

217/782-2113

"RENEWAL"  
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Illinois Department of Corrections  
Attn: David Menzel  
1301 Concordia Court  
Post Office Box 19277  
Springfield, Illinois 62794

I.D. No.: 087856AAA  
Application No.: 95060031

Date Received: August 29, 2006  
Date Issued: January 21, 2010  
Expiration Date: January 21, 2015

Operation of: Correctional Facility  
Source Location: Box 200, Route 146 East, Vienna, Johnson County, 62995  
Responsible Official: Steven K. White, Manager

This permit is hereby granted to the above-designated Permittee to OPERATE Vienna Correctional Facility, 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 Anatoly Belogorsky at 217/782-2113.

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

ECB:AB:psj

cc: Illinois EPA, FOS, Region 3  
CES  
Lotus Notes

<sup>1</sup> Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Vienna Correctional Center  
Box 200, Route 146 East  
Vienna, Illinois 62995  
618/658-8371

I.D. No.: 087856AAA  
County: Johnson  
Standard Industrial Classification: 9223, Correctional Institutions

1.2 Owner/Parent Company

Illinois Department of Corrections  
1301 Concordia Court  
P.O. Box 19277  
Springfield, Illinois 62794

1.3 Operator

Vienna Correctional Center  
Box 200, Route 146 East  
Vienna, Illinois 62995

Gary Carman  
618/658-8371

1.4 Source Description

Vienna Correctional Center is located at Route 146 East in Vienna, Illinois, and operates a power plant along with painting operations and gasoline storage tanks.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

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

- b. This permit contains Title I conditions that are newly established in this CAAPP permit, which conditions are specifically designated as "T1N".

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

### 3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

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

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

Boiler Coarse Bottom Ash Removal

- 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:

- a. 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)].
- b. 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)].
- c. 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). Note: These activities are not required to be individually listed.

### 3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

### 3.3 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

Description	Date Constructed	Emission Control Equipment	Subsection of this Permit
Coal-Fired Boilers #1 and #2	Prior to 1972	Two Baghouses	7.1
Coal and Fly Ash Handling Operations	2008	None	7.2
Natural Gas-Fired Boilers	1998	None	7.3
General Painting Operations and Coating Booths	N/A	Filters (Coating Booths)	7.4
Gasoline Storage Tanks	1998	None	7.5
Emergency Generator	N/A	None	7.6

## 5.0 OVERALL SOURCE CONDITIONS

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

- 5.1.1 a. This permit is issued based on the source requiring a CAAPP permit as a major source of SO<sub>2</sub> emissions.
- b. This source is a synthetic minor source for HAP emissions. Conditions 5.6.2 and 5.6.3 reflect this status by placing the certain emission limitations on HAP emission and production limits to support non-major HAP status of this source.

### 5.2 Area Designation

- 5.2.1 This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants (CO, lead, NO<sub>2</sub>, ozone, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>).

### 5.3 Source-Wide Applicable Provisions and Regulations

- 5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.
- 5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:
  - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
  - b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

#### 5.3.3 Ozone Depleting Substances

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

#### 5.3.5 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. This permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

5.3.6 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144 and is incorporated by reference into this permit.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.4 Source-Wide Non-Applicability of Regulations of Concern

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

5.5 Source-Wide Control Requirements and Work Practices

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

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	8.50
Sulfur Dioxide (SO <sub>2</sub> )	370.02
Particulate Matter (PM)	3.78

Pollutant	Tons/Year
Nitrogen Oxides (NO <sub>x</sub> )	31.09
HAP, not included in VOM or PM	3.7
Total	417.09

#### 5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions.

#### 5.6.3 Other Source-Wide Production and Emission Limitations

The total coal usage at the source shall not exceed 1,500 tons/month and 8,000 tons/year. This condition is established in conjunction with a synthetic minor limit established in Condition 5.6.2 above and pursuant to 39.5(7)(a) of the Act [T1N].

### 5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

- a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but

excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

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

#### 5.8 Source-Wide Monitoring Requirements

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

#### 5.9 Source-Wide Recordkeeping Requirements

##### 5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Conditions 5.6.1 and 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.2 Coal Usage Records

The Permittee shall maintain records of total monthly and annual coal usage in order to demonstrate compliance with Condition 5.6.3, Pursuant to Section 39.5(7)(b) of the Act.

##### 5.9.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

#### 5.10 Source-Wide Reporting Requirements

##### 5.10.1 General Source-Wide Reporting Requirements

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

deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

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

5.12 Source-Wide Compliance Procedures

5.12.1 General Procedures for Calculating Emissions

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

**6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS**

Not applicable to this source

**7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS**

7.1 Coal-Fired Boilers

7.1.1 Description

Two coal-fired boilers are used to produce steam and heat for facility's needs.

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

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coal-Fired Boilers	Boilers #1 and #2 (with a heat input 38.0 mmBtu/hr each boiler)	Prior to 1972; 2008 (Baghouses)	Two Baghouses

7.1.3 Applicable Provisions and Regulations

- a. The "affected coal-fired boilers" for the purpose of these unit-specific conditions, are emission units described in Conditions 7.1.1 and 7.1.2 above.
- b. No person shall cause or allow the emission of particulate matter into the atmosphere from any fuel combustion emission unit for which construction or modification commenced prior to April 14, 1972, using solid fuel exclusively, which is located outside the Chicago major metropolitan area, to exceed the limitations specified in the table below in any one hour period except as provided in 35 IAC 212.203:

H (Range) (mmBtu/hr)	S (lb/mmBtu)
Greater Than 10 But Smaller Than 250	$5.18H^{-0.715}$

Where:

S = Allowable emission standard in lb/mmBtu/hr of actual heat input; and

H = Actual heat input in mmBtu/hr [35 IAC 212.202].

- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any existing fuel combustion source with actual heat input less than, or equal to, 73.2 MW (250 mmBtu/hr), burning solid fuel exclusively, located outside the Chicago, St. Louis (Illinois) or Peoria major metropolitan areas, to exceed

10.5 kg of sulfur dioxide per MW-hr of actual heat input (6.8 lb/mmBtu) [35 IAC 214.142(a)].

- d. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- e. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122 [35 IAC 212.123(a)].
- f. Startup Provisions

Subject to the following terms and conditions, the Permittee is authorized to operate the affected coal-fired boilers in violation of the applicable standards in Condition 7.1.3(b) through (e) during startup. This authorization is provided pursuant to 35 IAC 201.149, 201.161 and 201.262, as the Permittee has applied for such authorization in its application, generally describing the efforts that will be used "...to minimize startup emissions, duration of individual starts, and frequency of startups." Also, this authorization is based on the applicable requirements of 35 IAC 229.130.

- i. This authorization does not relieve the Permittee from the continuing obligation to demonstrate that all reasonable efforts are made to minimize startup emissions, duration of individual startups and frequency of startups.
- ii. The Permittee shall conduct startup of each affected coal-fired boiler in accordance with written procedures prepared by the Permittee and maintained at the facility's control room of the affected coal-fired boilers, that are specifically developed to minimize emissions from startups and that include, at a minimum, the following measures:
  - A. The Permittee shall conduct startup of the affected coal-fired boilers in accordance with the manufacturer's written instructions or other written instructions prepared by the Permittee and maintained on site.
  - B. This authorization extends for a period of up to 4 hours required to achieve mandated minimum operating temperatures following initial firing of fuel during each startup event.

- iii. The Permittee shall fulfill applicable recordkeeping and reporting requirements of Condition 7.1.9 and 7.1.10.
- iv. As provided by 35 IAC 201.265, an authorization in a permit for excess emissions during startup does not shield a Permittee from enforcement for any violation of applicable emission standard(s) that occurs during startup and only constitutes a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all terms and conditions connected with such authorization.

g. Malfunction and Breakdown Provisions

Subject to the following terms and conditions, the Permittee is authorized to continue operation of the affected coal-fired boilers in violation of the applicable standards of Condition 7.1.3(b) through (d) in the event the loss of an induced draft fan, forced draft fan or malfunction of a coal stoker. This authorization is provided pursuant to 35 IAC 229.130, 201.149, 201.161 and 201.262, as the Permittee has applied for such authorization in its application, generally explaining why such continued operation would be required to provide essential service or to prevent risk of injury to personnel or severe damage to equipment, and describing the measures that will be taken to minimize emissions from any malfunctions and breakdowns. This authorization supersedes the general prohibition in Condition 9.2.3 against continued operation in such circumstances.

- i. This authorization only allows such continued operation as necessary to provide essential service or prevent risk of injury to personnel or severe damage to equipment and does not extend to continued operation solely for the economic benefit of the Permittee.
- ii. Upon occurrence of excess emissions due to malfunction or breakdown, the Permittee shall as soon as practical stop firing coal, repair the affected coal-fired boilers, remove the affected coal-fired boiler from service or undertake other action so that excess emissions cease. This shall be accomplished within 24 hours or noon of the Illinois EPA's next business day, whichever is greater, unless the Permittee obtains an extension from the Illinois EPA. The Illinois EPA may grant such extension if the Permittee demonstrates that the affected boiler(s) could not be reasonably repaired or removed from service within the allowed time and that, based on the actions which have been taken and will be taken, the Permittee is taking reasonable steps to minimize

excess emissions and will repair the affected boiler(s) or remove it from service as soon as practicable.

- iii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.1.9 and 7.1.10. For these purposes, time shall be measured from the start of a particular incident. The absence of excess emissions for a short period shall not be considered to end the incident if excess emissions resume. In such circumstances, the incident shall be considered to continue until corrective actions are taken so that excess emissions cease or the Permittee takes the affected coal-fired boilers out of service.
- iv. Following notification to the Illinois EPA of a malfunction or breakdown with excess emissions, the Permittee shall comply with all reasonable directives of the Illinois EPA with respect to such incident, pursuant to 35 IAC 201.263.
- v. This authorization does not relieve the Permittee from the continuing obligation to minimize excess emissions during malfunction or breakdown. As provided by 35 IAC 201.265, an authorization in a permit for continued operation with excess emissions during malfunction and breakdown does not shield the Permittee from enforcement for any such violation and only constitutes a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all terms and conditions connected with such authorization.

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.
- b. The affected coal-fired boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers do not have potential pre-control device emissions of PM10 that equals or exceeds major source threshold levels.

#### 7.1.5 Control Requirements and Work Practices

Pursuant to conditions of the construction permit 06070041, the Permittee shall:

- a. At all times, including periods of startup, shutdown, and malfunction, maintain and operate each baghouse in a manner consistent with good air pollution control practice to

protect and maintain the effectiveness of the baghouse for maximum PM emission reductions at all times. Permittee shall specify certain minimum operating and maintenance practices that must be implemented for this purpose.

- b. Operate and maintain each affected coal-fired boiler and associated baghouses in accordance with the PM control plan maintained by the Permittee pursuant to Condition 7.1.9. This plan shall include provisions to protect the baghouses from deterioration due to high temperatures, acid gas attack, fire, and other conditions or circumstances that would damage the baghouses.

#### 7.1.6 Production and Emission Limitations

See Condition 5.6.3 for coal usage limits.

#### 7.1.7 Testing Requirements

- a. Pursuant to 35 IAC 212.110 and Section 39.5(7)(b) of the Act, testing for PM emissions shall be performed as follows:
  - i. Measurement of particulate matter emissions from stationary emission units subject to 35 IAC Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E [35 IAC 212.110(a)].
  - ii. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4 [35 IAC 212.110(b)].
- b. Measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and 35 IAC 212.109, so as to demonstrate compliance with the emission limits in Condition 7.1.3(e).
- c. Emissions of PM from the affected coal-fired boilers and associated baghouses and opacity shall be tested once in five years prior to the expiration date of this permit and be submitted to the Illinois EPA. Testing shall be done in accordance with Conditions 7.1.7(a) and (b), 8.5 and 8.6 of this permit.

#### 7.1.8 Monitoring Requirements

Pursuant to the construction permit 06070041, the Permittee shall continuously monitor the following operating parameters of each baghouse [T1]:

- a. The temperature of the flue gas at the inlet of the baghouse (°F).

- b. The gas temperature adjacent to the shell of the baghouse.
- c. The pressure drop across the baghouse (inches of water).

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected coal-fired boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total coal usage (tons/mo and tons/yr);
- b. Sulfur content (wt.%) in the coal received;
- c. Records for Startups:
  - i. Records of the source's established startup procedures for affected boilers; and
  - ii. Records for each startup of an affected boiler that results in excess of opacity or regulated air pollution emissions.
- d. Records for Continued Operation during Malfunctions and Breakdowns:
  - i. A maintenance and repair log for each affected coal-fired boilers, listing each activity performed with date; and
  - ii. Records for each incident when operation of an affected boiler continued during malfunction or breakdown, including the following information:
    - A. Date and duration of malfunction or breakdown;
    - B. A description of the malfunction or breakdown;
    - C. The corrective actions used to reduce the quantity of emissions and the duration of the incident; and
    - D. If excess emissions occurred for four or more hours:
      - 1. An explanation why continued operation of the affected boiler was necessary;
      - 2. The preventive measures planned or taken to prevent similar malfunctions or

breakdowns or reduce their frequency and severity; and

3. An estimate of the magnitude of excess emissions during the incident.
- e. Records of the testing of the affected coal-fired boilers.
  - f. Records required by permit 06070041:
    - i. Logs for Baghouses:
      - A. An operating log or other records for the baghouse that, at a minimum: (1) Identifies the trigger for bag cleaning, e.g., manual, timer, or pressure drop; (2) Identifies each period of time when a boiler was in operation and the baghouse was not being operated or was not operating effectively; (3) Identifies each period when any baghouse module(s) have been taken out of regular service, with identification of the module(s) and explanation; and (4) Specifically documents the implementation of the operating procedures related to the baghouse that are required to be or are otherwise implemented pursuant to Condition 7.1.7.
      - B. An inspection log or other records for the baghouse that at a minimum: (1) Identify each inspection of the baghouse; (2) The observed condition of the baghouse; (3) A description of any maintenance or repair of the baghouse that is recommended as a result of the inspection and a review of outstanding recommendations for maintenance or repair from previous inspection(s), i.e., whether recommended action has been taken, is yet to be performed or no longer appears to be required.
      - C. Maintenance and repair log or other records for the baghouse that, at a minimum: (1) List the activities performed, with date and description, and (2) Specifically document the maintenance and repair activities related to the baghouse that are required to be or are otherwise performed pursuant to Condition 7.1.5(a).
    - ii. Records for PM Control Plan:
      - A. A record, which shall be kept up to date, identifying the specific operating procedures and maintenance practices (including procedures

and practices specifically related to startups and malfunction/breakdown incidents) currently being implemented by the Permittee for each affected boiler and associated baghouse to satisfy Conditions 7.1.5(a). These procedures and practices are referred to as the "PM control plan" in this permit.

- B. Accompanying this record, the Permittee shall maintain a demonstration showing that the above PM control plan fulfills the requirements of Condition 7.1.5(a) and (b), as applicable.
- C. Copies of the records required by Conditions 7.1.9(f)(ii)(A) and (B) shall be submitted to the Illinois EPA upon request.

iii. Records for Monitoring Instrumentation

The Permittee shall maintain following operating records for the monitoring instrumentation required by Condition 1.7(a) that, at a minimum, include:

- A. Measured data.
- B. Performance evaluations and other quality assurance/control activities, including calibration checks and maintenance and adjustment performed.
- C. Periods other than performance of routine quality assurance, calibration, and maintenance, as addressed above, when the monitor was inoperative, with reason.

iv. The Permittee shall maintain the following records for each incident when applicable action(s) required pursuant to the PM Control Plan were not taken for affected boiler(s):

- A. The date of the incident.
- B. A description of the incident, including the required action(s) that were not taken; other actions or mitigation measures that were taken, if any; and the likely consequences of the incidents as related to emissions.
- C. The time at and means by which the incident was identified.
- D. The length of time after the incident was identified before required action(s) were taken or were no longer required and an explanation

why this time was not shorter, including a discussion of the timing of any mitigation measures that were taken for the incident.

- E. The estimated total duration of the incident, i.e., the total length of time that the affected boiler ran without the required action(s) being taken.
- F. A discussion of the probable cause of the incident and any preventative measures taken.
- G. A discussion whether any applicable PM emission standards or limits may have been violated, either during or as a result of the incident, with supporting explanation.

- g. Emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.1.12.

#### 7.1.10 Reporting Requirements

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

##### a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected coal-fired 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:

- i. Emissions of regulated air pollutants from the affected coal-fired boilers in excess of the limits specified in Condition 7.1.3 within 30 days of such occurrence.
- ii. Operation of the affected coal-fired boilers and associated baghouses without monitoring operating parameters specified in Condition 7.1.8 within 30 days of such occurrence.

##### b. Reporting of Malfunctions and Breakdowns

The Permittee shall provide the following notification and reports to the Illinois EPA, Air Compliance Unit and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation of the affected coal-fired

boilers subject to Condition 7.1.3(g) during malfunction or breakdown:

- i.
  - A. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.
  - B. Upon achievement of compliance, the Permittee shall give a written follow-up notice within 15 days to the Illinois EPA, Air Compliance Unit and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the affected coal-fired boilers was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or when an affected coal fired boiler was taken out of service.
  - C. If compliance is not achieved within 5 working days of the occurrence, the Permittee shall submit interim status reports to the Illinois EPA, Air Compliance Unit and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the affected coal-fired boiler will be taken out of service.
- ii. In accordance with the due dates in Condition 8.6.1, the Permittee shall submit semi-annual malfunction and breakdown reports to the Illinois EPA pursuant to Sections 39.5(7)(a) and (f) of the Act. These reports may be submitted along with other semi-annual reports and shall include the following information for malfunctions and breakdowns of the affected coal-fired boilers during the reporting period:
  - A. A listing of malfunctions and breakdowns, in chronological order, that includes:
    - I. The date, time, and duration of each incident.

II. The identity of the affected operation(s) involved in the incident.

- B. Dates of the notices and reports of Conditions 7.1.10(b)(i).
- C. Any supplement information the Permittee wishes to provide to the notices and reports of Conditions 7.1.10(b)(i).
- D. The aggregate duration of all incidents during the quarter.
- E. If there have been no such incidents during the calendar quarter, this shall be stated in the report.

c. Reporting of Startups

In accordance with the due dates in Condition 8.6.1, the Permittee shall submit semi-annual startup reports to the Illinois EPA pursuant to Sections 39.5(7)(a) and (f) of the Act. These reports may be submitted along with other semi-annual reports and shall include the following information for startups of the affected coal-fired boilers during the reporting period:

- i. A list of the startups of the affected coal-fired boilers, including the date, duration and description of each startup, accompanied by a copy of the records pursuant to Condition 7.1.9(c) for each startup for which such records were required.
- ii. If there have been no startups of an affected coal-fired boilers during the reporting period, this shall be stated in the report.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected coal-fired boilers.

7.1.12 Compliance Procedures

- a. Compliance with emission limits of Condition 7.1.3 shall be based on the appropriate testing, monitoring, recordkeeping and reporting requirements as established in Conditions, 7.1.7, 7.1.8, 7.1.9 and 7.1.10 respectively.
- b. Compliance with the emission limits in Conditions 5.6.1 shall be based on the following emission factors derived from stack testing conducted in 1987 (for PM the most recent test was conducted in 2008).

Pollutant	Emission Factor (lb/ton or lb/mmBtu)
NO <sub>x</sub>	7.5
VOM	0.07
CO	6.0
SO <sub>2</sub>	38 x S (sulfur, wt.%)
PM	0.01185 lb/mmBtu (Boiler #1) 0.01455 lb/mmBtu (Boiler #2)

- c. Compliance with the emission limit for HCL in Condition 5.6.1 shall be based on AP-42 emission factor for coal-fired boilers (Table 1.1-15, September 1998) equal to 1.2 lb/ton of coal used.
- d. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.2 Coal and Fly Ash Handling Operations

7.2.1 Description

Coal is received, stored and transferred to the boilers. Fly ash (a by-product of coal burning) is transported, stored and load out into the trucks.

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

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coal and Fly Ash Handling Operations	Coal Handling: in-ground coal hopper; vibratory feeder; and enclosed conveyor for coal transfer	2008	None
	Fly Ash Handling: pneumatic ash transport piping; storage silos; a pug-mill mixture to wet ash prior to load out; and truck load out	2008	None Fabric Filter (storage silos)

7.2.3 Applicable Provisions and Regulations

- a. The "affected material handling operations" for the purpose of these unit-specific conditions, are the operations and/or emission units described in Conditions 7.2.1 and 7.2.2.
- b. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source [35 IAC 212.301].
- c. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
- d. Each affected material handling operation is subject to IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced on or after April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (see also Attachment 2) [35 IAC 212.321(a)].

#### 7.2.4 Non-Applicability of Regulations of Concern

- a. The affected material handling operations are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected operations are either:
  - i. For all operations (excluding fly ash storage silos), do not use an add-on control device to achieve compliance with an emission limitation or standard for regulated air pollutants; and
  - ii. For fly ash storage silos, do not have potential pre-control device emissions of PM<sub>10</sub> that equals or exceeds major source threshold levels.
- b. The affected material handling operations are not subject to requirements of 35 IAC 212.216 because of geographical location outside of those areas defined in 35 IAC 212.324(a)(1).

#### 7.2.5 Control Requirements and Work Practices

The Permittee shall maintain and repair all air pollution control equipment in a manner that assures that the emission limits and standards established in 35 IAC 212.321 shall be met at all times. Proper inspections and maintenance shall include the following minimum requirements pursuant to construction permit 07070053 and 39.5(7) of the Act:

- a. Inspections of the affected material handling operations, including air pollution control equipment, shall be conducted on the monthly basis when the affected units are in operation.
- b. Maintenance of an adequate inventory of spare parts.
- c. Maintenance and expeditious repair of control device(s) shall be performed to assure that such devices operated properly.

7.2.6 Production and Emission Limitations

- a. The affected material handling operations are subject to the following limits:
  - i. Emissions of PM from fly ash handling shall not exceed 3.4 lb/hr and 11.0 ton/yr.
  - ii. Emissions of PM from coal handling shall not exceed 0.5 lb/hr and 1.0 ton/yr.
- b. Compliance with annual limits shall be determined on a calendar year basis [T1].
- c. The above limitations were established in Permit 07070053, pursuant to PSD. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for PSD [T1].

7.2.7 Testing Requirements

- a. Opacity emission evaluation shall be conducted in accordance with procedures published in 40 CFR Part 60, Appendix A, Method 9.
- b. i. The Permittee shall have to measure the opacity of the emissions from the affected material handling operations during representative weather and operating conditions determined by a qualified observer in accordance with USEPA Test Method 9, as further specified below, pursuant to Section 39.5(7)(d) of the Act.
  - A. For each affected operation, testing shall be conducted at least annually.
  - B. Upon written request by the Illinois EPA, such testing shall be conducted for specific affected operation(s) within 45 calendar days of the request or on the date agreed upon by the Illinois EPA, whichever is later.
- ii. The duration of opacity observations for each test shall be at least 30 minutes (five 6-minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both less than 20.0 percent.
- c. The above testing conditions are established in accordance with 39.5(7)(d) and 39.5(7)(p) of the Act.

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected material handling operations.

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected material handling operations, pursuant to Sections 39.5(7)(a) and (e) of the Act:

- a. Records of the performed inspections:
  - i. Date and time the inspection was performed with name(s) of inspection personnel.
  - ii. The observed conditions of the material handling units, including air pollution control equipment.
  - iii. A description of any maintenance or repairs recommended as a result of inspections and a review of outstanding recommendations for maintenance or repair from previous inspection(s).
- b. Maintenance and repair logs for an air pollution control equipment.
- c. The Permittee shall maintain records of the amount of coal received/processed at the source (tons/month and tons/year) and fly ash processed (tons/month and tons/year).
- d. Records of emissions of the affected material handling operations, as calculated in accordance with requirements outlined in Condition 7.2.12.
- e. The Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9 for the affected operations that it conducts or that are conducted at its behest by individuals who are qualified to make such observations. For each occasion on which such measurements are made, these records shall include the formal report for the measurements if conducted pursuant to Condition 7.2.7, or otherwise the identity of the observer, a description of the measurements that were made, the operating condition of the affected operations, the observed opacity, and copies of the raw data sheets for the measurements.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected material handling operations with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable

cause of such deviations, and any corrective actions or preventive measures taken:

- a. Emissions of PM in excess of the limits specified in Conditions 7.2.3 and 7.2.6 within 30 days of such occurrence.
- b. Opacity in excess of the limit specified in Condition 7.2.3(c) within 30 days of such occurrence.
- c. All other deviations not specifically addressed by Section 7.2.11 shall be reported in the semi-annual reports [39.5(7)(b) and (f) of the Act].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected material handling operations.

7.2.12 Compliance Procedures

- a. Compliance with the numerical emission limits of Condition 7.2.3 shall be achieved by the inspection and maintenance requirements of Condition 7.2.5, testing requirements of Condition 7.2.7, recordkeeping requirements of Condition 7.2.9 and reporting requirements of Condition 7.2.10.
- b. Emissions from the affected material handling operations shall be calculated as follows:

$$\text{PM/PM}_{10} \text{ Emissions}^* = (\text{Air flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Filter Efficiency } \%) / 100].$$

- \* As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP-42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

- c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.3 Natural Gas-Fired Boilers

7.3.1 Description

Four natural gas-fired boilers supply heat and power for the needs of this source

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

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Natural Gas-Fired Boilers (4 units)	Maximum heat input capacity 6.3 mmBtu/hr each	1998	None

7.3.3 Applicable Provisions and Regulations

- a. The "affected boilers" for the purpose of these unit-specific conditions, are the natural gas-fired boilers described in Conditions 7.3.1 and 7.3.2 above.
- 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 35 IAC 212.122 [35 IAC 212.123(a)].

7.3.4 Non-Applicability of Regulations of Concern

- a. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.
- b. The affected boilers are not subject to 35 IAC 216.121, because heat input capacity of each of these boilers is less than 10 mmBtu/hr.
- c. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, does not apply to the affected boilers with a maximum heat input capacity of less than 10 mmBtu/hr.
- d. The affected boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boilers do not use an add-on control device.

7.3.5 Control Requirements and Work Practices

- a. Each affected boiler shall only be operated with natural gas as the fuel.
- b. Each affected boiler shall be operated in accordance with a manufacturer's manual and/or standard operating procedures for affected boilers.
- c. These conditions are established pursuant to Section 39.5(7)(a) of the Act.

7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected boilers are subject to the following:

- a. Total natural gas consumption shall not exceed 22.0 mmscf/month and 220.0 mmscf/year.
- b. Emissions shall not exceed the following limits:

<u>Pollutant</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
NO <sub>x</sub>	1.1	11.0
CO	0.92	9.2
PM	0.08	0.8
VOM	0.06	0.6

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

These limits are based on the maximum operating rate and standard emission factors established in AP-42.

- c. The above limitations were established in initial CAAPP Permit 95060031, pursuant to PSD [T1].

7.3.7 Testing Requirements

Testing requirements are not set for the affected boilers.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected boilers.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the

affected boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for the affected boilers (mmscf/mo and mmscf/yr); and
- b. Monthly and annual emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.3.12.

7.3.10 Reporting Requirements

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

Reporting of Deviations

- a. Emissions of regulated air pollutants from the affected boilers in excess of the limits specified in Condition 7.3.3 within 30 days of such occurrence.
- b. Operation of the affected boilers in excess of production and emission limits specified in Condition 7.3.6 within 30 days of such occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boilers.

7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(b) is addressed by the normal work practices and maintenance activities required in Condition 7.3.5 and the records and reports required in Conditions 7.3.9 and 7.3.10.
- b. Compliance with the emission limits in Conditions 5.6 and 7.3.6(b) is addressed by the records and reports required in Conditions 7.3.9 and 7.3.10 and the emission factors and formulas listed below:

- i. Emission factors for the affected boilers:

<u>Pollutant</u>	<u>Emission Factors</u> <u>lb/10<sup>6</sup> scf natural gas used</u>
PM	7.6
NO <sub>x</sub>	100.0
VOM	5.5
CO	84.0
SO <sub>2</sub>	0.6

The emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, March 1998.

ii. Emission formula for the affected boilers:

(Emissions, lb) = (The Appropriate Emission Factor, lb/10<sup>6</sup> scf) x Natural Gas Usage (10<sup>6</sup> scf)

- c. Compliance with the production limits in Condition 7.3.6(a) shall be based on the recordkeeping requirements of Condition 7.3.9(a).
- d. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.4 General Painting Operations and Coating Booths

7.4.1 Description

General maintenance painting and metal furniture coating is performed at this location.

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

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coating Operations	Three (3) Coating Booths for the Metal Furniture Coating Application	1998	Filters

7.4.3 Applicable Provisions and Regulations

- a. The "affected coating operations" for the purpose of these unit-specific conditions, are the operations described in Conditions 7.4.1 and 7.4.2 above.
- 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 source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of Subpart K shall apply only to photochemically reactive material [35 IAC 215.301].
- c. The affected coating operations are subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.4.4 Non-Applicability of Regulations of Concern

- a. Metal furniture coating performed at this source is not subject to limitations of 35 IAC 215.204(g) as a consequence of the annual VOM emission limit from all coating operations established in Condition 7.4.6 and 25

ton of VOM per year as an exemption criteria, pursuant to 35 IAC 215.206(a)(1).

- b. This permit is issued based on the affected coating operation not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating operation does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.4.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected coating operations.

7.4.6 Production and Emission Limitations

- a. In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected coating operations are subject to the following:

VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
2.0	20.0

- a. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- b. The above limitations were established in initial CAAPP Permit 95060031, pursuant to PSD and avoidance of 35 IAC 215.204 [T1].

7.4.7 Testing Requirements

- a. The applicable testing of VOM content in applied coatings, as described below, should be performed once in five years at the time of renewal of this CAAPP permit.
- b. Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 215.205(a) and Section 39.5(7)(b) of the Act]:

The VOM content of coatings shall be determined by Method 24, 40 CFR Part 60, Appendix A, incorporated by reference in Section 215.105 except for glues and adhesive coatings, two component reactive coatings forming volatile reaction products, coatings requiring energy other than heat to initiate curing, and coatings requiring high temperature catalysis for curing, providing the person proposing testing of the material submits to the Agency proof that

the Method 24 results would not be representative and proof that a proposed alternative test method gives representative, accurate test results.

- c. Such testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.4.9 directly reflect the application of such material and separately account for any additions of solvent.

#### 7.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected coating operations.

#### 7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected coating operations to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Coatings:
  - i. The usage of each coating, in units of gallons/month and gallons/year.
  - ii. Density of each coating in units of lb/gallon.
  - iii. VOM content of each coating in weight percent.
- b. Cleanup solvents:
  - i. VOM content of each cleanup solvent used in lbs/gal.
  - ii. Amount of each cleanup solvent used in gal/month and gal/year.
- c. Total monthly/annual VOM emissions from the affected coating operations calculated in accordance with compliance procedures of Condition 7.4.12.
- d. Records of the testing of VOM content (wt. %) of each coating and cleaning solvent as tested pursuant to the conditions of this section, which include the following [Section 39.5(7)(e) of the Act]:
  - i. Identification of material tested;
  - ii. Results of analysis;
  - iii. Documentation of analysis methodology; and

- iv. Person performing analysis.

7.4.10 Reporting Requirements

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

Reporting of Deviations

- a. Emissions of regulated air pollutants from the affected coating operations in excess of the limits specified in Condition 7.4.3 within 30 days of such occurrence.
- b. Operation of the affected coating operations in excess of emission limits specified in Condition 7.4.6 within 30 days of such occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected coating operations.

7.4.12 Compliance Procedures

- a. Compliance with Conditions 7.4.3 is addressed by testing requirements in Condition 7.4.7 and the records and reports required in Conditions 7.4.9 and 7.4.10.
- b. Compliance with the emission limits in Conditions 5.6 and 7.4.6 is addressed by testing requirements in Condition 7.4.7, the records and reports required in Conditions 7.4.9 and 7.4.10 and the formulas listed below:

Emissions from Coating Operation (EI) = Actual Coating Usage (gal/mo) x Coating Density (lb/gal) x VOM Content of the Coating (wt.%);

Emissions from Cleanup Operation (EII) = (Actual Clean-up Solvent Usage (gal/mo) x Solvent Density (lb/gal)); and

Total VOM Emissions = EI + EII

- c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.5 Gasoline Storage Tanks

7.5.1 Description

Three (3) gasoline storage tanks are associated with gasoline non-retail dispensing operations for correctional center vehicles.

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

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Gasoline Storage Tanks	4,500 Gallon Capacity; 560 Gallon Capacity; and 10,000 Gallon Capacity (all equipped with Submerged Loading Pipes)	1998	None

7.5.3 Applicable Provisions and Regulations

- a. The "affected gasoline storage tank" for the purpose of these unit-specific conditions, is a gasoline storage tank described in Conditions 7.5.1 and 7.5.2 above.
- b. The affected gasoline storage tanks are subject to the following:
  - i. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 215.122(b)]
  - ii. 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 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall only apply to photochemically reactive material [35 IAC 215.301].

7.5.4 Non-Applicability of Regulations of Concern

- a. The affected gasoline storage tank is not subject to the requirements of 35 IAC 215.583(a)(2), because this tank is

located outside designated counties, as determined in 35 IAC 215.583(b)(4).

- b. This permit is issued based on the affected gasoline storage tank not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected storage tank does not use an add-on control device to achieve compliance with an emission limitation or standard

7.5.5 Control Requirements and Work Practices

- a. Each affected gasoline storage tank shall be equipped with a permanent submerged loading pipe and no operations are allowed without this device.
- b. Proper connection and operation of each permanent submerged loading pipe should be verified by quarterly inspections conducted on the regular basis.
- c. These conditions are established pursuant to 35 IAC 215.122(b) and 39.5(7)(d) of the Act.

7.5.6 Production and Emission Limitations

Production and emission limitations are not set for the affected gasoline storage tanks.

7.5.7 Testing Requirements

Testing requirements are not set for the affected gasoline storage tanks.

7.5.8 Monitoring Requirements

Monitoring requirements are not set for the affected gasoline storage tanks.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected gasoline storage tanks to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Readily accessible records of dimensions and analysis of the capacity of the storage tank;
- b. Monthly and annual gasoline throughput (gallons/month and gallons/year);
- c. Records of quarterly inspections required by Condition 7.5.5; and

- d. Total VOM emissions from the affected gasoline storage tanks calculated in accordance with compliance procedures of Condition 7.5.12.

7.5.10 Reporting Requirements

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

Reporting of Deviations

Operation of the affected gasoline storage tanks without submerged loading pipe as specified in Condition 7.5.3(b) within 30 days of such occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected gasoline storage tanks.

7.5.12 Compliance Procedures

- a. Compliance with Condition 7.5.3(b) shall be determined by inspection requirements specified in Condition 7.5.5.
- b. To determine compliance with Conditions 5.6 emissions from the affected gasoline storage tank shall be calculated based on the current version of the TANKS program.
- c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

7.6 Emergency Generator

7.6.1 Description

Emergency diesel fired internal combustion generator is used for electricity generation during power outages.

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

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Emergency Generator	One Internal Combustion Engine (14.5 mmBtu/hr or 2682 hp/hr)	N/A	None

7.6.3 Applicable Provisions and Regulations

- a. The "affected diesel generator" for the purpose of these unit-specific conditions, is a generator described in Conditions 7.6.1 and 7.6.2 above.
- b. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hour (8 lb/hour) from an affected diesel generator, except as provided in 35 IAC 215.302, 215.303, or 215.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall only apply to photochemically reactive material [35 IAC 215.301].
- c. The affected diesel generator is subject to the following:
  - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122.
  - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minutes period, provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1,000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such emission unit shall be limited to 3 times in any 24 hours [35 IAC 212.123].

- d. i. The affected diesel generator is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines 40 CFR Part 63, Subpart ZZZZ, because the affected diesel generator stationary RICE at a major or area source of HAP emissions, pursuant to 40 CFR 63.6580.
- ii. Pursuant to 40 CFR 63.6590(a)(1)(iii), the affected diesel generator is existing stationary RICE located at an area source of HAP emissions because the affected engines commenced construction or reconstruction before June 12, 2006 and the source is not a major source of HAP emissions pursuant to Condition 5.6.2.

Note: The Permittee has certified that the affected engines have not been modified or reconstructed after June 12, 2006.

- iii. Pursuant to 40 CFR 63.6590(b)(3), existing compression ignition (CI) stationary RICE do not have to meet the requirements of 40 CFR Part 63, Subpart ZZZZ or Subpart A. No initial notification is necessary.

#### 7.6.4 Non-Applicability of Regulations of Concern

- a. The affected diesel generator is not subject to the requirements of 35 IAC 212.321 because it does not have a process weight rate as defined in 35 IAC 211.5250.
- b. The affected diesel generator is not subject to the New Source Performance Standards (NSPS) for Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII, because the Permittee did not commence construction (date the engine is ordered by the Permittee) of the affected engines after July 11, 2005 and did not modify or reconstruct the affected engines after July 11, 2005, pursuant to 40 CFR 60.4200(a)(2) and 60.4200(a)(3).

Note: The Permittee has certified that the affected engines do not constructed after July 11, 2005 and have not been modified or reconstructed after July 11, 2005.

- c. This permit is issued based on the affected diesel generator not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected diesel generator does not use an add-on control device to achieve compliance with an emission limitation or standard

7.6.5 Control Requirements and Work Practices

- a. The affected diesel generator shall only be operated with a diesel as the fuel.
- b. The affected diesel generator shall be operated in accordance with manufacturer's specifications and/or manuals.
- c. These conditions are established pursuant to 39.5(7)(d) of the Act.

7.6.6 Production and Emission Limitations

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

- a. Maximum hours of operation per month and/or per year: 487
- b. Total emissions shall not exceed the following limits:

<u>Pollutant</u>	<u>Tons/Month</u>	<u>Tons/Year</u>
NO <sub>x</sub>	15.67	15.67
CO	3.59	3.59
SO <sub>2</sub>	2.11	2.11

- c. These limits are based on the maximum operating rate and standard emission factors established in AP-42, Table 3.4-1 for large stationary diesel engines. Sulfur % in diesel fuel is assumed 0.4.
- d. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].
- e. The above limitations were established in initial CAAPP Permit, pursuant to PSD [T1].

7.6.7 Testing Requirements

Testing requirements are not set for the affected diesel generator.

7.6.8 Monitoring Requirements

Monitoring requirements are not set for the affected diesel generator.

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected diesel generator to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Hours of operation (hr/mo and hr/yr);
- b. Manufacturer's specifications and/or manuals of operation; and
- c. Emissions from the affected diesel generator calculated in accordance with compliance procedures of Condition 7.6.12.

7.6.10 Reporting Requirements

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

Reporting of Deviations

- a. Emissions of regulated air pollutants from the affected diesel generator in excess of the limits specified in Condition 7.6.3 within 30 days of such occurrence.
- b. Operation of the affected diesel generator in excess of emission limits specified in Condition 7.6.6 within 30 days of such occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected diesel generator.

7.6.12 Compliance Procedures

- a. Compliance with Condition 7.6.3(b) and (c) shall be determined by requirements specified in Condition 7.6.5.
- b. Compliance with the emission limits in Conditions 5.6.2 and 7.6.6 is addressed by the recordkeeping and reporting established in Conditions 7.6.9 and 7.6.10 and the following emission factors listed below:

Pollutant	Emission Factor (lb/hp-hr)
NO <sub>x</sub>	0.024
SO <sub>2</sub>	0.00809 "S"
CO	0.0055

"S" = % sulfur in diesel fuel

These are the emission factors established for large stationary diesel and all stationary dual-fuel engines, Tables 3.4-1, AP-42, October 1996.

- c. The conditions described above are established in accordance with provisions 39.5(7) of the Act.

## 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 October 1, 2009, unless this permit has been modified to reflect such new requirements.

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

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

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

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

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

## 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, pursuant to Condition 7.1.10(a)(iii):

Monitoring Period

Report Due Date

September 16 - March 15

Within 60 days after the reporting period

March 16 - September 15

Within 60 days after the reporting period

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

8.6.2 Test Notifications

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

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

8.6.3 Test Reports

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

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

#### 8.6.4 Reporting Addresses

- a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

- Illinois Environmental Protection Agency  
Bureau of Air  
Compliance & Enforcement Section (MC 40)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Quality Planning Section

- Illinois Environmental Protection Agency  
Bureau of Air  
Air Quality Planning Section (MC 39)  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

iv. USEPA Region 5 - Air Branch

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

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

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
1021 North Grand Avenue East  
P.O. Box 19506  
Springfield, Illinois 62794-9506

8.7 Title I Conditions

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

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

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

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

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

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

practices, or operations regulated or required under this permit;

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

#### 9.4 Obligation to Comply with Other Requirements

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

#### 9.5 Liability

##### 9.5.1 Title

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

##### 9.5.2 Liability of Permittee

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

##### 9.5.3 Structural Stability

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

##### 9.5.4 Illinois EPA Liability

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

##### 9.5.5 Property Rights

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

## 9.6 Recordkeeping

### 9.6.1 Control Equipment Maintenance Records

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

### 9.6.2 Records of Changes in Operation

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

### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

## 9.7 Annual Emissions Report

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

## 9.8 Requirements for Compliance Certification

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

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

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

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

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

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

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

##### 9.10.2 Emergency Provision

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

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

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

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

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

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

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

#### 9.11 Permanent Shutdown

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

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

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

##### 9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

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

#### 9.12.3 Inaccurate Application

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

#### 9.12.4 Duty to Provide Information

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

#### 9.13 Severability Clause

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

#### 9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

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

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

9.15 General Authority for the Terms and Conditions of this Permit

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

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

**10.0 ATTACHMENTS**

Attachment 1 Example Certification by a Responsible Official

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

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Attachment 2 Emissions of Particulate Matter from Process Emission Units

Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].
- b. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
  - i. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

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

Where:

P = Process weight rate

E = Allowable emission rate

- ii. For process weight rates of 408 Mg/hr (450 T/hr):

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

- iii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

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

Attachment 3 - Compliance Assurance Monitoring (CAM) Plan

Not applicable to this source

Attachment 4 Guidance

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

Guidance On Revising A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-revising.pdf](http://www.epa.state.il.us/air/caapp/caapp-revising.pdf)

Guidance On Renewing A CAAPP Permit:

[www.epa.state.il.us/air/caapp/caapp-renewing.pdf](http://www.epa.state.il.us/air/caapp/caapp-renewing.pdf)

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

[www.epa.state.il.us/air/caapp/index.html](http://www.epa.state.il.us/air/caapp/index.html)

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

[www.epa.state.il.us/air/caapp/199-caapp.pdf](http://www.epa.state.il.us/air/caapp/199-caapp.pdf)

[www.epa.state.il.us/air/permits/197-fee.pdf](http://www.epa.state.il.us/air/permits/197-fee.pdf)

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