year. [35 IAC 218.980(d)].

7.1.5 Control Requirements

- a. All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods. [35 IAC 212.307]
- b. Crushers, grinding mills, screening operations, bucket elevators, conveyor transfer points, conveyors, bagging operations, storage bins and fine product truck and railcar loading operations shall be sprayed with water or a surfactant solution, utilize choke-feeding or be treated by an equivalent method in accordance with an operating program. [35 IAC 212.308]
- c. Emissions from particulate collection equipment operated pursuant to Conditions 7.1.5(a) or (b) above shall not exceed 68 mg/dscm (0.03 gr/dscf) [35 IAC 212.313]

7.1.6 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:

- a. Emissions from the affected Dry Flour Contingency Process emission units shall not exceed the following limits:

Process Equipment	Process Weight Rate (T/hr)	Operating Hours (hr/yr)	Particulate Matter Emissions	
			(lb/hr)	(T/yr)
Casing (picker, feeders)	6.00	2,080	6.6	6.9
Cutting (feeder, bulking bins, cutters)	5.00	4,160	6.0	12.5

Sifting* (sifters, feeders, bucket elevators)	4.00	4,160	5.3	11.1
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* Called Drying in this permit

The process weight and operating hours limitations are for each individual item of equipment making up a process segment (each line item under the "Process Equipment" heading). However, the particulate matter emissions rate limitations are for each process segment (e.g., casing line).

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) [T1].

The above limitations were established in Permit 93080108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- b. Emissions from the affected Tobacco Dryer emission unit shall not exceed the following limits:

Operating Hours <u>(hr/yr)</u>	Particulate Matter Emissions		VOM Emissions	
	<u>(lb/hr)</u>	<u>(T/yr)</u>	<u>(lb/hr)</u>	<u>(T/yr)</u>
4,160	0.1	0.44	1.10	2.29

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) [T1].

The above limitations were established in Permit 93080108. These limits ensure that the affected emission unit is not subject to the control requirements of 35 IAC Part 218, Subpart TT, Other Emission Units.

The above limitations were also established in Permit 93080108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- c. Emissions from the affected Paper Can Line/Shredder/Cyclone emission unit shall not exceed the following limits:

Process Equipment	Process Weight Rate (lb/hr)	Operating Hours (hr/yr)	Particulate Matter Emissions	
			(lb/hr)	(T/yr)
Paper can department	9,700	4,992	11.8	29.5

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) [T1].

The above limitations were established in Permit 93080108, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

- d. Emissions from the affected Weigh Room emission unit shall not exceed the following limits:

Process Weight Rate (T/hr)	Operating Hours (hr/yr)	Particulate Matter Emissions	
		(lb/hr)	(T/yr)
1.0	3,120	2.5	3.9

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) [T1].

The above limitations were established in Permit 93080108, pursuant to 40 CFR 52.21, Prevention of

Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.1.7 Operating Requirements

None

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected emission unit to demonstrate compliance with Conditions 5.5.1, 7.1.3, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Production rate (T/hr, T/mo, and T/yr)
- b. Run time (hr/mo and hr/yr)

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected emission unit 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.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. The following emission factors shall be used for calculating particulate emissions:

<u>Process Equipment</u>	<u>Emission Factor (lb/T)</u>
Sifting/Screening	3.0 ¹
Drying	0.3 ²
Casing and/or Moistening and/or Conditioning	0.15 ³
Unloading/Loading to/from Storage Silos (pneumatic conveying, controlled with integral baghouse)	0.006 ⁴
Conveying/Handling (dried tobacco)	1.0 ⁵
Conveying/Handling (fresh, conditioned, or moistened tobacco)	0.5 ⁶
Paper can department	1.44 ⁷
Cardboard shredder	6 ⁸
Weigh room	1.5 ⁹

1. From AP-42, Uncontrolled grain cleaning
2. From AP-42, Uncontrolled rice drying
3. Modified from AP-42 factor for rice drying with 50 percent reduction factor due to application of moisture
4. From AP-42, Grain loading to barge (controlled with fabric filter)
5. From AP-42, Uncontrolled grain conveying (gallery belt/tunnel belt)
6. Modified from AP-42 factor for dried tobacco with 50 percent reduction factor due to the handling of tobacco with a high moisture content and/or whole tobacco leaf
7. From engineering analysis
8. From AP-42, Miscellaneous emission sources at cotton ginning plants
9. From AP-42, Dumping pulverized limestone into open bed trucks

- b. The following control efficiencies shall be used for calculating particulate emissions:

<u>Control Device</u>	<u>Control Efficiency</u>
Cyclone	0.65 ¹
Baghouse (fabric filter)	0.99 ²
Wet Scrubber	0.90 ³

1. From AP-42, Collection efficiency of medium-efficiency cyclone on PM-10 (conservatively applied to total particulate)
 2. From AP-42, Collection efficiency of low-temperature fabric filter on PM-10 (conservatively applied to total particulate)
 3. From AP-42, Collection efficiency of high-efficiency wet scrubber on PM-10 (conservatively applied to total particulate)
- c. The following general equation shall be used for calculating particulate emissions for each piece of process equipment:

$$E = PR \times EF \times (1 - CE)$$

Where:

E = Emission rate (lb/hr, T/mo, or T/yr)

PR = Process rate (T product per hr, mo, or yr)
(To convert from pounds to tons divide by 2000)

EF = Emission factor from Condition 7.1.12(a)

CE = Control efficiency from Condition 7.1.12(b)

- d. Emissions from each piece of process equipment shall be calculated using the equation in Condition 7.1.12 (c), then all the emissions from the process equipment associated with each emission unit shall be added to find the total emissions for a particular emission unit. Each emission unit contains the following process equipment:
- i. Dry Flour Contingency:
 - A. Dry Flour Casing Line:

4 Vibrating Conveyors connected to baghouse (EF = 0.5, CE = 0.99)

Lamina Feeder connected to baghouse
(EF = 0.5, CE = 0.99)

Hogshead Picker connected to baghouse
(EF = 0.5, CE = 0.99)

Feeder Regulator/Belt Weigher connected to
baghouse (EF = 0.5, CE = 0.99)

B. Dry Flour Cutting Line:

5 Vibrating Conveyors connected to
baghouse (EF = 0.5, CE = 0.99)

Dryer Feed Regulator/Belt Scale connected
to baghouse (EF = 0.5, CE = 0.99)

C. Dry Flour Drying Line:

3 Vibrating Conveyors connected to
baghouse (EF = 1.0, CE = 0.99)

Bucket Elevators connected to baghouse
(EF = 1.0, CE = 0.99)

Sifter, first pass, connected to baghouse
(EF = 3.0, CE = 0.99)

Sifter, second pass, connected to cyclone
and baghouse (EF = $3.0 \times (1 - 0.65)$,
CE = 0.99)

Sifter Screw Feeders connected to baghouse
(EF = 1.0, CE = 0.99)

ii. Tobacco Dryer

Dryer, connected to cyclone and baghouse
(EF = 0.3, CE = $1 - [(1 - 0.65) \times (1 - 0.90)]$)

iii. Paper Can Line/Shredder/Cyclone

Paper Can Department (EF = 1.44), connected to
cyclone (CE = 0) and baghouse (CE = 0.99)

Paper Shredder (EF = 6), connected to cyclone
(CE = 0) and baghouse (CE = 0.99)

iv. Weigh Room

Weigh Room, uncontrolled (EF = 1.5, CE = 0)

- e. VOM emissions from the Tobacco Dryer shall be calculated using the following formula:

$$E = PR \times EF$$

Where:

E = Emission rate (lb/hr, T/mo, or T/yr)
PR = process rate (T product per hr, mo, or yr)
(To convert from pounds to tons divide by 2000)
EF = emission factor = 0.22 (from stack testing
of similar equipment)

7.2 Unit VOM Emission Sources
Control Thermal Incinerator (RTO)

7.2.1 Description

The USTM LP Curing/Cure Turning process utilizes ethanol, a volatile organic material, in its moist snuff tobacco manufacturing process. The VOM used at the plant is added to tobacco with flavorings. These materials are blended in one or more of three casing cylinders in the First Pickle area of the plant. The tobacco is then transferred in tote bins from the First Pickle area to a holding area (Curing). The tobacco also undergoes an occasional turning operation (Cure Turning). There are emissions of small amounts of tobacco volatiles (non-ethanol hydrocarbons), as well as ethanol, emitted from the Curing/Cure Turning process.

In the Finishing area a final flavoring solution is applied to the moist snuff received from Curing/Cure Turning. The solution contains ethanol, a VOM, as a carrier for liquid flavorings. Following Finishing the product is transported to the Packing area, where it is placed in cans. Within the Finishing area there are two primary finishing lines, two old backup finishing lines, and two small capacity specialty product lines (Swedish and Happy Days) that are used intermittently. The backup lines are used very infrequently (usually only if the primary lines are not being used).

There are four 24 lb flavor coaters and two 48 lb flavor coaters at the USTM LP Franklin Park Plant. The flavor coaters are mixers that blend a water-based non-VOM liquid flavoring with tobacco that has been previously finished and placed in small portion-sized paper pouches. Heated exhaust air from each coater is treated by air pollution control equipment before it is exhausted to the atmosphere. The tobacco has previously been finished by treatment with flavorings that include edible flavor oils. No ethanol VOM is added to the tobacco prior to, during, or following processing in the flavor coaters. However, the processing occurs under moderate heating, and some VOM is released. Particulate matter is also released from this process.

Wipe cleaning using solvents is performed on machinery throughout plant.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission		Emission
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Unit	Description	Control Equipment
First Pickle and Curing/Cure Turning	Blending of tobacco with liquids	RTO
Finishing	Addition of final flavor solution	RTO

Emission Unit	Description	Emission Control Equipment
24 lb Flavor Coaters (4) 48 lb Flavor Coaters (2)	Addition of special flavorings	Fabric Filter and RTO
Wipe Cleaning	Cleaning of equipment	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected emission units" for the purpose of these unit-specific conditions, are the First Pickle and Curing/Cure Turning area, the Finishing area, the Flavor Coaters, and the Wipe Cleaning.
- b. Each affected emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. Each affected emission unit at the source, except wipe cleaning, is subject to 35 IAC 218 Subpart TT, Other Emission Units.
- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in Condition 7.2.5(b) and the following exception: If no odor nuisance exists the limitation of this condition shall apply only to photochemically reactive material. [35 IAC 218.301]
- e. Each affected emission unit at the source is subject to 35 IAC 212.321, which requires that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in Condition 7.2.3(c)(ii) [35 IAC 212.321(a)].
 - ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected emission units shall not exceed the allowable emission rates specified in the following equation

$$E = A(P)^B$$

Where:

P = Process weight rate; and,
 E = Allowable emission rate; and,

For process weight rates up to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

[35 IAC 212.321(b)]

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the wipe cleaning not being subject to the control requirements of 35 IAC 218.986, because clean-up solvents operations are exempted from the rule. [35 IAC 218.980(b)(1)(B)].

7.2.5 Control Requirements

- a. Every owner or operator of an emission unit subject to 35 IAC 218 Subpart TT shall comply by using emission capture and control equipment which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from each emission unit. [35 IAC 218.986(a)] This is achieved by maintaining the center bed temperature of the RTO at or above 1800°F.
- b. Emissions of organic material in excess of those permitted by Condition 7.2.3(d) are allowed if such emissions are controlled by one of the following methods: [35 IAC 218.302]
 - i. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; or,
 - ii. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere; or,

- iii. Any other air pollution control equipment approved by the Agency and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

7.2.6 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:

Usage of ethanol and emissions of VOM from the combined operation of the first pickle casing cylinders, curing/cure turning, the flavor coaters, and the finishing lines shall not exceed the following limits:

Ethanol Usage		VOM Emissions	
<u>(T/mo)</u>	<u>(T/yr)</u>	<u>(T/mo)</u>	<u>(T/yr)</u>
8.0	87.00	2.54	22.54

These limits are based on maximum usage of ethanol, a maximum uncontrolled emission rate of natural tobacco VOM from the flavor coaters and curing/cure turning of 2.41 tons/mo, and an allowed 81% control efficiency of the RTO. The RTO may be shut down for a period not to exceed 2 days between November and March for maintenance.

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) [T1].

The above limitations were established in Permit 93080108, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.2.7 Testing Requirements

When in the opinion of the Illinois EPA it is necessary to conduct testing to demonstrate compliance with this permit, the owner or operator of a VOM emission unit subject to the requirements of 35 IAC 218 Subpart TT

shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105. [35 IAC 218.988(a)]

7.2.8 Monitoring Requirements

The RTO shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the RTO combustion chamber temperature.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected emission unit to demonstrate compliance with Conditions 5.5.1, 7.2.3, and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Any owner or operator of a VOM emission unit which is subject to the requirements of 35 IAC 218 Subpart TT and complying by the use of emission capture and control equipment shall comply with the following:

On and after the initial start-up date, the owner or operator of a subject VOM source shall collect and record all of the following information each day and maintain the information at the source: [35 IAC 218.991(a)(2)]

- i. Control device monitoring data;
 - ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source;
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. VOM usage in the First Pickle and Curing/Cure Turning operations (T/mo and T/yr), VOM usage in the Finishing operations (T/mo and T/yr), and Plant-wide total VOM usage (T/mo and T/yr)
 - c. Hours of operation of each of the Flavor Coaters (hr/mo and hr/yr)
 - d. Plant-wide usage of wipe cleaning solvents (T/mo and T/yr)

7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected emission unit with the permit requirements, 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.
- b. Any owner or operator of a VOM emission unit which is subject to the requirements of 35 IAC 218 Subpart TT and complying by the use of emission capture and control equipment shall comply with the following:
 - i. The owner or operator of the subject VOM emission unit shall demonstrate to the Illinois EPA that the subject emission unit will be in compliance on and after the initial start-up date by submitting to the Agency all calculations and other supporting data, including descriptions and results of any tests the owner or operator may have performed. [35 IAC 218.991(a)(1)]
 - ii. The owner or operator of a subject VOM emission source shall notify the Illinois EPA of any violation of the requirements of 35 IAC 218 Subpart TT by sending a copy of any record showing a violation to the Illinois EPA within 30 days following the occurrence of the violation. [35 IAC 218.991(a)(3)(A)]

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. VOM emissions from these affected emission units shall be calculated using the following formulas:

$$E_1 = (U_{VOM(C)} + U_{VOM(C)} \times 0.135) \times 0.124$$

$$E_2 = U_{VOM(F)} \times 0.124$$

$$E_3 = (0.4 \times H_{24} + 0.8 \times H_{48})/2000 \times 0.124$$

$$E_4 = U_{solv}$$

$$U_{VOM} = U_{VOM(C)} + U_{VOM(F)}$$

Where:

E_1 = Emissions from First Pickle and Curing/Cure Turning (T/mo or T/yr)

E_2 = Emissions from Finishing (T/mo or T/yr)

E_3 = Emissions from Flavor Coaters (T/mo or T/yr)

E_4 = Emissions from Wipe Cleaning (T/mo or T/yr)

$U_{\text{VOM}(C)}$ = VOM usage in First Pickle and Curing/Cure Turning (T/mo or T/yr)

$U_{\text{VOM}(F)}$ = VOM usage in Finishing (T/mo or T/yr)

U_{VOM} = Plant-wide VOM usage (T/mo or T/yr)

U_{solv} = Solvent usage (T/mo or T/yr)

H_{24} = Combined hours of operation of all four 24 lb coaters (hr/mo or hr/yr)

H_{48} = Combined hours of operation of both 48 lb coaters (hr/mo or hr/yr)

0.135 = Percent of tobacco hydrocarbon emissions based on VOM usage in First Pickle and Curing/Cure Turning

0.4 = Emission factor for 24 lb coaters based on emission test (lb VOM/hr)

0.8 = Emission factor for 48 lb coaters based on twice the factor for the 24 lb coaters (lb VOM/hr)

0.124 = Percent of emissions leaving the RTO based on emission testing (100% capture and 87.6% destruction)

2000 = Conversion factor (lb/T)

- b. Particulate emissions from the Flavor Coaters shall be calculated using the following equation:

$$E = (0.02 \times H_{24} + 0.04 \times H_{48}) / 2000$$

Where:

H_{24} = Combined hours of operation of all four 24 lb
coaters (hr/mo or hr/yr)

H_{48} = Combined hours of operation of both 48 lb
coaters (hr/mo or hr/yr)

0.04 = Emission factor for 48 lb coaters based on
emission test (lb PM/hr)

0.02 = Emission factor for 24 lb coaters based on
half the factor for the 48 lb coaters (lb
VOM/hr)

2000 = Conversion factor (lb/T)

- c. Compliance with the particulate matter limitations in
this section is assured and achieved by the proper
operation and maintenance of filters and the inherent
operation of the affected emission units.

7.3 Natural Gas-Fired Combustion Sources

7.3.1 Description

The boilers combust natural gas to produce steam for heating and processes.

The Regenerative Thermal Oxidizer is a control device for VOM emissions. It has a preheat burner and a natural gas injector. The injector is to keep the bed temperature at desired levels.

7.3.2 List of emission equipment and pollution control equipment

Emission Unit	Description	Emission Control
300 HP Boilers Boiler 1 Boiler 2	12.554 mmBtu/Hr Gas Fired 12.554 mmBtu/Hr Gas Fired	None
250 HP Boilers Boiler 5 Boiler 6	9.5 mmBtu/Hr Gas Fired 9.5 mmBtu/Hr Gas Fired	None
150 HP Boilers Boiler 3 Boiler 4	6.277 mmBtu/Hr Gas Fired 6.277 mmBtu/Hr Gas Fired	None
RTO Preheat burner NG injector	6.0 mmBtu/Hr Gas Fired 4.8 mmBtu/Hr Gas Fired	None

7.3.3 Applicable Regulations

- a. The "affected fuel combustion emission unit" for the purpose of these unit-specific conditions, is each piece of equipment listed in condition 7.3.2.
- b. Each affected emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. The emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.3.4 Non-Applicability of Regulations of Concern

- a. The New Source Performance Standard for Small - Industrial - Commercial - Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to each steam generating unit for which construction, modification, or reconstruction is commenced after

June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 mmBtu/hr) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr). The 300 HP Boilers commenced constructed prior to June 9, 1989 and all other fuel combustion emission units have a maximum design heat input capacity less than 10 mmBtu/hr.

- b. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, "Use of Organic Material".
- c. The affected fuel combustion emission units are not subject to 35 IAC 217.121, New Emission Sources, since the actual heat input of the fuel combustion emission units is less than 73.2 MW (250 mmBtu/hr).

7.3.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel burned in the fuel combustion emission units.

7.3.6 Emission Limitations

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

<u>Equipment</u>	<u>Firing Rate (mmBtu/hr)</u>	<u>Emissions</u>			
		<u>NO_x (lb/hr)</u>	<u>(T/yr)</u>	<u>CO (lb/hr)</u>	<u>(T/yr)</u>
Boiler 1	12.554	1.76	7.70	0.44	1.92
Boiler 2	12.554	1.76	7.70	0.44	1.92
Boiler 3	6.277	0.63	2.75	0.13	0.55
Boiler 4	6.277	0.63	2.75	0.13	0.55
Boiler 5	9.500	0.95	4.16	0.19	0.83
Boiler 6	9.500	0.95	4.16	0.19	0.83

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) [T1].

The above limitations were established in Permit 93080108, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items which allow to demonstrate compliance with Condition 5.5.1 and 7.3.5 pursuant to Section 39.5 (7) (b) of the Act:

- a. Total natural gas usage for the fuel combustion emission units (mmcf/year)
- b. Annual aggregate NO_x, CO, PM, SO₂, and VOM emissions from the boilers, based on fuel consumption and the applicable emission factors, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements within 30 days pursuant to Section 39.5 (7) (f) (ii) of the Act.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance provisions addressing Condition 7.3.3(b) are not set by this permit as compliance is assumed to be achieved by the normal work practices and maintenance activities inherent in operation of these natural gas fired fuel combustion emission units.
- b. Compliance with the emission limits in condition 5.5 shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/10⁶ ft³)</u>
NO _x	100.0

PM	7.6
SO ₂	0.6
VOM	5.5
CO	84

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (<100 mmBtu/hr), Tables 1.4.1 and 1.4.2, AP-42, Volume I, 5th Edition, March 1998 Revision.

Boiler emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

7.4 Standby Emergency Diesel Engine - Generator

7.4.1 Description

No. 2 diesel fuel oil diesel engine-generator (2,818 hp) used to supply emergency power to facility.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Generator	Compression Ignition Diesel Engine (18.34 mmBtu) and Generator Set	None

7.4.3 Applicable Regulations

- a. The "affected engine" for the purpose of these unit-specific conditions, is the piece of equipment listed in condition 7.4.2.
- b. Each affected emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hr (8 lb/hr) from any affected engine, except as provided in Condition 7.4.5(b) and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].
- d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any affected engine with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively, to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input (0.3 lbs/mmBtu) when distillate fuel oil is burned. [35 IAC 214.122(b)(2) and 214.304]
- e. Startup Provisions

The Permittee is authorized to operate an affected engine in violation of the applicable limit of Condition 5.2.2(c) during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

- i. This authorization only extends for a period of up to two-hours following initial firing of fuel during each startup event.
- ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups and minimize the frequency of startups:
 - A. Implementation of established startup procedures, including preheating an engine prior to startup when sufficient time is available; and
 - B. Operating the engine as peaking unit.
- iii. The Permittee shall fulfill applicable recordkeeping and reporting requirements of Condition 7.4.9(e) and 7.4.10(d).

7.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected engine not being subject to the requirements of 35 IAC 212.321 or 212.322 because due to the unique nature of these units, a process weight rate weight cannot be set so that such rules cannot reasonably be applied.
- b. This permit is issued based on the affected engine not being subject to the control requirements of 35 IAC 218 Subpart TT, because fuel combustion units are exempted. [35 IAC 218.980(f)]

7.4.5 Operational and Production Limits, Work Practices, and Control Requirements

- a. No. 2 diesel fuel shall be the only fuel used in the engine.
- b. Emissions of organic material in excess of those permitted by Condition 7.4.3(c) are allowed if such emissions are controlled by one of the following methods: [35 IAC 218.302]
 - i. Flame, thermal or catalytic incineration so as either to reduce such emissions to 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; or,

- ii. A vapor recovery system which adsorbs and/or condenses at least 85 percent of the total uncontrolled organic material that would otherwise be emitted to the atmosphere; or,
- iii. Any other air pollution control equipment approved by the Agency and approved by the USEPA as a SIP revision capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

7.4.6 Emission Limitations

The affected engine is subject to the following emission limitations:

Operating hours shall not exceed 288 hours per year. Emissions of NO_x, CO, SO₂, PM-10, and VOM shall not exceed 3.94, 0.81, 0.792, 0.26, and 0.24 tons per year, respectively.

These limits are based on emission factors from the engine manufacturer, except for SO₂ which came from AP-42, 10/96 Section 3.4.

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) [T1].

The above limitations were established in Permit 99100083, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.4.7 Testing Requirements

- a. Within 45 days of a written request by the Illinois EPA, the Permittee shall have the opacity of the engine determined by a certified observer in accordance with USEPA Test Method 9 during representative operating conditions of the engine as specified by the Illinois EPA. Illinois EPA may require such observations if, based on its observations, the opacity of the engine does not comply with 35 IAC 212.123, or engine is poorly maintained or operated so as to make compliance with 35 IAC 212.123.
- b. i. The Permittee shall notify the Illinois EPA at least 15 days in advance of the date and time of observations, in order to allow the Illinois EPA to witness the observations. This notification shall include the name and employer of the certified observer(s) and identify any concerns for successful completion of observations, i.e., lack of suitable point for proper observation or

inability to conduct observations under specified conditions.

- ii. The Permittee shall promptly notify the Illinois EPA of any changes in the date and time of observation.
 - iii. The Permittee shall provide a copy of its observers readings to the Illinois EPA at the time of observations, if Illinois EPA personnel are present at the conclusion of observations.
- c. The Permittee shall submit a written report for these observations within 15 days of the date of observation. Pursuant to Section 39.5(7)(e) of the Act, this report shall include:
- i. The date, place, and time of sampling or measurements
 - ii. The company or entity that performed the analysis.
 - iii. The analytical techniques or methods used.
 - iv. The operating conditions as existing at the time of sampling or measurement.
 - v. The results of such analyses.

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the generator to demonstrate compliance with 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Annual aggregate NO_x, CO, PM, SO₂, and VOM emissions from the generator, based on hours of operation and the applicable emission factors, with supporting calculations.
- b. Total hours of operation per year for the generator based on the current month's records plus the preceding 11 months.

- c. The maximum sulfur content of distillate fuel oil that may be burned in the engine and comply with Conditions 7.4.3(d) and 7.4.6, with supporting calculations.
- d. Operation of an engine with an oil in excess of this sulfur content, as determined from the records, with date duration, sulfur content of oil, and explanation.
- e. Records for each startup of the generator, that, as a minimum, shall include:
 - i. Date and type of startup, i.e., exercise of generator or startup to generate electricity.
 - ii. Duration of the startup, i.e. start time and time startup discontinued or normal operation achieved, i.e., stable operation at load.
 - iii. The nature of opacity, i.e., severity and duration, during the startup and the nature of opacity at the conclusion of startup, if above normal.
 - iv. Whether exceedance of Condition 5.2.2(c) may have occurred during startup, with explanation and estimated duration (minutes).
 - v. For startup to generate electricity: If normal operation was not achieved within 1 hour, an explanation why startup could not be achieved in one hour; a detailed description of the startup, including reason for operation and whether preheat or reduced loading was performed; and explanation why preheat, reduced loading, and other established startup procedures could not be performed, if not performed.
- f. A maintenance and repair log for the generator, listing each activity performed with date.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of non-compliance with the operating requirements and emissions of VOM as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. The total emissions of NO_x, PM, CO, SO₂, VOM from the generator in excess of the limits specified in Condition 7.4.6 and calculated by using emission

factors and equation from Condition 7.4.12 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

- b. The total hours of operation per year of the affected engine in excess of the limits specified in Condition 7.4.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.
- c. Burning of fuel in the affected engine that may not have been in compliance with the limitations of Condition 7.4.3(d) or 7.4.6, as determined from the records required by Condition 7.4.9(c), with a copy of such record for each incident within 30 days of such an occurrence.
- d. Reporting for Startups of Engine

The Permittee shall provide an annual report, submitted with the Annual Emission Report, to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to Section 39.5(7)(b) of the Act, concerning startup of engine. At a minimum, this report shall include:

- i. For the engine, the total number of startups to generate electricity and the total number of such startups that may have resulted in opacity in excess of Condition 5.2.2(c).
- ii. For the engine, the estimated duration of excess opacity during startup, minutes/year.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3(c) is assumed to be achieved by the work-practices inherent in the operation of No. 2 diesel fuel engines, so that no compliance procedures are set in this permit addressing this regulation.
- b. Compliance with Condition 7.4.3(d) is assumed to be achieved by burning No. 2 diesel fuel with a sulfur content equal to or less than 0.3% in the affected engine

- c. Compliance with the emission limits in Condition 7.4.6 shall be based on the recordkeeping requirements in Condition 7.4.9 and calculated based on the emission factors and formulas listed below:

Emission Factors*	
<u>Pollutant</u>	<u>(g/hp-hr)</u>
PM-10	0.29
NO _x	4.4
SO ₂	0.886
VOM	0.26
CO	0.9

* Emission factors provided by manufacturer except SO₂ which comes from AP-42, 10/96, Section 3.4 based on sulfur content of fuel oil of 0.3%

Engine Emissions (lb) = Rated Power Output in hp x
Appropriate Emission Factor x Total Annual Operating
Hours x 0.002204623 lb/g

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 **September 9, 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
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
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)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- 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 authorized by this permit; 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 authorized by this permit.

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 annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- 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 - 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: _____

YY:jar