

217/782-2113

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

PERMITTEE

Marathon Ashland Petroleum, LLC
Attn: Environmental Compliance Manager, TT&M
539 South Main Street
Findlay, Ohio 45840

Application No.: 95060014 I.D. No.: 033808AAL
Applicant's Designation: Date Received: June 6, 1995
Operation of: Robinson Terminal
Date Issued: August 15, 2003 Expiration Date²: August 15, 2008
Source Location: 12345 East 1050th Street, Robinson, Crawford County
Responsible Official: Patrick J. Barnes, District Manager, TT&M

This permit is hereby granted to the above-designated Permittee to OPERATE a bulk gasoline terminal, 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 3
CES
Lotus Notes

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

2 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Marathon Ashland Petroleum, LLC - Robinson Terminal
12345 East 1050th Avenue
Robinson, Illinois 62454
618/544-3139

I.D. No.: 033808AAL
Standard Industrial Classification: 5171, Petroleum Terminals

1.2 Owner/Parent Company

Marathon Ashland Petroleum, LLC
539 South Main Street
Findlay, Ohio 45840

1.3 Operator

Marathon Ashland Petroleum, LLC
539 South Main Street
Findlay, Ohio 45840

Environmental Compliance Manager, TT&M
419/422-2121

1.4 General Source Description

The Marathon Ashland LLC Terminal is located at 12345 East 1050th Street in Crawford County. The source loads gasoline and other petroleum products into tank trucks. There are also several small storage tanks. The actual gasoline tanks are owned and operated by the adjacent refinery, which is obtaining its own CAAPP permit.

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
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
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
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
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 - 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
TOC	Total Organic Compounds
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:

The following fixed roof tanks storing gasoline or fuel oil additives: AA-7-1, AA-8-2, AA-1-3, AA-1-4, AA-2-5.

The following underground tanks storing gasoline or fuel oil additives: RB-1-6.

Wastewater storage tank WB-10-1

Oil Water Separator

Groundwater Remediation System

- 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:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

- 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.
- 3.2.4 For each storage tank with a capacity greater than 250 gal and storing a volatile organic material with a vapor pressure exceeding 2.5 psia, the tank shall be equipped with a permanent submerged loading pipe as required by 35 IAC 215.122(b).

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
Loading Rack	Four Bay Loading Rack for Loading Various Petroleum Products - Gasoline/Diesel/Kerosene - Into Tank Trucks	1976	Vapor Combustion Unit for Gasoline Loading (One Permanent with Three Identical Back-Up Portable Combustion Units)
T-1	Transmix Storage Tank, Fixed Roof, Less Than 19,815 Gallons in Capacity	2003	Submerged Loading Pipe
Equipment Components (Valves, Flanges, Pump Seals, Etc.)	Processing of Material Throughout the Source's Piping System	N/A	Work Practices and Equipment Replacement

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 VOM and HAP emissions.
- 5.1.2 For purposes of the CAAPP and Title I of the Clean Air Act, Marathon Ashland Robinson Terminal is considered a single source with Marathon Ashland Robinson Refinery, I.D. No. 033808AAB, located adjacent to the terminal. 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

- a. This stationary source, as defined in 40 CFR Section 68.3, is subject to 40 CFR Part 68, the Accidental Release Prevention regulations [40 CFR 68.215(a)(1)].
- b. The owner or operator of a stationary source shall revise and update the RMP submitted, as specified in 40 CFR 68.190.

5.2.5 Future Regulations

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow

alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

5.3 Non-Applicability of Regulations of Concern

- 5.3.1 This permit is issued based on the source not being subject to 40 CFR Part 63, Subpart XX, because the gasoline truck loading rack was constructed prior to the applicability date of December 17, 1980 and also the source is subject to a NESHAP for terminals and units subject to the NESHAP are not subject to NSPS.
- 5.3.2 This permit is issued based on the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the source is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).
- 5.3.3 This permit is issued based on the source not being subject to 40 CFR 63 Subpart Y, Marine Tank Vessel Loading, because the source does not load marine vessels.
- 5.3.4 This permit is issued based on the source not being subject to 35 IAC Part 218 or 219, because the source is not located in the Chicago or St. Louis Metropolitan Areas.

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 work practice requirements to meet the requirements of 40 CFR 63.424:

- a. The Permittee shall inspect all equipment in gasoline service for leaks on at least a monthly basis. Detection methods shall include sight, sound and smell but with an alternative of using instruments, e.g., in conjunction with similar programs at the adjacent refinery. Each leak shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious

if an initial attempt at repair is made within 5 days and completed within 15 days. This requirement provides the basis for determining compliance with 35 IAC 215.142, as noted in Section 5.10.

- b. Owners and operators shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
 - i. Minimize gasoline spills;
 - ii. Clean up spills as expeditiously as practicable;
 - iii. Cover all open gasoline containers with a gasketed seal when not in use; and
 - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil-water separators.

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)	51.4
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	---
Nitrogen Oxides (NO _x)	5.0
HAP, not included in VOM or PM	---
Total	56.4

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs due to its co-location with the refinery.

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 VOM and HAP Emissions

The Permittee shall maintain records of VOM and to demonstrate compliance with the annual emission limits in Condition 5.5.

5.6.3 Records for Equipment Leak Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4.

- a. A list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility;
- b. The performance of all inspections or other observations identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;
- c. The condition, i.e., idle or operation, of each piece of equipment, pump or compressor inspected;
- d. The presence of a leak, if detected, with description and the means of identification;
- e. The date the leak was repaired, or the component taken out of service, if required; and

- f. If a corrective action was needed, as in Condition 5.4, but was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

5.6.4 Records for Operating Scenarios

N/A

5.6.5 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 deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

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

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM Emissions

- a. 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.
- b. For the purpose of estimating VOM emissions from the storage tanks, the current version of TANKS program or equivalent such as AP-42 emission factors is acceptable.
- c. For the purpose of estimating fugitive VOM emissions from components at the facility, the emission factors found in "Marketing Terminal Emission Factors" published by USEPA on the Technology Transfer Network bulletin board in February, 1995 or the best available emission factors, including factors developed by the source, are acceptable.
- d. For the purpose of estimating HAP emissions from equipment at the facility, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable. Other means of estimating HAP emissions utilizing USEPA accepted methodologies such as facility specific testing or API provided information is also acceptable.
- e. Total VOM and HAP emissions at the source shall be determined as the sum of the respective VOM and HAP emissions from the loading rack (Condition 7.1), the tanks (Condition 7.2) and fugitives.

5.10 Special Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 215.142 as Condition 5.4 established appropriate compliance procedures for this rule that do not rely on such measurements.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Loading Racks

Control: Vapor Combustion Unit for Gasoline Loading

7.1.1 Description

The truck loading rack uses a vapor collection system that includes an equalizer and bladder tanks. This system helps to reduce surges to the vapor combustion unit, basically a flare.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Loading Rack	Four Bay Loading Rack for Loading Various Petroleum Products - Gasoline/Diesel/Kerosene- Into Tank Trucks	Vapor Combustion Unit For Gasoline Loading (One Permanent with Three Identical Back-Up Portable Combustion Units)

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected truck loading rack for gasoline, diesel or kerosene" for the purpose of these unit-specific conditions, is a rack in which gasoline, diesel or kerosene is loaded at the source into tank trucks. These petroleum products are shipped to the source from storage tanks located at another permitted facility. When loading gasoline the vapors displaced from the trucks are vented to a vapor combustion unit (VCU). When loading fuel oil, diesel or kerosene and the previous load in the tank truck was not gasoline, the vapors contain a much lower concentration of VOM and are not vented to the VCU. If fuel oil, diesel or kerosene is being loaded but the previous load was gasoline, the vapor must be vented to the VCU.
- b. i. When loading gasoline the operation is subject to 40 CFR 63 Subparts A and R, Gasoline Terminals (§ 63.420 thru 63.429). The specific emission standard for the gasoline loading is contained in § 63.422(b), which limits emissions to 10 mg of total organic compounds per liter of gasoline loaded. The tank trucks loaded must meet vapor-tight requirements described in 40 CFR 63.425. The equipment leaks provisions (i.e., for pumps and valves) is described in 40 CFR 63.424 and uses Method 21 in 40 CFR 60, Appendix A to determine leaks.

ii. Startup, Shutdown and Malfunction (SSM) Plan

The Permittee is required to have a written startup, shutdown, and malfunction (SSM) plan for the terminal on site under 40 CFR 63.6(e) (3).

The SSM Plan and any revision to that plan is incorporated by reference and is enforceable as a term and condition of this permit.

Revisions to the SSM Plan are automatically incorporated by reference into this permit and do not require a permit revision.

iii. When loading gasoline the operation is subject to 35 IAC 215.582(a)(1) which limits emissions to 80 mg of VOM per liter of gasoline loaded. Compliance with Condition 7.1.3(b)(i) shall be deemed compliance with this requirement.

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected gasoline loading operation not being subject to the New Source Performance Standards (NSPS) for Bulk Gasoline Terminals, 40 CFR Part 60, Subpart XX, Bulk Gasoline Terminals, because the affected gasoline terminal was constructed prior to the applicability date of December 17, 1980.

d. This permit is issued based on the affected gasoline loading operation not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected gasoline loading operation is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.1.5 Control and Operational Requirements

a. The gasoline cargo tank loading racks and vapor collection and combustion systems shall be designed and operated as follows: (40 CFR 63.422)

i. The emissions from the gasoline cargo tank loading racks with vapor collection and combustion systems shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded. (40 CFR 63.422(b))

ii. Failure to maintain a flame when introducing gasoline vapors into the combustion chamber of the vapor combustion unit (VCU) shall be considered a violation of this emission standard. (40 CFR 63.427(b))

- b. The terminal's vapor collection and vapor combustion systems shall meet the following requirements:
 - i. The vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. (40 CFR 60.502(d))
 - ii. The vapor collection and gasoline loading equipment shall be designed and operated to prevent gauge pressure in the gasoline cargo tank from exceeding 450 mm of water during product loading. (40 CFR 60.502(h))
 - iii. No pressure-vacuum vent in the vapor collection system shall begin to open at a system pressure less than 450 mm of water. (40 CFR 60.502(i))
 - iv. The Permittee shall provide a pressure tap or equivalent on the vapor collection system. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection. (35 IAC 215.581(b)(2))
- c. All loading of liquid product into gasoline cargo tanks at this bulk gasoline terminal shall be limited to vapor-tight tanks using the following procedures in accordance with 40 CFR 60.502(e): (40 CFR 63.422(c))
 - i. The owner or operator shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline cargo tank. (40 CFR 60.502(e)(1))
 - ii. The owner or operator shall require the tank identification number to be recorded as each gasoline cargo tank is loaded. (40 CFR 60.502(e)(2))
 - iii. The owner or operator shall cross-check each tank identification number obtained above with the file of tank vapor tightness documentation within two weeks after the tank is loaded. (40 CFR 60.502(e)(3))
 - iv. The owner or operator shall notify the owner or operator of each nonvapor-tight gasoline cargo tank loaded at the terminal within three weeks after the loading has occurred. (40 CFR 60.502(e)(4))

- v. The terminal owner or operator shall take steps assuring that a nonvapor-tight gasoline cargo tank will not be reloaded at the terminal until vapor tightness documentation for that gasoline cargo tank is obtained which documents that: (40 CFR 63.422(c)(2))
 - A. The gasoline cargo tank meets the applicable test requirements in 40 CFR 63.425(e), i.e., Annual Certification Test;
 - B. For each gasoline cargo tank failing the test in 40 CFR 63.425(f) or (g), i.e., Leak Detection Test or Nitrogen Pressure Decay Field Test, at the terminal, the cargo tank either:
 - 1. Before repair work is performed on the cargo tank, meets the Nitrogen Pressure Decay Field Test or Continuous Performance Pressure Decay Test of 40 CFR 63.425(h), or
 - 2. After repair work is performed on the cargo tank before or during Nitrogen Pressure Decay Field Test or Continuous Performance Pressure Decay Test, subsequently passes the Annual Certification Test.
- d. The Permittee shall take the following measures, along with other reasonable measures, as to not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. (40 CFR 424(g))
 - i. Minimize gasoline spills;
 - ii. Clean up spills as expeditiously as practicable;
 - iii. Cover all open gasoline containers with a gasketed seal when not in use; and
 - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

7.1.6 Emission Limitations

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

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Testing Requirements

- a. Upon request by the Illinois EPA, the loading rack and associated vapor combustion unit shall be tested to verify compliance with Condition 7.1.3(b) using the test methods and procedures in 40 CFR 60.503. [40 CFR 63.425(a)]
- b. The gasoline cargo tanks loaded at this terminal are subject to the following test requirements at all times to demonstrate that they are vapor tight: (40 CFR 63.421)
 - i. Leak Detection Test using Method 21, Appendix A, 40 CFR 60, modified in accordance with 40 CFR 63.425(f).
 - ii. Nitrogen Pressure Decay Field Test, in accordance with 40 CFR 63.425(g).
 - iii. Continuous Performance Pressure Decay Test using Method 27, Appendix A, 40 CFR 60, in accordance with 40 CFR 63.425(h).

7.1.8 Inspection and Monitoring Requirements

- a. The terminal's vapor combustion unit shall be continuously monitored in the following manner:
 - i. A continuous monitoring system (CMS) for the vapor combustion unit shall be installed, calibrated, certified, operated and maintained according to the manufacturer's recommendation. (40 CFR 63.427(a))
 - ii. The VCU shall have a heat-sensing device, such as an ultra-violet beam sensor or a thermocouple, installed in proximity to the pilot light to indicate the presence of a flame. (40 CFR 63.427(a)(4))
 - iii. The VCU and its monitor shall be maintained and operated as per the manufacturer's and/or vendor's recommendations.

- b. i. The Permittee shall perform a monthly visual (sight, sound, and smell) inspection for leaks of all equipment in gasoline liquid or vapor service during the loading of a gasoline cargo tank. (40 CFR 63.424(a))
- ii. When a leak is detected, repair shall be made as soon as possible.
 - A. An initial attempt at repair shall be made no later than 5 calendar days after the leak is detected.
 - B. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of leak, except as provided below.
 - C. If repair within 15 days is demonstrated on an individual leak basis to not be feasible, the owner or operator may delay repair by providing reasons why a delay is needed and the date by which repair is expected to be completed in a written report to the Illinois EPA.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected loading racks to demonstrate compliance with Conditions 5.5.1, 7.1.5, 7.1.6, 7.1.7 and 7.1.8, pursuant to Section 39.5(7) (b) of the Act:

- a. Throughput of gasoline, diesel, kerosene and propane (truck and railcar) [barrels or gallons/mo for gasoline, diesel and kerosene;
- b. Vapor pressure of the gasoline loaded (psia); and
- c. An up-to-date, readily accessible record of the continuous monitoring data required by 40 CFR 63.427(a). [Condition 7.1.8(a)] [40 CFR 63.428(c) (1)]

This record shall indicate the time intervals during which loading of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loading. This may be by exception, i.e., that no gasoline vapors were introduced into the combustion chamber of the VCU when there was no flame. The vapor bladder may allow gasoline to be loaded when there is no flame since the vapor bladder can store the vapors. Conversely, there must be a flame when the bladder is being emptied, even if no gasoline is being loaded.

- d. Records of the test results for each gasoline cargo tank loading at the terminal as follows:
 - i. Records of annual certification testing performed under 40 CFR 63.425(e) (1) and (2). [40 CFR 63.428(b) (1)]
 - ii. Records of continuous performance testing performed at any time at the terminal under 40 CFR 63.425(f), (g) and (h) as required by Conditions 8(b), (c), and (d), respectively. (40 CFR 63.428 (b) (2))
 - iii. An up-to-date documentation file for each gasoline cargo tank loading at the terminal, which file shall include, as a minimum the following information:
 - A. Name of each test for vapor tightness.
 - B. Cargo tank owner's name and address.
 - C. Cargo tank identification number.
 - D. Test location and date.
 - E. Tester name and signature.
 - F. Witnessing inspector, if any, with name, signature and affiliation.
 - G. Vapor tightness repair, with nature of repair work and when performed in relation to vapor tightness testing.
 - H. Test results with pressure or vacuum change in mm of water, time period of test, number of leaks found with instrument and leak definition.
- e. The following records with respect to leak detection and repair in a log book or computerized. [40 CFR 63.424(b) and 63.428(e)]
 - i. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.
 - ii. Records documenting each inspection which shall be signed by the owner or operator at the completion of each inspection.

- iii. Records for each leak that is detected, including the following:
 - A. The equipment type and identification number;
 - B. The nature of the leak, i.e., vapor or liquid, and the method of detection, i.e., sight, sound, or smell;
 - C. The date the leak was detected and the date of each attempt to repair the leak;
 - D. Repair methods applied in each attempt to repair the leak;
 - E. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
 - F. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
 - G. The date of successful repair of the leak.

- f. VOM and NO_x emissions (ton/mo and ton/yr).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected loading rack 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. The Permittee shall report pursuant to 40 CFR 63.10(e)(3) each exceedance or failure to maintain, as appropriate, the monitored operating parameter. [40 CFR 63.428(h)(1)]
 - i. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred.
 - ii. A description and timing of the steps taken to repair or perform maintenance on the vapor collection and combustion systems or the compliance monitoring system of Condition 7.1.8(a).

- b. The Permittee shall submit the following reports for gasoline cargo tanks loading at this terminal:
 - i. A semiannual report with every loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the terminal. [40 CFR 63.428(g)]
 - ii. An excess emissions report including the following information: (40 CFR 63.10(e)(3))
 - A. Each instance of a nonvapor-tight gasoline cargo tank loading at the terminal in which the owner or operator failed to take steps to assure that such cargo tank would not be reloaded at the terminal before vapor tightness documentation for that cargo tank was obtained. (40 CFR 63.428(h)(2))
 - B. Each reloading of a nonvapor-tight gasoline cargo tank at the terminal before vapor tightness documentation for that cargo tank is obtained by the terminal in accordance with 40 CFR 63.422(c)(2). (40 CFR 63.428(h)(3))
- c. The Permittee shall include in the excess emissions report required by 40 CFR 63.10(e)(3), each occurrence of an equipment leak for which no repair was made within 5 days or for which repair was not completed within 15 days after detection: (40 CFR 63.428(h)(4))
 - i. The date on which the leak was detected;
 - ii. The date of each attempt to repair the leak;
 - iii. The reasons for delay of repair; and
 - iv. The date of successful repair.
- d. The above reports may be submitted with the monitoring reports required by Condition 8.6.1.
- e. The Permittee shall report within 30 days any loading of gasoline into cargo tanks when the VCU was not operating.
- f. The Permittee shall report emissions in excess of the limits for VOM in Condition 7.1.6 within 30 days of a record showing such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected loading rack without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Diesel oil and kerosene may be loaded even if the VCU is not operating since the vapors from those materials are not required to be vented to the VCU by any regulation.

7.1.12 Compliance Procedures

- a. Compliance with the emission limits in Condition 5.5.1, 7.1.3 and 7.1.6 shall be based on the monitoring required by Condition 7.1.8, the recordkeeping required by Condition 7.1.9 and the reporting required by Condition 7.1.10.
- b. VOM emissions from gasoline loading shall be based on 10 mg/l times throughput in liters or the most recent compliance test information.
- c. For liquid products other than gasoline the formula in AP-42, Section 5.2.2, (January, 1995) shall be used, or updates thereof.
- d. NO_x emissions from the VCU shall be calculated using AP-42 emission factor of 0.068 lb/mmBtu from Industrial Flares, Section 13.5, Table 13.5-1.

7.2 Unit: Storage Tanks
Control: None

7.2.1 Description

The terminal has only one tank that is not classified as insignificant. It is used to store transmix. The gasoline that is loaded in tank trucks is located on the adjacent refinery.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
T-1	Transmix Storage Tank, Fixed Roof, 19,815 Gallons in Capacity	Submerged Loading Pipe

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected storage tank" for the purpose of these unit-specific conditions, is a storage tank identified in Condition 7.2.2.
- b. The affected storage tank is subject to the emission limits identified in Condition 5.2.2.
- c. The affected transmix storage tank is subject to 35 IAC 215.122(b) because it has a capacity greater than 250 gallons and used to store a volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

7.2.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected storage tank not being subject to the New Source Performance Standards (NSPS) for Storage Tanks, 40 CFR Part 60, Subpart Kb, because the affected tank was constructed prior to the applicable date.

7.2.5 Control Requirements

The affected tank shall be equipped and operated with a permanent submerged loading pipe, pursuant to 35 IAC 215.122(b). (The Illinois EPA has not approved use of other equivalent equipment in lieu of a permanent submerged loading pipe.)

7.2.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.2.7 Operating Requirements

None

7.2.8 Inspection Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected storage tank to demonstrate compliance with Conditions 5.5.1 and 7.2.5, pursuant to Section 39.5(7) (b) of the Act:

- a. Design information for the tank showing the presence of a permanent submerged loading pipe; and
- b. Maintenance and repair records for the tank, as related to the repair or replacement of the loading pipe.
- c. Readily accessible records showing the dimension of the storage vessel and an analysis showing that the capacity of the storage vessel is less than 75 m³. [40 CFR 60.116b(b)] If the capacity is over 75 m³ the tank is subject to the requirements of 40 CFR 60.112b.
- d. Throughput (gal/yr).
- e. VOM emissions (ton/yr).

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected storage tank 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. Any storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.2.5, e.g., no "permanent submerged loading pipe," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

- b. Any storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.2.5(a)) due to damage, deterioration, or other condition of the loading pipe, within 30 days of becoming aware of the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected storage tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.

7.2.12 Compliance Procedures

Emissions shall be calculated using the USEPA TANKS program or AP-42 emission factors.

7.3 Unit: Fugitives from Leaking Components
Control: None

7.3.1 Description

Fugitive emissions from equipment components, those not included in the loading rack emissions, such as valves, flanges,...etc., are generated during the processing of material through the piping distributed throughout the source.

7.3.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Equipment Components (Valves, Flanges, Pump Seals, Etc.)	Processing of Material Throughout the Source's Piping System	Work Practices and Equipment Replacement

7.3.3 Applicability Provisions

There are no general rules or regulations that address the operation of these emission units located at a petroleum bulk terminal. However, pursuant to 35 IAC 215.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of VOL with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions. Note that pursuant to Condition 5.10, the source is shielded from determining compliance with 35 IAC 215.142.

7.3.4. Non-Applicable Regulations

N/A

7.3.5 Control Requirements

None

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide limitations in Condition 5.5 that include the emissions from applicable units.

7.3.7 Operating Requirements

The Permittee shall repair any component from which a leak of VOL can be observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found. If the leaking component cannot be repaired until the process unit is shut down, the leaking component must then be repaired before the unit is restarted.

7.3.8 Inspection Requirements

The Permittee shall visually inspect for leaks from all affected equipment components on a monthly basis.

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the piping components at the source to demonstrate compliance with Condition 7.5.4 pursuant to Section 39.5(7)(b) of the Act.

- a. The number of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or vapor service, as applicable
- b. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.), tons/month and tons/year, with supporting calculations, calculated utilizing the compliance procedures in Condition 7.5.12 or other approved USEPA methodology;

7.3.10 Reporting Requirements

None

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to these units without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.3.12 Compliance Procedures

Compliance with the fugitive VOM emission requirements of Condition 5.4 and pursuant to the overall VOM emissions limitation of Condition 5.5 shall be demonstrated through the calculation of the following equation:

$$\text{Total Fugitive VOM Emissions (lb/hr)} = \sum_{i=1} EF_i \times N_i$$

Where:

EF_i = The specific component's (i.e., valves, pump seals, etc.) emission factor listed below. Emission factors found in "Protocol for Equipment Leak Estimates", EPA-453/R-95-017; and

Component	Light liquid ^a	Heavy liquid ^b	Vapor ^c
Connectors	1.76 x 10 ⁻⁵	Negligible	9.26 x 10 ⁻⁵
Valves	9.48 x 10 ⁻⁴	Negligible	2.87 x 10 ⁻⁴
Open-Ended Lines	2.87 x 10 ⁻⁴	Negligible	2.65 x 10 ⁻⁴
Pump Seals	1.19 x 10 ⁻³	Negligible	1.43 x 10 ⁻⁴
Other ^d	2.87 x 10 ⁻⁴	Negligible	2.65 x 10 ⁻⁴

^a Light liquid - not in gas/vapor service or heavy liquid service.;

^b Heavy liquid - material in a liquid state in which the with a vapor pressure less than or equal to 0.1 psia at 100° F

^c Vapor - material in a gaseous state at operating conditions; and

^d Other means any components other than connectors, valves, open-ended lines, and pump seals

N_i = Number of specific components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service as recorded in the records required in Condition 7.5.9.

Total annual emissions, in tons/year, shall be calculated by multiplying the hourly emission by 8760 hr/year.

Fugitive HAP emissions from equipment components, other than those included in the loading rack emissions, shall be determined by speciating the individual HAP emissions as a percentage of the gasoline and ethanol throughputs (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (c) above. Total fugitive HAP emissions will be based on the sum of the emissions for each individual HAP.

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 June 25, 2003 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

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

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. If a continuous monitor such as the flam detector does not actually record specific values but signals the operator of VOM vapors to the VCU, then a record (including hand records) of alarms is acceptable for this purpose. [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

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

9.14 Permit Expiration and Renewal

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

10.2 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
 - Do not violate any applicable requirement;
 - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Illinois EPA is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT,

as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control

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Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

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