

DRAFT/PROPOSED CAAPP PERMIT
January 23, 2012

Attention:

The Gillette Company/P&G, North Chicago Plant
Attn: Mark Kuklinski, HS&E Coordinator
3500 West 16th Street
North Chicago, Illinois 60064

State of Illinois

CLEAN AIR ACT PERMIT
PROGRAM (CAAPP) PERMIT

[Title I and Title V Permit]

Source:

The Gillette Company/P&G, North Chicago Plant
3500 West 16th Street
North Chicago, Illinois 60064

I.D. No.: 097125AAM
Permit No.: 96010012

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

[Title I and Title V Permit]

Type of Application: Renewal
Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 097125AAM
Permit No.: 96010012
Statement of Basis No.: 96010012-1108

Date Application Received: November 21, 2005
Date Issued: TBD

Expiration Date: TBD
Renewal Submittal Date: 9 Months Prior to TBD

Source Name: The Gillette Company/P&G, North Chicago Plant
Address: 3500 West 16th Street
City: North Chicago
County: Lake
ZIP Code: 60064

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Bruce Beazly at 217/785-1705.

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

ECB:MTR:BDB:psj

cc: IEPA, Permit Section
IEPA, FOS, Region 1

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Section 1 - Source Information

1. Addresses

Source

The Gillette Company/P&G,
North Chicago Plant
3500 West 16th Street
North Chicago, Illinois 60064

Owner

The Gillette Company
One P&G Plaza
Cincinnati, Ohio 45202

Operator

The Gillette Company/P&G,
North Chicago Plant
3500 West 16th Street
North Chicago, Illinois 60064

Permittee

The owner or operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Darrell Parks	Plant Manager
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Mark Kuklinski	847/936-4642	Kuklinski.ma@pg.com
<i>Technical Contact</i>	Mark Kuklinski	847/936-4642	Kuklinski.ma@pg.com
<i>Correspondence</i>	Mark Kuklinski	847/936-4642	Kuklinski.ma@pg.com
<i>Billing</i>	Mark Kuklinski	847/936-4642	Kuklinski.ma@pg.com

3. Single Source

The source shall be defined to include all the following source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

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Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No owner or operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the owner or operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 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.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

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upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source 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, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source 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]

c. Duty to Maintain Equipment

The source 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. [Section 39.5(7)(a) of the Act]

d. 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 there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA 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]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

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- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. 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.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall 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 the owner or operator of the 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 Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source 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]

4. Testing

- a. 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

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any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 6.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. Testing by Owner or Operator: The IEPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

b. Retention of Records

- i. 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]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee

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shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by including the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. 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.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6.

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source 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 IEPA, 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 _____ (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA

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may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, 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]

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b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA 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 source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. 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]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the 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.

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This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Illinois Environmental Protection Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, 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 toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.

- ii. Compliance Method

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the Illinois EPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Emissions Reduction Market System (ERMS)

Pursuant to 35 IAC Part 205, ERMS seasonal emissions of VOM during the seasonal allotment period from May 1 through September 30 shall not exceed 15 tons, not including VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit. The Permittee shall comply with all Applicable Requirements in Section 7.2 of this permit.

c. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR Subpart B, Servicing of Motor Vehicle Air Conditioners.

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- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

d. Asbestos Demolition and Renovation

- i. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- ii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

e. Future Emission Standards

- i. Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit.
- ii. The Permittee 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 Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. <u>Applicable Plans and Programs</u>
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Pursuant to 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Illinois Environmental Protection Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities) at the source.

a. Fugitive PM Operating Program

- i. Pursuant to 35 IAC 212.309, this source shall be operated under the provisions of Fugitive PM Operating Program prepared by the Permittee and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). The Permittee shall comply with the Fugitive PM Operating Program and any amendments to the Fugitive PM Operating Program submitted pursuant to Condition 3.2(a)(ii). As a minimum, the Fugitive PM Operating Program shall include provisions identified in 35 IAC 212.310(a) through (g) and the following:
 - A. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212.304 through 212.308.
 - B. Estimated frequency of application of dust suppressants by location.
 - C. Such other information as may be necessary to facilitate the IEPA's review of the Fugitive PM Operating Program.
- ii. Pursuant to 35 IAC 212.312, the Fugitive PM Operating Program shall be amended from time to time by the Permittee so that the Fugitive PM Operating Program is current. Such amendments shall be consistent with the requirements set forth by this Condition 3.2(a) and shall be submitted to the IEPA within 30 days of such amendment. Any future revision to the Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Fugitive PM Operating Program,

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the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

- iii. The Fugitive PM Operating Program, as submitted by the Permittee on December 23, 1983, is incorporated herein by reference. The document constitutes the formal Fugitive PM Operating Program required under 35 IAC 212.310, addressing the control of fugitive particulate matter emissions from all plant roadways, and other subject operations located at the facility that are subject to 35 IAC 212.309.
- iv. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Fugitive PM Operating Program, any amendments or revisions to the Fugitive PM Operating Program (as required by Condition 3.2(a)), and the Permittee shall also keep a record of activities completed according to the Fugitive PM Operating Program.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Episode Action Plan

Should this source become subject to 35 IAC 244.142, the Permittee shall prepare, submit, and operate under an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures and submitted to the IEPA for its review. The Episode Action Plan shall contain the information specified in 35 IAC 244.144. The Permittee shall immediately implement the appropriate steps described in this Episode Action Plan should an air pollution alert or emergency be declared. Any future Episode Action Plan made by the Permittee during the permit term is automatically incorporated by reference provided the Episode Action Plan is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Episode Action Plan. In the event that the IEPA notifies the Permittee of a deficiency with any Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to 39.5(7)(a) of the Illinois Environmental Protection Act.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit 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, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this section.

4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

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5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Illinois Environmental Protection Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 3.1(a)(i), 3.1(b), and 3.1(e).
 - II. Requirements in Condition 3.2(a).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report.

b. Semiannual Reporting

- i. The Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit. Addresses are included in Attachment 3.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

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Section 4 - Emission Unit Requirements

4.1 Organic Chemical Manufacturing Processes Requiring VOM Control

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Resin Reactor No.3 (RX_1531)	PM, VOM	Prior to 1975	N/A	Condenser (PCD_1531)	None

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of Resin Reactor 3 and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with Test Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), 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 which, either alone or in combination with the emission of particulate matter from all other similar process emission units

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Section 4 - Emission Unit Requirements
4.1 - Organic Chemical Manufacturing
Processes Requiring VOM Control

for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a).

ii. Compliance Method (PM Requirements)

Recordkeeping Requirements

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the maximum hourly PM emissions from the chemical manufacturing process with supporting calculations (lb/hour).

c. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, and 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.
- B. Pursuant to 35 IAC 218.966(a), every owner or operator of a miscellaneous organic chemical manufacturing process emission unit subject to 35 IAC Subpart RR shall employ emission capture and control techniques which achieve an overall reduction in uncontrolled VOM emissions of at least 81 percent from the chemical manufacturing process.
- C. Pursuant to 35 IAC 218.966(d), no limits under 35 IAC 218 Subpart RR (Condition 4.1.2(c)(i)(B)) shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 1.0 ton per calendar year if the total emissions from such emission units not complying with 35 IAC 218.966 does not exceed 5.0 tons per calendar year.
- D. Pursuant to Permit 73110008, VOM emissions from Resin Reactor 3 shall not exceed 0.47 tons/month and 4.5 tons/year. 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]

ii. Compliance Method (VOM Requirements)

Testing Requirements

- A. 1. Pursuant to 35 IAC 218.968(a), the Permittee shall conduct testing to demonstrate compliance with 35 IAC 218.966(a) within 180 days of resuming use of Resin Reactor 3.
2. Pursuant to Section 39.5(7)(b) and 39.7(d) of the Act, as an alternative to the testing required in Condition 4.1.2(c)(ii)(A)(1) above, the Permittee shall conduct testing to demonstrate compliance with 35 IAC 218.966(d) within 180 days of resuming use of Resin Reactor 3 without the use of the Condenser (PCD_1531).
- B. The owner or operator of a VOM emission unit subject to 35 IAC 218 Subpart RR shall, at his own expense, conduct such tests in accordance with the applicable test methods and procedures specified in 35 IAC 218.105. See also Conditions 2.4 and 7.1.

Monitoring Requirements

- B. Pursuant to Section 39.5(7)(b) of the Act, when the condenser is in operation, the Permittee shall monitor on a daily basis the condenser outlet temperature to ensure that it is less than the specified maximum temperature

of 92.3°F/33.5°C or the maximum temperature determined from the most recent test required by Condition 4.1.2(c)(ii)(A)(1).

Recordkeeping Requirements

- C. Pursuant to 35 IAC 218.991(a)(2), when the condenser is in operation, the owner or operator shall collect and record all of the following information each day:
 - 1. Control device monitoring data.
 - 2. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source.
 - 3. 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.
- D. Pursuant to Section 39.5(7)(b) of the Act, when the condenser is in operation, the Permittee shall:
 - 1. Maintain records demonstrating the condenser outlet temperature is kept below the temperature determined from the most recent test required by Condition 4.1.2(c)(ii)(A)(1) that is necessary to maintain at least 81% VOM control.
 - 2. Maintain records of the maximum hourly VOM emissions from the Resin Reactor 3 with supporting calculations (lb/hour).
 - 3. Maintain records of the monthly and annual emissions of VOM from the Resin Reactor 3 with supporting calculations (ton/month and tons/year).
- E. Pursuant to Section 39.5(7)(b) of the Act, when the condenser is not in operation, the Permittee shall:
 - 1. Maintain records of the VOM emissions per batch as determined from the most recent test required by Condition 4.1.2(c)(ii)(A)(2).
 - 2. Maintain records of the number of batches (batches/day and batches/month).
 - 3. Maintain records of the monthly and annual emissions of VOM from the Resin Reactor 3 with supporting calculations (ton/month and tons/year).

d. i. Operational and Production Requirements

- A. Pursuant to Construction Permit 73110008, the operating rate of Resin Reactor 3 shall not exceed 2.02 ton/batch, 60 batches/month, and 575 batches/year. 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]
- B. Pursuant to 35 IAC 218.966(c), any leaks from components shall be subject to the following control measures:
 - 1. Repair any component from which a leak of VOL can be observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found, unless the leaking component cannot be

repaired until the process unit is shut down, in which case the leaking component must be repaired before the unit is restarted.

ii. Compliance Method (Operational and Production Requirements)

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain production records for Resin Reactor 3 as follows: tons/batch, batches/month and batches/year, tons/month and tons/year.
- B. For any leak which cannot be readily repaired within one hour after detection, the following records shall be kept:
 - 1. The name and identification of the leaking component.
 - 2. The date and time the leak is detected.
 - 3. The action taken to repair the leak.
 - 4. The date and time the leak is repaired.

e. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate Resin Reactor 3 and associated control equipment in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring Requirements

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform quarterly annual inspections of Resin Reactor 3 and associated control equipment.

Recordkeeping Requirements

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log of Resin Reactor 1 and associated control equipment. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The chemical manufacturing process is not subject to 35 IAC 218 Subpart V, because the source does not meet the applicability criteria in 35 IAC 218.500.
- b. The chemical manufacturing process is not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subparts VV, III, NNN, and RRR, for SOCM processes and leaks, because the chemical manufacturing process does not produce, as an intermediate or primary product, one or more of the chemicals listed in 40 CFR 60.489, and do not produce as a product, co-product, or intermediate any of the chemicals listed in 40 CFR 60.617, 60.667, or 60.707.
- c. The chemical manufacturing process is not subject to the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart DDD, for polymer manufacturing because the chemical manufacturing process does not manufacture any of the materials affected by this subpart.

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- d. The chemical manufacturing process is not subject to 40 CFR Part 63, Subparts F through I, for SOCOMI processes and leaks, because the chemical manufacturing process does not produce as a primary product, one of the chemicals listed in Table 1 of 40 CFR 63, Subpart F.
- e. The chemical manufacturing process is not subject to 40 CFR Part 63, Subparts U, W, JJJ, and OOO, for polymer and resin manufacturing because the chemical manufacturing process does not manufacture any of the materials affected by these subparts.
- f. The chemical manufacturing process is not subject to 40 CFR Part 63, Subpart VVVVVV, for Chemical Manufacturing Area Sources because the chemical manufacturing process does not process, use, or produce any of the subject HAPs of the subpart.
- g. The chemical manufacturing process is not subject to 40 CFR Part 63, Subpart BBBBBBB, for Area Source Standard for Chemical Preparations Industry because the chemical manufacturing process does not process, use, or produce any of the target HAPs of the subpart.
- h. The chemical manufacturing process is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the chemical manufacturing process does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), 4.1.2(c)(i), 4.1.2(d)(i), and 4.1.2(e)(i).
 - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

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b. Other Reporting

- i. Pursuant 35 IAC 218.991(a)(3)(A), the owner or operator shall notify the IEPA of any violation of the requirements of 35 IAC 218 Subpart RR by sending a copy of any record showing a violation to the IEPA, Compliance Section, within 30 days following the occurrence of the violation.

4.2 Organic Chemical Manufacturing Processes Not Requiring VOM Control

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
GAP Plant (PLNT_901)	VOM, PM	1995	N/A	None	None
Blending Vessel (RX_1521)	VOM, PM,	Prior to 1975	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of Blending Vessel (RX_1521) and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), 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 which, 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 35 IAC 212.321(c). See Condition 7.2(a)

ii. Compliance Method (PM Requirements)

Recordkeeping Requirements

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the maximum hourly PM emissions from each chemical manufacturing process with supporting calculations (lb/hour).

c. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, and 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

- B. I. Pursuant to CAAPP Permit 96010012, VOM emissions from the GAP plant shall not exceed 166 lb/month and 1.0 ton/year. 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]
- II. Pursuant to Construction Permit 11010023, VOM emissions from Blending Vessel RX_1521 shall not exceed 1.0 tons/year. 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]

ii. Compliance Method (VOM Requirements)

Recordkeeping Requirements

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the maximum hourly VOM emissions from each chemical manufacturing process with supporting calculations (lb/hour).
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the monthly and annual emissions of VOM from each chemical manufacturing process with supporting calculations (lb/month and tons/year).

d. i. Operational or Production Requirements

- A. Pursuant to CAAPP Permit 96010012, the production rate of the GAP plant shall not exceed 555 ton/month and 6,658 ton/year. 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]

ii. Compliance Method (Operational or Production Requirements)

Recordkeeping Requirements

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the production rate for the Gap plant in tons/month and tons/year.

e. i. Work Practice Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the chemical manufacturing process in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform quarterly inspections of the chemical manufacturing process.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The chemical manufacturing processes are not subject to 35 IAC 218 Subpart V, because the source does not meet the applicability criteria in 35 IAC 218.500.
- b. Pursuant to 35 IAC 218.980(d), the chemical manufacturing processes are not subject to the control requirements of 35 IAC 218.966 because no limits under 35 IAC 218 Subpart RR shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 1.0 ton per calendar year if the total emissions from such emission units not complying with 35 IAC 218.966 does not exceed 5.0 tons per calendar year.
- c. The chemical manufacturing processes are not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subparts VV, III, NNN, and RRR, for SOCOMI processes and leaks, because the chemical manufacturing processes do not produce, as an intermediate or primary product, one or more of the chemicals listed in 40 CFR 60.489, and do not produce as a product, co-product, or intermediate any of the chemicals listed in 40 CFR 60.617, 60.667, or 60.707.
- d. The chemical manufacturing processes are not subject to the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart DDD, for polymer manufacturing because the chemical manufacturing processes do not manufacture any of the materials affected by this subpart.
- e. The chemical manufacturing processes are not subject to 40 CFR Part 63, Subparts F through I, for SOCOMI processes and leaks, because the chemical manufacturing processes do not produce as a primary product, one of the chemicals listed in Table 1 of 40 CFR 63, Subpart F.
- f. The chemical manufacturing processes are not subject to 40 CFR Part 63, Subparts U, W, JJJ, and OOO, for polymer and resin manufacturing because the chemical manufacturing processes do not manufacture any of the materials affected by these subparts.
- g. The chemical manufacturing process is not subject to 40 CFR Part 63, Subpart VVVVVV, for Chemical Manufacturing Area Sources because the chemical manufacturing process does not process, use, or produce any of the subject HAPs of the subpart.

- h. The chemical manufacturing process is not subject to 40 CFR Part 63, Subpart BBBBBBB, for Area Source Standard for Chemical Preparations Industry because the chemical manufacturing process does not process, use, or produce any of the target HAPs of the subpart.
- i. The chemical manufacturing processes are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the chemical manufacturing processes do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Illinois Environmental Protection Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), and 4.2.2(f)(i).
 - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.3 Inorganic Chemical Manufacturing Processes

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Powdered inorganic salt manufacturing (PLNT_601)	PM, VOM	Prior to 1980	N/A	Venturi dust scrubber and separator (PCD_601)	None
Batch Oxidation Reactor (RX_301)	PM, HCl	Prior to 1980	N/A	Venturi Scrubber (PCD_350)	None
Acid-base reaction or blending (RX_201)	PM, HCl	1/1983	N/A	None	None
Inorganic acid salts reactor (RX_101)	PM, HCl	2/1989	N/A	Venturi Scrubber (PCD_350)	None
Acid-Base reaction or blending (RX_202)	PM, HCl	4/2003	N/A	None	None
Acid-Base reaction or blending (RX_302)	PM, HCl	10/2003	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit in 4.3.1 in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

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C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), 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 which, 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 35 IAC 212.321(c). See Condition 7.2(a).

B. Pursuant to this CAAPP Permit 96010012 and Construction Permits 74080142, 80120010, 99100024, 03040010, and 03100055; combined PM emissions from chemical manufacturing processes RX_101, RX_201, RX_301, RX_202, and RX_302 shall not exceed 12.22 lb/hour and 10.62 ton/year. 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). [T1R]

B. Pursuant to previously issued CAAPP Permit 96010012 and Construction Permits 74080142, 80120010, and 99100024; PM emissions from chemical manufacturing processes PLNT_601 shall not exceed 10.0 ton/year. 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]

ii. Compliance Method (PM Requirements)

Recordkeeping Requirements

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the maximum hourly PM emissions from each chemical manufacturing process with supporting calculations (lb/hour).

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the monthly and annual emissions of PM from each of the chemical manufacturing processes RX_101, RX_201, RX_301, RX_202, and RX_302 with supporting calculations (lb/month and tons/year) and the combined total PM emissions (tons/month and tons/year).

c. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, and 218.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material.

B. Pursuant to Construction Permit 83110056, VOM emissions from PLNT_601 shall not exceed 0.77 tons/month and 2.0 tons/year. 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]

ii. Compliance Method (VOM Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the maximum hourly VOM emissions from each chemical manufacturing process with supporting calculations (lb/hour).
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the monthly and annual emissions of VOM from chemical manufacturing process PLNT_601 with supporting calculations (tons/month and tons/year).

d. i. Hazardous Air Pollutant Requirements (HAP)

- A. Pursuant to this CAAPP Permit 96010012 and Construction Permits 74080142, 80120010, 99100024, 03040010, and 03100055; HCl emissions from chemical manufacturing processes RX_101, RX_201, RX_301, RX_202, and RX_302 shall not exceed 3.99 ton/year combined. 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). [T1R]

ii. Compliance Method (HAP Requirements)

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the monthly and annual emissions of HCl from chemical manufacturing processes RX_101, RX_201, RX_301, RX_202, and RX_302 with supporting calculations (tons/year).

e. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the chemical manufacturing processes including associated control equipment in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring Requirements

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of the chemical manufacturing processes.

Recordkeeping Requirements

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The chemical manufacturing processes are not subject to 35 IAC 218 Subpart V, because the source does not meet the applicability criteria in 35 IAC 218.500.
- b. Pursuant to 35 IAC 218.980(d), the chemical manufacturing processes are not subject to the control requirements of 35 IAC 218.966 because no limits under 35 IAC 218 Subpart RR

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shall apply to emission units with emissions of VOM to the atmosphere less than or equal to 1.0 ton per calendar year if the total emissions from such emission units not complying with 35 IAC 218.966 does not exceed 5.0 tons per calendar year.

- c. The chemical manufacturing processes are not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subparts VV, III, NNN, and RRR, for SOCOMI processes and leaks, because the chemical manufacturing processes do not produce, as an intermediate or primary product, one or more of the chemicals listed in 40 CFR 60.489, and do not produce as a product, co-product, or intermediate any of the chemicals listed in 40 CFR 60.617, 60.667, or 60.707.
- d. The chemical manufacturing processes are not subject to the New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart DDD, for polymer manufacturing because the chemical manufacturing processes do not manufacture any of the materials affected by this subpart.
- e. The chemical manufacturing processes are not subject to 40 CFR Part 63, Subparts F through I, for SOCOMI processes and leaks, because the chemical manufacturing processes do not produce as a primary product, one of the chemicals listed in Table 1 of 40 CFR 63, Subpart F.
- f. The chemical manufacturing processes are not subject to 40 CFR Part 63, Subparts U, W, JJJ, and OOO, for polymer and resin manufacturing because the chemical manufacturing processes do not manufacture any of the materials affected by these subparts.
- g. The chemical manufacturing process is not subject to 40 CFR Part 63, Subpart VVVVVV, for Chemical Manufacturing Area Sources because the chemical manufacturing process does not process, use, or produce any of the subject HAPs of the subpart.
- h. The chemical manufacturing process is not subject to 40 CFR Part 63, Subpart BBBBBBB, for Area Source Standard for Chemical Preparations Industry because the chemical manufacturing process does not process, use, or produce any of the target HAPs (metal compounds of chromium, lead, manganese and nickel) of the subpart.
- i. The chemical manufacturing processes are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the chemical manufacturing processes do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included for the chemical manufacturing processes.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Illinois Environmental Protection Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 4.3.2(a), 4.3.2(b), 4.3.2(c), 4.3.2(d), and 4.3.2(e).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

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- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.4 Fuel Combustion Equipment

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Industrial natural gas fired boiler 14.7 mmBtu/hr (BO_1)	NO _x , CO	1995	N/A	None	None
Industrial natural gas fired boiler 14.7 mmBtu/hr (BO_2)	NO _x , CO	1995	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the affected boiler and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Nitrogen Oxide Requirements (NO_x)

A. Pursuant to CAAPP Permit 96010012, NO_x emissions from each boiler shall not exceed 2.0 lb/hr and 9.0 ton/year. 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]

ii. Compliance Method (NO_x Requirements)

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the monthly and annual emissions of NO_x from each boiler with supporting calculations (tons/month and tons/year).

c. i. Carbon Monoxide Requirements (CO)

A. Pursuant to 35 IAC 216.121, no person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmbtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

B. Pursuant to previously issued CAAPP Permit 96010012 and Construction Permit 95010022, CO emissions from each boiler shall not exceed 1.23 lb/hr and 5.41 ton/year. 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]

ii. Compliance Method (CO Requirements)

Recordkeeping Requirements

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the monthly and annual emissions of CO from each boiler with supporting calculations (tons/month and tons/year).

d. i. New Source Performance Standards Requirements (NSPS)

A. Pursuant 40 CFR 60.40c(a), the boilers are subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60 Subparts A and Dc, because the boilers were constructed after June 9, 1989 and have 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).

ii. Compliance Method (NSPS Requirements)

Recordkeeping Requirements

A. Pursuant to 40 CFR 60.48c(g)(2), the owner or operator of the boilers shall record and maintain records of the amount of each fuel combusted during each calendar month.

e. i. Operational and Production Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the boilers.

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping Requirements

A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the type of fuel fired in the boilers.

f. i. Work Practice Requirements

A. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform monthly inspections of each boiler.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The boilers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR Part 63 Subpart JJJJJJ, because the boilers are gas-fired pursuant to 40 CFR 63.11195(e).
- b. The boilers are not subject to 35 IAC 212.206 and 35 IAC 214.161 because the boilers use natural gas exclusively.
- c. Pursuant to 35 IAC 215.303, the provisions of 35 IAC 215.301 and 215.302 shall not apply to fuel combustion emission sources.
- d. The boilers are not subject to 35 IAC 217.141 because the heat input of the boilers are less than 250 mmBtu/hr.
- e. The boilers are not subject to 35 IAC 217 Subparts D, E, F, G, H, I, and M, because the boilers are not located in any of the areas listed in 35 IAC 217.150(a)(1)(A).
- f. The boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the boiler does not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Illinois Environmental Protection Act.

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a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), 4.4.2(c)(i), 4.4.2(d)(i), 4.4.2(e)(i), and 4.4.2(f)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.5 Storage Tank

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
11,183 gallon fixed roof aboveground hydrochloric acid storage tank (STK_1413)	N/A	Prior to 1980	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.5.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring Requirements

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity while the tank is being filled in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of tank STK_1413 and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with Test Method 9.

b. i. Work Practice Requirements

A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the tank in a manner consistent with safety and good air pollution control practice for minimizing emissions.

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ii. Compliance Method (Work Practice Requirements)

Monitoring Requirements

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform annual inspections of the tank.

Recordkeeping Requirements

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. Pursuant to 40 CFR 60.110b, the tanks are not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR Part 60, Subpart Kb, because the tanks are less than 75 cubic meters (19,813 gallons).
- b. The tank is not subject to 35 IAC 218, because the tank does not store any liquid considered an organic material as defined in 35 IAC 211.4250(b).
- c. The tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the tanks do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Illinois Environmental Protection Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the Illinois EPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
- I. Requirements in Condition 4.5.2(a)(i), and 4.5.2(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the Illinois EPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.

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- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

4.6 Bulk Powder Loading

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Bulk powder loading operation	PM	5/2008	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.6.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the bulk powder loading operation and/or maintenance and repair. If corrective action was taken the Permittee shall perform a follow-up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping Requirements

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

A. Pursuant to 35 IAC 212.321(a), 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 which, 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 35 IAC 212.321(c). See Condition 7.2(a)

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- B. Pursuant to Construction Permit 08020024, PM emissions from the bulk powder loading operation shall not exceed 0.1 ton/month and 1.0 ton/year. 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]

ii. Compliance Method (PM Requirements)

Recordkeeping Requirements

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the maximum hourly PM emissions from the bulk powder loading operation with supporting calculations (lb/hour).
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the monthly and annual emissions of PM from the bulk powder loading operation with supporting calculations (tons/month and tons/year).

c. i. Operational or Production Requirements

- A. Pursuant to Construction Permit 08020024, material throughput of the bulk powder loading operation shall not exceed 1,250,000 ton/month and 12,500,000 ton/year. 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]

ii. Compliance Method (Operational or Production Requirements)

Recordkeeping Requirements

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the material throughput (tons/month and tons/year).

d. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate the bulk powder loading operation in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring Requirements

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform annual inspections for proper operation and condition of the equipment of the bulk powder loading operation.

Recordkeeping Requirements

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

3. Non-Applicability Determinations

- a. The bulk powder loading operation is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the bulk powder loading operation does not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.6.2(a)(i), 4.6.2(b)(i), 4.6.2(c)(i), and 4.6.2(d)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

Section 5 - Title I Requirements

This section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this section.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

Pursuant to 35 IAC 201.146, this condition is reserved for insignificant activities obligated to comply with Sections 9.1(d) and Section 39.5 of the Act; Sections 165, 173, and 502 of the Clean Air Act; or any other applicable permit or registration requirements. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any Insignificant Activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities:

Insignificant Activity	Number of Units	Insignificant Activity Category
300 gallon Hydrochloric Acid Storage Tank	1	35 IAC 201.210(a)(1) and 201.211
125 gallon Hydrochloric Acid Storage Tank	2	35 IAC 201.210(a)(1) and 201.211
Aqueous Salt Solution Storage Tank	1	35 IAC 201.210(a)(1) and 201.211
Slurry Drum Filling	1	35 IAC 201.210(a)(1) and 201.211
Propylene Glycol Storage Tanks	2	35 IAC 201.210(a)(2) or (a)(3)
Intermediate Solution Storage Tanks	3	35 IAC 201.210(a)(2) or (a)(3)
Warehouse drumming of bulk product	1	35 IAC 201.210(a)(2) or (a)(3)
Powdered Raw Material Rework	1	35 IAC 201.210(a)(2) or (a)(3)
Reactor (no regulated air pollutants)	1	35 IAC 201.210(a)(2) or (a)(3)
Low Vapor Pressure System Component Leaks (Fugitive)	-	35 IAC 201.210(a)(2) or (a)(3)
Filter Changing/Cleaning (Fugitive)	-	35 IAC 201.210(a)(2) or (a)(3)
Glycol Recovery System	1	35 IAC 201.210(a)(2) or (a)(3)
R&D Spray Dryer	1	35 IAC 201.210(a)(2) or (a)(3)
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	11	35 IAC 201.210(a)(4)
Storage tanks < 10,000 gallon with annual throughput < 100,000 gallon (not storing gasoline or any material listed as a HAP).	3	35 IAC 201.210(a)(10)
Any size storage tanks containing exclusively soaps, detergents, surfactants, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions where an organic solvent has not been mixed.	23	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.	4	35 IAC 201.210(a)(18)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

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4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 (see Conditions 7.2(a)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- d. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- e. Pursuant to 35 IAC 218 Subpart RR, VOM emissions from insignificant activities required to be included in determining applicability of 35 IAC 218 Subpart RR, in conjunction with applicable emission units in Section 4 of this permit, shall not equal or exceed 25 ton/yr.
- f. Pursuant to 35 IAC 218 Subpart RR, VOM emissions from each insignificant activities that is exempt from 35 IAC 218 Subpart RR shall not equal or exceed 1.0 tons per calendar year; and total VOM emissions from insignificant activities, in conjunction with applicable emission units in Section 4 of this permit not complying with 35 IAC 218, shall not exceed 5.0 tons per calendar year.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed.
- b. Potential to emit emission calculations before any air pollution control device for each insignificant activity.

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

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a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
 - A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. A construction permit is not required. Addresses are included in Attachment 3.
- iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 7(j) of the Act (see Condition 2.7) shall not apply to any change made in Condition 6.6(a) above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit. A construction permit is not required.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as described in Condition 6.3, a notification is not required. A construction permit is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The Illinois EPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the Illinois EPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the Illinois EPA, Compliance Section and Illinois EPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. 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 emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The Illinois EPA, Compliance Section shall be notified prior to these tests to enable the Illinois EPA to observe these tests pursuant to Section 39.7(a) as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The Illinois EPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the Illinois EPA's ability to observe testing.

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- c. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the Illinois EPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a). The Final Report shall include as a minimum:
- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM 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 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

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

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

<u>P</u> (T/hr)	<u>E</u> (lbs/hr)	<u>P</u> (T/hr)	<u>E</u> (lbs/hr)
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

3. Emissions Reduction Market System (ERMS) Requirements

- a. Pursuant to 35 IAC Part 205, ERMS seasonal emissions of VOM during the seasonal allotment period from May 1 through September 30 shall not exceed 15 tons/year, not including VOM emissions from insignificant emission units and activities as identified in Section 6 of this permit.
- b. Pursuant to 35 IAC 205, the Permittee shall maintain the following records to determine compliance with the above limitation:
 - 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 3 and 4 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 3 and 4 of this permit.
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- c. Pursuant to 35 IAC 205.205(b) and 35 IAC 205.300, the Permittee shall submit the seasonal emissions component of the Annual Emissions Report by November 30 of each year, reporting actual emissions of VOM during the seasonal allotment period.
- d. Pursuant to 35 IAC Section 205.150(c), in the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and shall immediately comply with 35 IAC Part 205, including holding allotment trading units (ATUs) for its VOM emissions during the first seasonal allotment period it exceeded 15 tons and each seasonal allotment period thereafter.

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, 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. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

Pollutant		Tons/Year
Volatile Organic Material	(VOM)	11.53
Sulfur Dioxide	(SO ₂)	2.04
Particulate Matter	(PM)	32.65
Nitrogen Oxides	(NO _x)	26.53
HAP, not included in VOM or PM	(HAP)	----
Total		72.75

Attachment 1 - List of Emission Units at This Source

Section	Emission Units	Description
4.1	Resin Reactor 3 (RX_1531)	Resin manufacturing (includes reactor, and condenser)
4.2	Acid-base reaction or blending (PLNT_901)	Acid-base reaction or blending process
4.2	Blending Vessel (RX_1521)	Blending vessel (vessel RX_1521 only)
4.3	Powdered inorganic salt manufacturing (PLNT_601)	Powdered inorganic salt manufacturing (pulverizer and classifier, spray dryer, dehumidifying concentrator, dust scrubber, and classifier baghouse filter)
4.3	Batch Oxidation Reactor (RX_301)	Batch process oxidation reactor
4.3	Acid-base reaction or blending (RX_201)	Acid-base reaction or blending process
4.3	Inorganic acid salts reactor (RX_101)	Inorganic acid salts reactor process
4.3	Acid-Base reaction or blending (RX_202)	Acid-base reaction or blending process
4.3	Acid-Base reaction or blending (RX_302)	Acid-base reaction or blending process
4.4	Industrial natural gas fired boiler (BO_1)	Natural gas-fired industrial boiler(14.7 mmBtu/hr)
4.4	Industrial natural gas fired boiler (BO_2)	Natural gas-fired industrial boiler(14.7 mmBtu/hr)
4.5	11,183 gallon fixed roof aboveground hydrochloric acid storage tank (STK_1413)	Hydrochloric acid storage tank
4.6	Bulk powder loading operation	Hopper bottom truck loading

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Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by Illinois EPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate

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lb	Pound
m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
CFR	Codified Federal Regulation
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 - Contact and Reporting Addresses

<p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #1</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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