217/782-2113

RENEWAL
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

A. W. Zengeler Cleaners, Inc.
Attn: Thomas J. Zengeler, President
550 Dundee Road
Northbrook, Illinois 60062-2883

I.D. No.: 031207AAU
Application No.: 96010026

Date Received: February 17, 2005
Date Issued: August 11, 2008
Expiration Date[1]: August 11, 2013

Operation of: Petroleum Solvent Dry Cleaner
Source Location: 550 Dundee Road, Northbrook, Cook County
Responsible Official: Thomas J. Zengeler, President

This permit is hereby granted to the above-designated Permittee to OPERATE a petroleum solvent dry cleaner, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

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

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

ECB:JMY:jws

cc: Illinois EPA, FOS, Region #1
CES
Lotus Notes
Owner's address as shown in Section 1.0

1 Except as provided in Conditions 1.5 and 8.7 of this permit.

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## 1.0 INTRODUCTION

### 1.1 Source Identification

A. W. Zengeler Cleaners, Inc.
550 Dundee Road
Northbrook, Illinois 60062-2883
847/272-6550

I.D. No.: 031207AAU
County: Cook
Standard Industrial Classification: 7216, Dry Cleaners

### 1.2 Owner/Parent Company

A. W. Zengeler Cleaners, Inc.
550 Dundee Road
Northbrook, Illinois 60062-2883

### 1.3 Operator

A. W. Zengeler Cleaners, Inc.
550 Dundee Road
Northbrook, Illinois 60062-2883

Thomas J. Zengeler, President
847-272-6550 ext. 14

### 1.4 Source Description

The source is a petroleum solvent dry cleaner. In addition, the dry cleaning process utilizes four washers and seven solvent recovery dryers.

Note: This narrative description is for informational purposes only and is not enforceable.

### 1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as “T1.”

## 2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

| | |
|---|---|
| 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 |
| CAA | Clean Air Act [42 U.S.C. Section 7401 et seq.] |
| CAAPP | Clean Air Act Permit Program |
| CAM | Compliance Assurance Monitoring |
| CEMS | Continuous Emission Monitoring System |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| ERMS | Emissions Reduction Market System |
| HAP | Hazardous Air Pollutant |
| IAC | Illinois Administrative Code |
| I.D. No. | Identification Number of Source, assigned by Illinois EPA |
| ILCS | Illinois Compiled Statutes |
| Illinois EPA | Illinois Environmental Protection Agency |
| LAER | Lowest Achievable Emission Rate |
| MACT | Maximum Achievable Control Technology |
| MSSCAM | Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas) |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| $NO_x$ | Nitrogen Oxides |
| NSPS | New Source Performance Standards |
| 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 |
| PSD | Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas) |
| RMP | Risk Management Plan |
| $SO_2$ | 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 |

## 3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

### 3.1 Identification of Insignificant Activities

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

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

None

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

250 Btu/Hr Natural Gas Fired Iron.

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

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

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit’s process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify

as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70°F, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.

3.3 Addition of Insignificant Activities

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

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

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

## 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| 01 | Washer #4 with Cartridge Filtration System | 1979 | None |
| | Solvent Recovery Dryer #4 | 1980 | None |
| | Solvent Recovery Dryer #5 | 1980 | None |
| | Solvent Recovery Dryer #6 | 1980 | None |
| | Solvent Recovery Dryer #7 | 1980 | None |
| | Washer #1 with Cartridge Filtration System | 1985 | None |
| | Washer #2 with Cartridge Filtration System | 1985 | None |
| | Washer #3 with Cartridge Filtration System | 1985 | None |
| | Solvent Recovery Dryer #2 | 1988 | None |
| | Solvent Recovery Dryer #3 | 1988 | None |
| | Solvent Recovery Dryer #1 | 1989 | None |
| 2 | Cleaver Brooks Boiler Natural gas fired 5.23 mmBtu max Btu/hr. | 1964 | None |
| | Cleaver Brooks Boiler Natural gas fired 8.37 mmBtu max Btu/hr. | 1980 | None |

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Applicability of Clean Air Act Permit Program (CAAPP)

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

### 5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for $PM_{2.5}$, moderate nonattainment for ozone, and attainment or unclassifiable for all other criteria pollutants (CO, Lead, NO, $PM_{10}$ and SO).

### 5.3 Source-Wide Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. 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 the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

5.3.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3.4 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 owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

b. 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.

5.3.6 Episode Action Plan

a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144 and is incorporated by reference into this permit.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.

c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

d. Any subsequent revisions of the plan shall also be sent to the Cook County Department of Environmental Control.

## 5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there are terms for unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

## 5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. However, there are requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

## 5.6 Source-Wide Production and Emission Limitations

### 5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

| Pollutant | Tons/Year |
|---|---|
| Volatile Organic Material (VOM) | 85.0 |
| Sulfur Dioxide ($SO_2$) | 0.2 |
| Particulate Matter (PM) | 0.2 |
| Nitrogen Oxides ($NO_x$) | 5.02 |
| HAP, not included in VOM or PM | ---- |
| Total | 90.42 |

5.6.2 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA. However, there are unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, 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:

a. Testing by Owner or Operator: The Illinois EPA 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 Illinois EPA, at such reasonable times as may be specified by the Illinois EPA 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 Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, 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 [35 IAC 201.282(b)].

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there are provisions for unit specific monitoring set forth in Section 7 of this permit.

## 5.9 Source-Wide Recordkeeping Requirements

### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

### 5.9.2 Records for HAP Emissions

a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

b. The Permittee shall keep an MSDS or equivalent document showing the formulation of each raw material product, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 – 3%) then the highest value shall be used.

### 5.9.3 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

## 5.10 Source-Wide Reporting Requirements

### 5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures

taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed by the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

## 6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

### 6.1 Emissions Reduction Market System (ERMS)

#### 6.1.1 Description of ERMS

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

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

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

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

#### 6.1.2 Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not

exceed 15 tons, not including VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit. This limitation is established at the request of the source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 IAC 205.205.

6.1.3 Recordkeeping and Reporting

a. 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 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;

   ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and

   iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.

b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 35 IAC 205.300.

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, pursuant to 35 IAC Section 205.150(c).

## 7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

### 7.1 Dry Cleaning Equipment

#### 7.1.1 Description

Dry cleaning involves the cleaning of fabrics using a petroleum solvent by means of one or more solvent washes, extraction of excess solvent by spinning, and drying by tumbling in a hot air stream. The dry cleaner uses petroleum solvent in a combination of washers, dryers, filters, stills, settling tanks, waste disposal systems, holding tanks, pumps, and attendant piping and valves. The dry cleaner does not utilize any emission control equipment. The dry cleaner uses petroleum solvent as the solvent.

Note: This narrative description is for informational purposes only and is not enforceable.

#### 7.1.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| Dry Cleaning Equipment | Washer #4 with Cartridge Filtration System | 1979 | None |
| | Solvent Recovery Dryer #4 | 1980 | None |
| | Solvent Recovery Dryer #5 | 1980 | None |
| | Solvent Recovery Dryer #6 | 1980 | None |
| | Solvent Recovery Dryer #7 | 1980 | None |
| | Washer #1 with Cartridge Filtration System | 1985 | None |
| | Washer #2 with Cartridge Filtration System | 1985 | None |
| | Washer #3 with Cartridge Filtration System | 1985 | None |
| | Solvent Recovery Dryer #2 | 1988 | None |
| | Solvent Recovery Dryer #3 | 1988 | None |
| | Solvent Recovery Dryer #1 | 1989 | None |

#### 7.1.3 Applicable Provisions and Regulations

a. The “affected dry cleaning equipment” for the purpose of these unit-specific conditions, are emission units described in Conditions 7.1.1 and 7.1.2.

b. The affected dry cleaning equipment is subject to 35 IAC 218.301 which provides that:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302 and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply

only to photochemically reactive material [35 IAC 218.301].

7.1.4 Non-Applicability of Regulations of Concern

a. The affected dry cleaning equipment is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Perchloroethylene Dry Cleaning Facilities, 40 CFR Part 63, Subpart M, because the affected dry cleaning equipment does not use perchloroethylene as the solvent.

b. The affected dry cleaning equipment is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected dry cleaning equipment does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Control Requirements and Work Practices

a. The owner or operator of the affected dry cleaning equipment shall employ good housekeeping practices including the following [35 IAC 218.608]:

i. Equipment containing solvent (washers, dryers, extractors, and filters) shall remain closed at all times except during load transfer and maintenance. Lint filter and button trap covers shall remain closed except when solvent-laden material is being removed [35 IAC 218.608(a)(1)].

ii. Cans, buckets, barrels, and other containers of solvent or of solvent-laden material shall be covered except when in use [35 IAC 218.608(a)(2)].

iii. Solvent-laden material shall be exposed to the atmosphere only for the minimum time necessary for load transfer [35 IAC 218.608(a)(3)].

b. Installation and operation of equipment [35 IAC 218.608(b)]:

i. All cartridge filters shall be enclosed and operated in accordance with the procedures and specifications recommended by the manufacturer for the cartridge filter. After installation, the cartridges shall be inspected, monitored, and maintained in accordance with the manufacturer’s recommendations [35 IAC 218.608(b)(1)]; and

ii. Vents on containers for new solvent and for solvent-containing waste shall be constructed and maintained so as to minimize solvent vapor emissions. Criteria for the minimization of solvent vapor emissions include the elimination of solvent buckets and

barrels standing open to the atmosphere, and the repair of gaskets and seals that expose solvent-rich environments to the atmosphere, to be determined through visual inspection [35 IAC 218.608(b)(2)].

iii. The owner or operator of the affected dry cleaning equipment shall install and operate a solvent recovery dryer in a manner such that the dryer remains closed and the recovery phase continues until a final recovered solvent flow rate of 50 milliliters per minute is attained [35 IAC 218.607(a)(2)].

iv. The owner or operator of the affected dry cleaning equipment shall install and operate a cartridge filtration system, and drain the filter cartridges in their sealed housings for 8 hours or more before their removal [35 IAC 218.607(b)(2)].

c. Leaks of petroleum solvent liquid and vapors shall be repaired within three working days of detection, unless necessary replacement parts are not on site [35 IAC 218.609(b)].

i. If necessary, repair parts shall be ordered within three working days of detection of the leak [35 IAC 218.609(b)(1)].

ii. The leak shall be repaired within three days of delivery of necessary parts [35 IAC 218.609(b)(2)].

d. If an odor is observed during odor nuisance monitoring, any odor observed shall be eliminated within 3 days.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected dry cleaning equipment is subject to the following:

a. Petroleum solvent shall be the only material used in the affected dry cleaner.

b. The affected dry cleaning equipment shall not exceed 3395 gallons per month and 27,157 gallons per year of Petroleum Solvent usage. 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].

c. VOM emissions from the affected dry cleaning equipment shall not exceed 10.6 tons per month and 85.0 tons per year.

These limitations were established in Permit 96010026, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD.

The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in Permit 96010026 that limit the VOM emissions from the affected dry cleaner below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1].

d. 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].

7.1.7 Testing Requirements

Testing requirements are not set for the affected dry cleaning equipment. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.1.8 Monitoring Requirements

Pursuant to Section 39.5(7)(d)(i), the Permittee shall perform the following inspections and/or observations:

a. The owner or operator of the affected dry cleaning equipment shall conduct the following visual inspections on a monthly basis:

   i. Observations to see if odors exist outside the facility.

   ii. Take a one minute sampling of solvent flow from the solvent discharge of each dryer within the last five minutes of the reclaim cycle, using a beaker stepped in 1 ml increments.

b. The owner or operator of the affected dry cleaning equipment shall conduct the following visual inspections on a weekly basis [35 IAC 218.609(a)]:

   i. Washers, dryers, solvent filters, settling tanks, vacuum stills, and other containers and conveyors of petroleum solvent shall be inspected for visible leaks of solvent liquid [35 IAC 218.609(a)(1)].

   ii. Pipes, hoses, and fittings shall be inspected for active dripping or dampness [35 IAC 218.609(a)(2)].

iii. Pumps and filters shall be inspected for leaks around seals and access covers [35 IAC 218.609(a)(3)].

iv. Gaskets and seals shall be inspected for wear and defects [35 IAC 218.609(a)(4)].

c. The owner or operator of the affected dry cleaning equipment shall conduct the following visual observations on a daily basis when dry cleaning equipment is operated [35 IAC 218.609(a)]:

i. The time of day filter cartridges are started draining in their sealed housings and the time of day the filter cartridges are removed and draining in their sealed cartridges is stopped.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected dry cleaning equipment to demonstrate compliance with Conditions 5.6.1, 7.1.3(b), 7.1.5, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. Records indicating that the solvent recovery dryers attain a final recovered solvent flow rate of less than 50 milliliters per minute;

b. Records indicating that the filter cartridges are drained in their sealed housings for at least 8 hours before their removal, with date and time of draining, and date and time of removal;

c. Petroleum solvent usage (gallon/month and gallon/year);

d. Material safety data sheet for petroleum solvent;

e. Monthly and annual aggregate VOM emissions, based on petroleum solvent usage and the applicable emission factor from Condition 7.1.12(d), with supporting calculations (pounds/hour, ton/month and ton/year);

f. Records for weekly visual inspections of the affected dry cleaner for leaks, with date, individual performing the inspection, nature of inspection, identification of equipment inspected, and results of visual inspections;

g. Records for repair of leaks, with identification and description of leak, date detected, date repair parts ordered, date of delivery of necessary parts, date repaired, and nature of repair; and

h. Records for odor nuisance monitoring.

7.1.10 Reporting Requirements

a. Reporting of Deviations

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

i. Emissions of VOM from the affected dry cleaning equipment in excess of the limits specified in Condition 7.1.6 within 30 days of such occurrence.

ii. Operation of the affected dry cleaning equipment in non-compliance with the control requirements and work practices as of Condition 7.1.5 within 30 days of such occurrence.

iii. Each period when the condition of a solvent recovery dryer that may have resulted in a final recovered solvent flow rate in excess of the applicable regulation specified in Condition 7.1.5 within 30 days of such an occurrence.

iv. Continued operation of the affected dry cleaning equipment without a cartridge filtration system or without properly drained filter cartridges, that may have resulted in noncompliance with the applicable regulation specified in Condition 7.1.5(b)(4), within 30 days of such an occurrence.

v. The Permittee shall notify the Illinois EPA within 30 days of a change in material used in the affected dry cleaner.

vi. Petroleum solvent usage of the affected dry cleaning equipment in excess of the operational limits specified in Condition 7.1.3(b) and 7.1.6(b), based on the current month’s records plus the preceding 11 months, within 30 days of such an occurrence.

vii. VOM emissions from the affected dry cleaning equipment in excess of the emission limits specified in Condition 7.1.6(c), based on the current month’s records plus the preceding 11 months, within 30 days of such an occurrence.

viii. Continued operation of the affected dry cleaning equipment while open, uncovered, exposed to the atmosphere, or not enclosed, that may have resulted in noncompliance with the operating requirements and

work practices specified in Condition 7.1.5(a)and(b), within 30 days of such an occurrence.

ix. Visual inspections of the affected dry cleaning equipment for leaks in excess of the weekly inspection requirements specified in Condition 7.1.8(b), within 30 days of such an occurrence.

x. Ordering of repair parts, and/or repair of leaks in excess of the time periods specified in Condition 7.1.5(c), within 30 days of such an occurrence.

xi. Operation of affected dry cleaning equipment while an odor nuisance exists within 5 days of such occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected dry cleaning equipment.

7.1.12 Compliance Procedures

a. Compliance with Conditions 7.1.3(b), is addressed by the monitoring requirements in Condition 7.1.8, the records required in Condition 7.1.9(h), and the reports required in Condition 7.1.10(xi).

b. Compliance with the petroleum solvent usage limitation of Condition 7.1.6(b) is addressed by the requirements of Condition 7.1.5, the records and reports required in Conditions 7.1.9(a)through(g), and 7.1.10(a)(i) through(a)(x).

c. Compliance with the VOM emission limitation of Condition 5.6.1 and 7.1.6(c) is addressed by the requirements of Condition 7.1.5 and the records and reports required in Conditions 7.1.9 and 7.1.10, and the emission factor and formula listed below:

| Pollutant | Emission Factor (lb/gal) |
|---|---|
| VOM | 6.26 |

The emission factor for petroleum solvent was determined from a material safety data sheet for the solvent.

Dry Cleaner Emissions (ton) = (Petroleum solvent usage, gal) x (the applicable emission factor, lb/gal) x (ton/2000 lb)

## 7.2 Unit 02: Natural Gas-Fired Boilers

### 7.2.1 Description

The boilers combust natural gas and are used to produce steam for comfort and process heating at the source.

### 7.2.2 List of Emission Units and Air Pollution Control Equipment

| Emission Unit | Source Description | Date Constructed | Emission Control Equipment |
|---|---|---|---|
| Boilers | Boiler 1, 5.23 mmBtu/hr Gas-Fired Boiler Cleaver-Brooks | 1964 | None |
| | Boiler 2, 8.37 mmBtu/hr Gas-Fired Boiler Cleaver-Brooks | 1980 | None |

### 7.2.3 Applicable Provisions and Regulations

a. The “affected boilers” for the purpose of these unit-specific conditions, are the boilers described in Conditions 7.2.1 and 7.2.2.

b. The affected boilers are subject to 35 IAC 212.123(a), which provides that:

   No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

### 7.2.4 Non-Applicability of Regulations of Concern

a. The affected boilers are not subject to 35 IAC 216.121, because the affected boilers have a maximum heat input capacity of <10 mmBtu/hr.

b. The affected boiler 2 is not subject to 35 IAC 212.122, because the affected boiler has a maximum heat input capacity of <250 mmBtu/hr.

c. The affected boiler 1 is not subject to 35 IAC 217.141, because the affected boiler has a maximum heat input capacity of <250 mmBtu/hr.

d. The affected boiler 2 is not subject to 35 IAC 217.121, because the affected boiler has a maximum heat input capacity of <250 mmBtu/hr.

e. The affected boilers are not subject to the New Source Performance Standards (NSPS) for Small - Industrial - Commercial - Institutional Steam Generating Units. These

rules do not apply because the affected boilers have a maximum heat input capacity of <10 mmBtu/hr.

f. The affected boilers are not subject to 40 CFR Part 63, Subpart DDDDD, because the affected boilers are not located at, and are not part of, a major source of HAP.

g. The affected boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Control Requirements and Work Practices

The Permittee shall fulfill the following work practice requirements pursuant to Section 39.5(7)(a)of the Act:

a. The Permittee shall follow good operating practices for the affected boilers, including inspection, prompt maintenance and repair of defects.

b. Natural gas shall be the only fuel fired in the affected boilers.

7.2.6 Production and Emission Limitations

Production and emission limitations are not set for the affected boilers.

7.2.7 Testing Requirements

Testing requirements are not set for the affected boilers. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.2.8 Monitoring Requirements

Inspect the affected boilers monthly for needed maintenance to assure proper operation.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.6.1 and 5.6.2, pursuant to Section 39.5(7)(b) of the Act:

a. Total natural gas usage for both boilers (mmcf/yr).

b. Annual aggregate $NO_x$, PM, $SO_2$, and VOM emissions from each boiler, based on fuel consumption and the applicable emission factors, with supporting calculations.

Annual emissions 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).

c. Records of monthly inspections, maintenance requirements and repairs completed for each boiler.

7.2.10 Reporting Requirements

Reporting of Deviations

The Permittee shall promptly and within 30 days notify the Illinois EPA, Air Compliance Unit, of deviations of the affected boilers with the permit requirements of Condition 7.2.5, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boilers.

7.2.12 Compliance Procedures

a. Compliance with the emission limits in Condition 5.6 1 is addressed by the work practices required in condition 7.2.5, records required in Conditions 7.2.9, and reports required in Conditions 7.2.10, and the emission factors and formulas listed below:

i. Emission factors for the affected boilers when fired by natural gas:

| Pollutant | Emission Factors (lb/mmscf) |
|---|---|
| VOM | 5.5 |
| PM | 7.6 |
| $SO_2$ | 0.6 |
| $NO_x$ | 100 |

The emission factors (lb/mmscf) are for Natural Gas-Fired Small Boilers (<100 mmBtu/hr Heat Input) from AP-42 Section 1.4 (dated 3/98).

(Boiler Emissions, lb) = (The Appropriate Emission Factor, lb/mmscf) x (Natural Gas Usage, mmscf)

ii. Compliance with Condition 7.2.3(b) is addressed by the work practices required in Condition 7.2.5, the inspection requirement in Condition 7.2.8, the record keeping requirements of Condition 7.2.9 and the reporting requirements of Condition 7.2.10.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after May 02, 2008 (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

## 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods 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 any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

| Monitoring Period | Report Due Date |
|---|---|
| January - June | September 1 |
| July - December | March 1 |

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

8.6.2 Test Notifications

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

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;

e. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The

test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.

b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iv. USEPA Region 5 - Air Branch

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

c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

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

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 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.

### 9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

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

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment),

practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any regulated activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

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

### 9.6.2 Records of Changes in Operation

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

### 9.6.3 Retention of Records

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

b. Other records required by this permit 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 longer period is specified by a particular permit provision.

## 9.7 Annual Emissions Report

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

## 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, 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 Permittee 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].

9.12.2 Reopening and Revision

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

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the 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 Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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 this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

## 10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

a. 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 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 subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

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

A. Up to process weight rates of 408 Mg/hr (450 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 1.214 | 2.54 |
| B | 0.534 | 0.534 |

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 11.42 | 24.8 |
| B | 0.16 | 0.16 |

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

| Metric P Mg/hr | E kg/hr | English P T/hr | E lb/hr |
|---|---|---|---|
| 0.05 | 0.25 | 0.05 | 0.55 |
| 0.1 | 0.29 | 0.10 | 0.77 |
| 0.2 | 0.42 | 0.2 | 1.10 |
| 0.3 | 0.64 | 0.30 | 1.35 |
| 0.4 | 0.74 | 0.40 | 1.58 |
| 0.5 | 0.84 | 0.50 | 1.75 |
| 0.7 | 1.00 | 0.75 | 2.40 |
| 0.9 | 1.15 | 1.00 | 2.60 |
| 1.8 | 1.66 | 2.00 | 3.70 |
| 2.7 | 2.1 | 3.00 | 4.60 |
| 3.6 | 2.4 | 4.00 | 5.35 |
| 4.5 | 2.7 | 5.00 | 6.00 |
| 9.0 | 3.9 | 10.00 | 8.70 |
| 13.0 | 4.8 | 15.00 | 10.80 |
| 18.0 | 5.7 | 20.00 | 12.50 |
| 23.0 | 6.5 | 25.00 | 14.00 |
| 27.0 | 7.1 | 30.00 | 15.60 |
| 32.0 | 7.7 | 35.00 | 17.00 |
| 36.0 | 8.2 | 40.00 | 18.20 |
| 41.0 | 8.8 | 45.00 | 19.20 |
| 45.0 | 9.3 | 50.00 | 20.50 |
| 90.0 | 13.4 | 100.00 | 29.50 |
| 140.0 | 17.0 | 150.00 | 37.00 |
| 180.0 | 19.4 | 200.00 | 43.00 |
| 230.0 | 22.0 | 250.00 | 48.50 |
| 270.0 | 24.0 | 300.00 | 53.00 |
| 320.0 | 26.0 | 350.00 | 58.00 |
| 360.0 | 28.0 | 400.00 | 62.00 |
| 408.0 | 30.1 | 450.00 | 66.00 |
| 454.0 | 30.4 | 500.00 | 67.00 |

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

b. Existing Process Emission Units for Which Construction or Modification Prior to April 14, 1972 [35 IAC 212.322].

i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

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

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 1.985 | 4.10 |
| B | 0.67 | 0.67 |
| C | 0 | 0 |

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

| | Metric | English |
|---|---|---|
| P | Mg/hr | T/hr |
| E | kg/hr | lb/hr |
| A | 25.21 | 55.0 |
| B | 0.11 | 0.11 |
| C | - 18.4 | - 40.0 |

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

| Metric | | English | |
|---|---|---|---|
| P | E | P | E |
| Mg/hr | kg/hr | T/hr | lb/hr |
| 0.05 | 0.27 | 0.05 | 0.55 |
| 0.1 | 0.42 | 0.10 | 0.87 |
| 0.2 | 0.68 | 0.2 | 1.40 |
| 0.3 | 0.89 | 0.30 | 1.83 |
| 0.4 | 1.07 | 0.40 | 2.22 |
| 0.5 | 1.25 | 0.50 | 2.58 |
| 0.7 | 1.56 | 0.75 | 3.38 |
| 0.9 | 1.85 | 1.00 | 4.10 |
| 1.8 | 2.9 | 2.00 | 6.52 |
| 2.7 | 3.9 | 3.00 | 8.56 |
| 3.6 | 4.7 | 4.00 | 10.40 |
| 4.5 | 5.4 | 5.00 | 12.00 |
| 9.0 | 8.7 | 10.00 | 19.20 |
| 13.0 | 11.1 | 15.00 | 25.20 |
| 18.0 | 13.8 | 20.00 | 30.50 |
| 23.0 | 16.2 | 25.00 | 35.40 |
| 27.2 | 18.15 | 30.00 | 40.00 |
| 32.0 | 18.8 | 35.00 | 41.30 |
| 36.0 | 19.3 | 40.00 | 42.50 |
| 41.0 | 19.8 | 45.00 | 43.60 |
| 45.0 | 20.2 | 50.00 | 44.60 |
| 90.0 | 23.2 | 100.00 | 51.20 |
| 140.0 | 25.3 | 150.00 | 55.40 |
| 180.0 | 26.5 | 200.00 | 58.60 |
| 230.0 | 27.7 | 250.00 | 61.00 |
| 270.0 | 28.5 | 300.00 | 63.10 |
| 320.0 | 29.4 | 350.00 | 64.90 |
| 360.0 | 30.0 | 400.00 | 66.20 |
| 400.0 | 30.6 | 450.00 | 67.70 |
| 454.0 | 31.3 | 500.00 | 69.00 |

iv. For process weight rates of less than 100 pounds per hour, the allowable rate is 0.5 pounds per hour [35 IAC 266.110].

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf
www.epa.state.il.us/air/permits/197-fee.pdf

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