

FINAL DRAFT/PROPOSED CAAPP PERMIT
Alsip Paper Condominium Association
I.D. No.: 031003ADA
Application No.: 95090155
October 13, 2000

217/782-2113

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

PERMITTEE

Alsip Paper Condominium Association
Attn: Rick FLOWERS
13101 South Pulaski Road
Alsip, Illinois 60803

Application No.: 95090155 I.D. No.: 031003ADA
Applicant=s Designation: Date Received: September 13, 1999
Operation of: Power Plant
Date Issued: !TO BE DETERMINED! Expiration Date²: !DATE!
Source Location: 13101 South Pulaski Road, Alsip, Cook County
Responsible Official: Kevin Kuliga, President

This permit is hereby granted to the above-designated Permittee to OPERATE a power plant, producing both electricity and steam, 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 Dan Punzak at 217/782-2113.

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

DES:DGP:psj

cc: Illinois EPA, FOS, Region 1
USEPA

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

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Alsip Paper Condominium Association
13101 South Pulaski Road
Alsip, Illinois 60803
708/389-8520

I.D. No.: 031003ADA
Standard Industrial Classification: 4931

1.2 Owner/Parent Company

Alsip Paper Condominium Association
13101 South Pulaski Road
Alsip, Illinois 60803

1.3 Operator

Alsip Paper Condominium Association
13101 South Pulaski Road
Alsip, Illinois 60803

Rick Flowers
708/389-8520

1.4 General Source Description

The Alsip Paper Condominium Association is located at 13101 South Pulaski Road in Alsip, Cook County. It is jointly owned by Madison Paper Corporation and Georgia-Pacific Tissue and all the electric power and steam generated is used by the owners. The equipment consists of a gas turbine, a duct burner and two boilers. Natural gas is the only fuel used.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ft ³	cubic feet
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
mmft ³	million cubic feet
MW	megawatt
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
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I B identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New B identifies Title I conditions that are being established in this permit
T1R	Title I Revised B 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 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:

None

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

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)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

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

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

3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
 - 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
 - 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.3 Addition of Insignificant Activities
- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
 - 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
 - 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Firing Rate mmBtu/hr	Date Constructed	Emission Control Equipment
01	Boilers #1 and #2	155.0 (Each)	1975	None
02	Gas Turbine	140.0	1987	None
03	Duct Burner	39.8	1987	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.
- 5.1.3 For purposes of the CAAPP and Title I of the Clean Air Act, Alsip Paper Condominium Association is considered a single source with Madison Paper Corporation, I.D. No. 031003AAW, located at 13101 South Pulaski Road (i.e., same address). The source has elected to obtain separate CAAPP permits for these locations.

5.2 Applicable Regulations

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

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 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.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual

compliance certification, as required by 40 CFR Part 70 or 71.

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

5.3 Non-Applicability of Regulations of Concern

N/A

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	22.94
Sulfur Dioxide (SO ₂)	1.27
Particulate Matter (PM)	37.04
Nitrogen Oxides (NO _x)	498.10
HAP, not included in VOM or PM	0.04
TOTAL	559.39

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 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.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

Since all emissions occur as a result of the combustion of natural gas, only minor amounts of HAPs should result and special records are not required.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

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6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Boilers

7.1.1 Description

Boilers are used to produce steam for heating and process use at the source.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
01	Boiler #1 & #2	Natural gas-fired boilers. Maximum heat input capacity: 155 mmBtu/hr each	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An affected gas-fired boiler@ for the purpose of these unit-specific conditions, is a boiler identified in Condition 7.1.2.
- b. Each affected boiler identified in Condition 7.1.2 is subject to the emission limits identified in Condition 5.2.2.
- c. The emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.1.4 Non-Applicability of Regulations of Concern

- a. The New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Db, applies to units constructed, reconstructed, or modified after June 19, 1984. All boilers from Group 1a were constructed prior to June 19, 1984, therefore, these rules do not apply.
- b. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9,

1989. All boilers from Group 1b and 1d were constructed prior to June 9, 1989, therefore, these rules do not apply.

- c. All boilers are not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of each boiler is less than 73.2 MW (250 mmBtu/hr).
- d. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.1.5 Operational and Production Limits and Work Practices

- a. Each boiler shall only be operated with natural gas as the fuel.
- b. Natural gas usage in the two boilers combined shall not exceed 1778 mmft³.

7.1.6 Emission Limitations

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

NO _x Emissions	
(Ton/Month)	(Ton/Year)
30.0	249.0

These limits are based on the maximum gas usage specified in Condition 7.1.5(b).

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) [T1N].

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the NO_x emissions from the affected boilers below the levels that would trigger the applicability

of these rules, consistent with the information provided in the CAAPP application [T1N].

Specifically, the boilers are not new but emissions must be limited so that at the time of construction of other equipment the source was not major. NO_x is the only pollutant that could make the source major when the other equipment was constructed in the late 1980's.

7.1.7 Operating Requirements

Upon request by the Illinois EPA the boilers shall be tested to determine an NO_x emission rate in lb/mmBtu using USEPA Method 7.

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items which demonstrate compliance with Conditions 5.5.1 and 7.1.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for the boilers combined (ft³/yr); and
- b. Annual aggregate NO_x, PM, SO₂, and VOM emissions from the boilers, based on fuel consumption and the applicable emission factors, with supporting calculations;
- c. Operating hours of each boiler; and
- d. Maintenance records for each boiler.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected boilers 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:

- a. Natural gas usage in excess of Condition 7.1.5(b).

- b. Emissions of NO_x, PM, SO₂, or VOM from the boilers in excess of the limits specified in Condition 5.5.1 or 7.1.6 based on the 12 months rolling period.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- a. Compliance with Condition 7.1.3(c) is assumed to be achieved by the work-practices inherent in operation of natural gas-fired boilers.
- b. To determine compliance with the emission limits in Condition 5.5.1, emission from the affected boilers burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	Natural Gas Emission Factor (lb/mmft ³)
NO _x	280
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for large wall-fired boilers/uncontrolled/pre-NSPS (> 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, Supplement D. March, 1998.

$$\text{Boiler Emissions (lb)} = (\text{Natural Gas Consumed, mmft}^3) \times (\text{The Appropriate Emission Factor, lb/mmft}^3)$$

7.2 Unit: Gas Turbine and Duct Burners
 Control: None

7.2.1 Description

A gas turbine is used to power an electric generator and provide electricity. The gas turbine also has an associated duct burner which provides steam.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Rated Heat Input
02	Gas Turbine	140 mmBtu/hr
03	Duct Burner	39.8 mmBtu/hr

7.2.3 Applicability Provisions and Applicable Regulations

a. An "affected gas turbine" for the purpose of these unit-specific conditions is a gas turbine that is subject to the NSPS for Stationary Gas Turbines, 40 CFR 60 Subparts A and GG, because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour (10 mmBtu/hr), based on the lower heating value of the fuel fired and the gas turbine commenced construction, modification, or reconstruction after October 3, 1977. The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.

i. Standard for Nitrogen Oxides:

Pursuant to 40 CFR 60.332(a)(2), no owner or operator of an affected gas turbine shall cause to be discharged into the atmosphere from such gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0150 \frac{(14.4)}{Y} + F$$

Where:

STD = allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = manufacturer's rated heat rate at manufacturer's peak load (kilojoules per watt hour), or

actual measured heat rate based on lower heater value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen calculated from the nitrogen content of the fuel. For natural gas F = 2%.

Since Y = 14.4 for this unit, the standard is 0.0158 volume percent or 158 ppm.

ii. Standard for Sulfur Dioxide

An affected gas turbine is subject to the SO₂ standard of 40 CFR 60.333. However, the sulfur content of natural gas is so low that compliance with the standard is assured.

- b. 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, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301]. This limitation only applies if the duct burner is not operating. The duct burner is a fuel combustion emission unit and '218.301 does not apply to fuel combustion emission units.
- c. An "affected duct burner" for the purpose of these unit-specific conditions is a fuel combustion unit identified in Condition 7.2.3 which further burns the gases from the gas turbine as well as additional fuel.
- d. The duct burner is subject to 35 IAC 216.121 which states the emissions of CO from any fuel combustion unit with actual heat input greater than 10 mmBtu/hr shall not exceed 200 ppm, corrected to 50 percent excess air.

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected gas turbine is not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected gas turbine is not by definition a fuel combustion emission unit.
- b. The affected gas turbine is not subject to 35 IAC 217.121, emissions of nitrogen oxides from new fuel combustion emission sources, because the actual heat input of each unit is less than 73.2 MW (250 mmBtu/hr) and the affected gas turbine is not by definition a fuel combustion emission unit.
- c. This permit is issued based on the affected gas turbine not being subject to 35 IAC 212.321 because due to the unique nature of this process, such rules cannot reasonably be applied.
- d. The New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db, applies to coal and oil-fired fuel combustion units with a firing rate between 100 and 250 mmBtu/hr constructed, reconstructed, or modified after June 19, 1984. The duct burner was constructed after June 19, 1984, but is gas-fired and less than 100 mmBtu/hr firing rate and therefore, these rules do not apply.
- e. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units burning coal, oil or gas with a firing rate between 10 and 100 mmBtu/hr and constructed, reconstructed or modified after June 9, 1989. The duct burner was constructed prior to June 9, 1989, therefore, these rules do not apply.
- f. The duct burner is not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of the duct burner is less than 73.2 MW (250 mmBtu/hr).
- g. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.2.5 Operational and Production Limits and Work Practices

- a. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected gas turbine in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or the USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source [40 CFR 60.11(d)].
- b. The affected gas turbine shall only be fired with natural gas.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5, the affected gas turbine and duct burner combined shall not exceed the following limits:

<u>Pollutant</u>	<u>Emissions (Lb/hr) (Ton/Yr)</u>	
NO _x	56.19	249.1
CO	18.97	83.1
PM	6.34	24.0
VOM	3.57	15.66
SO ₂	0.12	0.47

The hourly limits are based on the maximum firing rates specified in Condition 7.2.2 but the annual limit is based on slightly below maximum firing rates on an annual basis. The emission levels are based on use of two different emission factors (See Condition 7.2.12) and thus natural gas usage has not been limited because the limit amount would depend on the ratio of gas usage to each of the units. Both the NO_x and PM emission levels have been set at just below PSD major modification applicability levels.

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].

The above limitations contain revisions to previously issued Construction Permit 88010018. The source has

requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, that permit did not include limits for the duct burner, which was installed in conjunction with the gas turbine. Emission factors have also been revised since the original installation. [T1R]

7.2.7 Testing Requirements

Upon request by the Illinois EPA, the gas turbine and/or duct burner shall be tested to determine the emission rate of NO_x using the test method specified in 40 CFR 60.335.

7.2.8 Monitoring Requirements

Pursuant to 40 CFR 60.334(b), the Permittee shall monitor sulfur content and nitrogen content of the fuel being fired in an affected gas turbine. The frequency of determination of these values shall be as follows:

For natural gas, which is supplied without intermediate bulk storage, the values shall be determined and recorded every 6 months. This is a custom schedule for determination of the values based on the design and operation of the affected gas turbine and the characteristics of the fuel supply, substantiated with data submitted to and approved by the Illinois EPA [40 CFR 60.334(b)(2)].

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.7, the Permittee shall maintain records of the following items for the affected gas turbine to demonstrate compliance with Conditions 5.5.1, 7.2.3, 7.2.5, and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

- a. An operating log for each affected gas turbine that includes the information required by Condition 5.7.1(a).
- b. A file that includes the information required by Condition 5.7.1, including the nitrogen content of the fuel relied upon, if greater than zero, to determine the applicable standard pursuant to Condition 7.2.3(a)(i) and show compliance with such standard and the hourly emission limit pursuant to Condition 7.2.6.
- c. Natural gas fuel usage for the affected gas turbine, ft³/mo and ft³/yr;
- d. The nitrogen content of the fuel to be used in the affected gas turbine as follows:

For natural gas, this shall be recorded on a daily basis, except as provided in Condition 7.2.8.
- e. The sulfur content of the fuel to be used in the affected gas turbine as monitored pursuant to Condition 7.2.8.
- f. The heat content of the fuel used in the affected gas turbine as follows:

Natural gas, Btu/ft³.
- g. Monthly and annual aggregate NO_x, PM, SO₂, and VOM emissions from the affected gas turbine shall be maintained, based on fuel consumption and the applicable emission factors in Condition 7.2.12, with supporting calculations.

7.2.10 Reporting Requirements

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

Emissions of NO_x from the affected gas turbine in excess of the limits specified in Condition 7.2.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with Condition 7.2.3(a) is demonstrated by operation of the affected gas turbine with natural gas only.
- b. Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Natural gas combustion emissions.

- i. To determine compliance with Conditions 5.5.1 and 7.2.6, the natural gas combustion emissions from the affected gas turbine shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> (lb/mmBtu)
NO _x	387.95 ^a
PM	0.0419
SO ₂	0.0006
VOM	0.024

^a manufacturer's warranty value in lb/mmft³

The other emission factors are for uncontrolled natural gas-fired gas turbines, Table 3.1-1, Volume I, Supplement B, October 1996.

Gas Turbine NO_x Emissions = (Natural Gas Consumed, mmft³) x (387.95 lb/mmft³)

Gas Turbine Emissions (lb, excluding NO_x) = (Natural Gas Consumed, ft³) x (Heat Content, Btu/ft³) x (The Appropriate Emission Factor, lb/mmBtu)

- ii. To determine compliance with the emission limits in Condition 5.5.1, emission from the affected boilers burning natural gas shall be calculated based on the following emission factors:

FINAL DRAFT/PROPOSED CAAPP PERMIT
Alsip Paper Condominium Association
I.D. No.: 031003ADA
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<u>Pollutant</u>	Natural Gas Emission Factor <u>(lb/mmft³)</u>
NO _x	100
CO	84
PM	7.6
SO ₂	0.6
VOM	5.5

These are the emission factors for small boilers/uncontrolled/pre-NSPS (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Fifth Edition, Supplement D. March, 1998.

Duct Burner Emissions (lb) = (Natural Gas Consumed, Mft³) x (The Appropriate Emission Factor, lb/Mft³)

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 _____ **{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

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 without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and 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 [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. 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;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

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

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

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ii. Illinois EPA - Air Regional Field Office

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

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

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated

equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

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

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 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: _____

DGP:psj

217/782-2113

May 26, 2000

FSC Paper Company
Attn: Glen Johnson
13100 South Pulaski Road
Alsip, Illinois 60803

Re: Preliminary Draft Title V Permit for Alsip Paper Condominium
Association
I.D. No.: 031003ADA
Application No.: 95090155

Dear Mr. Johnson:

The Illinois EPA sent Alsip Paper Condominium Association (Alsip PCA) a Preliminary Draft CAAPP Permit on February 1, 2000. Attachment A to the permit raised some complex issues in regard to the permit. Mr. Dan Punzak of my staff, who prepared the draft, has granted Alsip PCA, of which FSC is a co-owner, several verbal extensions beyond the requested response date.

The Illinois EPA understands that due to the potential sale of FSC to a new owner, the interested purchaser wishes to know that failure to respond is not creating compliance problems and desires additional time. Our response is that the preliminary draft is a courtesy to the Permittee in order to solicit comments before sending a draft to public notice. Failure to respond is not a legal problem but in theory the Illinois EPA could send a draft to public notice. However, due to the complex issues raised in the draft, the Illinois EPA extends the time for a response to September 1, 2000. Based on phone conversations and other information, the Illinois EPA may require an emissions test to be conducted in the interim and results submitted by that date.

If you have any questions, please call Dan Punzak at 217/782-7278.

Sincerely,

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

DES:DGP:jar

cc: Dan Punzak

I. INTRODUCTION

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

The Alsip Paper Condominium Association is located at 13101 South Pulaski Road in Alsip, Cook County. It is jointly owned by Madison Paper Corporation and Georgia-Pacific Tissue and all the electric power and steam generated is used by the owners. The equipment consists of a gas turbine, a duct burner and two boilers. Natural gas is the only fuel used.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Firing Rate mmBtu/hr	Date Constructed	Emission Control Equipment
01	Boilers #1 and #2	155.0 (each)	1975	None
02	Gas Turbine	140.0	1987	None
03	Duct Burner	39.8	1987	None

III. EMISSIONS

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

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	22.94
Sulfur Dioxide (SO ₂)	1.27
Particulate Matter (PM)	37.04
Nitrogen Oxides (NO _x)	498.10
HAP, not included in VOM or PM	0.04
TOTAL	559.39

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in

a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

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

Title I

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

VI. REQUEST FOR COMMENTS

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

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

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