

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Nabisco Biscuit Company  
Attn: Dan Kiedrow  
7300 South Kedzie Avenue  
Chicago, Illinois 60629-3534

Application No.: 96030141                      I.D. No.: 031600CAO  
Applicant's Designation:                      Date Received: March 7, 1996  
Operation of: Bakery  
Date Issued: May 15, 2000                      Expiration Date<sup>2</sup>: May 15, 2005  
Source Location: 7300 South Kedzie Avenue, Chicago, Cook County  
Responsible Official: John Borman, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a bakery, 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 Bill Marr at 217/782-2113.

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

DES:WDM:jar

cc: Illinois EPA, FOS, Region 1

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

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Nabisco Biscuit Company  
7300 South Kedzie Avenue  
Chicago, Illinois 60629-3534  
312/925-4300

I.D. No.: 031600CAO  
Standard Industrial Classification: 2052, Bakery, Cookies and  
Crackers

1.2 Owner/Parent Company

Nabisco, Inc.  
200 DeForest Avenue  
East Hanover, New Jersey 07936-1944

1.3 Operator

Nabisco Biscuit Company  
7300 South Kedzie Avenue  
Chicago, Illinois 60629-3534

Dan Kiedrow  
773/918-8176

1.4 General Source Description

The Nabisco Biscuit Company is located at 7300 South Kedzie Avenue, Chicago. The source is a bakery that produces cookies and crackers.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

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
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft <sup>3</sup>	cubic foot
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
Mg	Megagram
mmBtu	Million British thermal units
mmft <sup>3</sup>	Million cubic foot
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	parts per million
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 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:

Sugar/flour unloading systems with baghouses. The baghouses used on the sugar/flour unloading systems are considered to be inherent control of the process equipment.

Central bin dust return systems with baghouses. The baghouses used on the central bin dust return systems are considered to be inherent control of the process equipment.

Dough mixers with baghouses. The baghouses used on the dough mixers are considered to be inherent control of the process equipment.

Sugar handling system with filters. The filters used on the sugar handling system are considered to be inherent control of the process equipment.

Pulverized sugar transfer with baghouses and cyclone. The baghouses and cyclone used on the pulverized sugar transfer are considered to be inherent control of the process equipment.

Railcar unloading and transfer system with baghouses. The baghouses used on the railcar unloading and transfer system are considered to be inherent control of the process equipment.

Central bins flour transfer with baghouses. The baghouses used on the central bins flour transfer are considered to be inherent control of the process equipment.

Central bins sugar/flour pneumatic conveying with baghouse. The baghouse used on the central bins sugar/flour pneumatic conveying is considered to be inherent control of the process equipment.

Flour weigh hoppers with baghouses. The baghouses used on the flour weigh hoppers are considered to be inherent control of the process equipment.

Fugitive PM emissions from vehicle traffic on paved roads.

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:

Sugar/flour transfer systems with baghouses. The baghouses used on the sugar/flour transfer systems are considered to be inherent control of the process equipment.

Flour truck unloading system with baghouse. The baghouse used on the flour truck unloading system is considered to be inherent control of the process equipment.

Sugar pulverizer with baghouse. The baghouse used on the sugar pulverizer is considered to be inherent control of the process equipment.

Sandwich cookie bin with baghouse. The baghouse used on the sandwich cookie bin is considered to be inherent control of the process equipment.

Sugar weigh hoppers with baghouse. The baghouse used on the sugar weigh hoppers is considered to be inherent control of the process equipment.

Flour transfer system with filters. The filters used on the flour transfer system are considered to be inherent control of the process equipment.

Flour scaling system with filters. The filters used on the flour scaling system are considered to be inherent control of the process equipment.

Sugar transfer system with filters. The filters used on the sugar transfer system are considered to be inherent control of the process equipment.

Sugar scaling system with filters. The filters used on the sugar scaling system are considered to be inherent control of the process equipment.

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

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

Equipment used for filling drums, pails, or other packaging containers, excluding aerosol cans, with soaps, detergents, surfactants, lubricating oils, waxes, vegetable oils, greases, animal fats, glycerin, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(8)].

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)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

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

### 3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Natural Gas Fired Boiler #3	1951	None
02	Natural Gas Fired Straight Dough Baking Oven #1	1952	None
	Natural Gas Fired Straight Dough Baking Oven #2	1952	None
	Natural Gas Fired Straight Dough Baking Oven #3	1952	None
	Natural Gas Fired Straight Dough Baking Oven #4	1952	None
	Natural Gas Fired Straight Dough Baking Oven #5	1952	None
	Natural Gas Fired Straight Dough Baking Oven #6	1952	None
	Natural Gas Fired Straight Dough Baking Oven #9	1952	None
	Natural Gas Fired Straight Dough Baking Oven #10	1952	None
	Natural Gas Fired Straight/Medium Sponge Dough Baking Oven #11	1952	None
	Natural Gas Fired Straight Dough Baking Oven #12	1952	None
	Natural Gas Fired Straight Dough Baking Oven #13B	1963	None
	Natural Gas Fired Straight Dough Baking Oven #14	1963	None
	Natural Gas Fired Straight Dough Baking Oven #15	1963	None
	Natural Gas Fired Straight/Medium Sponge Dough Baking Oven #16	1963	None
	Natural Gas Fired Straight Dough Baking Oven #17	1963	None
	Natural Gas Fired Straight Dough Baking Oven #18	1963	None
	Natural Gas Fired Straight Dough Baking Oven #22	1963	None
03	Natural Gas Fired Sponge Dough Baking Oven #7	1952 (Oven)	Natural Gas Fired Catalytic Oxidizer
	Natural Gas Fired Sponge Dough Baking Oven #8	1952 (Oven) May 2000 (Oxidizer)	
04	Natural Gas/Distillate Fuel Oil Fired Boiler #4	1961	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
05	Natural Gas/Distillate Fuel Oil Fired Boiler #5	1974	None
	Natural Gas/Distillate Fuel Oil Fired Boiler #1	June 1979	None
06	Natural Gas Fired Straight/Medium Sponge Dough Baking Oven #13A	December 1978	None
Fugitive VOM Emissions	Methyl Bromide Fumigation	-	None

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM, SO<sub>2</sub>, and NO<sub>x</sub> emissions.

5.1.2 This permit is issued based on the source not being a major source of HAPs.

### 5.2 Applicable Regulations

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

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

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

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b.
  - i. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].
  - ii. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
  - iii. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical

dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

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

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

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

5.2.4 Risk Management Plan

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

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

compliance certification required by 40 CFR Part 70 or 71.

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

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
- i. Illinois EPA, Compliance Section; and

- ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
- iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	389.20
Sulfur Dioxide (SO <sub>2</sub> )	204.10
Particulate Matter (PM)	19.13
Nitrogen Oxides (NO <sub>x</sub> )	180.31
HAP, not included in VOM or PM	----
TOTAL	792.74

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per

year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

#### 5.5.3 Other Source-Wide Emission Limitations

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

### 5.6 General Recordkeeping Requirements

#### 5.6.1 Emission Records

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

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

#### 5.6.2 Retention and Availability of Records

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

### 5.7 General Reporting Requirements

#### 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the source with the permit requirements as follows, pursuant to Section

39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1, within 30 days of such an occurrence.

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Permitted Emissions

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

## 6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

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

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

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

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

### 6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

### 6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
  - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

### 6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).
- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

#### 6.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

## 6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
  - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

## 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
  - i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
  - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the

associated emergency conditions report that has been approved by the Illinois EPA;

- v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
  - vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.
- b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

#### 6.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 723 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 82.0409 tons per season.
    - A. This determination includes the use of 1995 and 1996 as baseline seasons.
  - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.
  - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period during issuance and, if not retired in this season, the next seasonal allotment period.
  - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period during the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Natural Gas Fired Catalytic Oxidizer	00040070	May 12, 2000

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

- i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
- ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Natural Gas Fired Boiler #3.

Natural Gas/Distillate Fuel Oil Fired Boiler #4.

Natural Gas/Distillate Fuel Oil Fired Boiler #5.

Natural Gas/Distillate Fuel Oil Fired Boiler #1.

b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 Natural Gas Fired Boiler

7.1.1 Description

This boiler is used for the production of steam for space heating. The boiler does not utilize any emission control equipment. The boiler burns natural gas as the fuel.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
01	Natural Gas Fired Boiler #3	34	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected boiler" for the purpose of these unit-specific conditions, is a Natural Gas Fired Boiler, for which construction, modification, or reconstruction commenced before June 9, 1989, with actual heat input greater than 2.9 MW (10 mmBtu/hr) and less than 29 MW (100 mmBtu/hr), and burns natural gas exclusively.
- b. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].
- c. The affected boiler is subject to the emission limits identified in Condition 5.2.2(c).

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected boiler not being subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units for which construction, modification, or reconstruction was commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 MW (100 mmBtu/hr) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr), 40 CFR Part 60, Subpart Dc, because the affected boiler was constructed prior to June 9, 1989.

- b. This permit is issued based on the affected boiler not being subject to 35 IAC 217.141, Existing Fuel Combustion Emission Units in Chicago Major Metropolitan Areas, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).
- c. This permit is issued based on the affected boiler not being subject to 35 IAC 218.301 and 218.302, Use of Organic Material, because the provisions of 35 IAC 218.301 and 218.302 shall not apply to fuel combustion emission units, pursuant to 35 IAC 218.303.

7.1.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected boiler.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boiler is subject to the following:

N/A

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

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

- a. Natural gas consumption (mmft<sup>3</sup>/month and mmft<sup>3</sup>/year); and
- b. Monthly and annual aggregate NO<sub>x</sub>, CO, PM, and VOM emissions, based on natural gas consumption and the applicable emission factors from Condition 7.1.12(b), with supporting calculations (ton/month and ton/year).

7.1.10 Reporting Requirements

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

The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected boiler.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

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

- a. Compliance with the emission limits in Conditions 7.1.3(b) and (c) is assumed to be achieved under inherent operating conditions of an affected boiler, so that no compliance procedures are set in this permit addressing these requirements.
- b. Compliance with the emission limits in Condition 5.5.1 from the affected boiler shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	140
CO	35
PM	14
VOM	5.8

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers with heat input greater than 10 mmBtu/hr and less than 100 mmBtu/hr, Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement B, October, 1996.

Boiler Emissions (ton) = (Natural gas consumption, mmft<sup>3</sup>) x (the applicable emission factor, lb/mmft<sup>3</sup>) x (ton/2000 lb)

7.2 Unit 02 Existing Natural Gas Fired Baking Ovens

7.2.1 Description

These baking ovens are used to produce cookies and crackers. Bakery products that contain yeast as an ingredient generate ethanol, a VOM, which is released during the baking process. The baking ovens do not utilize any emission control equipment. Each baking oven burns natural gas as the fuel.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
02	Natural Gas Fired Straight Dough Baking Oven #1	6.5	None
	Natural Gas Fired Straight Dough Baking Oven #2	6.5	None
	Natural Gas Fired Straight Dough Baking Oven #3	6.5	None
	Natural Gas Fired Straight Dough Baking Oven #4	6.5	None
	Natural Gas Fired Straight Dough Baking Oven #5	6.5	None
	Natural Gas Fired Straight Dough Baking Oven #6	6.5	None
	Natural Gas Fired Straight Dough Baking Oven #9	6.5	None
	Natural Gas Fired Straight Dough Baking Oven #10	6.5	None
	Natural Gas Fired Straight/Medium Sponge Dough Baking Oven #11	6.5	None
	Natural Gas Fired Straight Dough Baking Oven #12	6.5	None

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
	Natural Gas Fired Straight Dough Baking Oven #13B	9.5	None
	Natural Gas Fired Straight Dough Baking Oven #14	9.5	None
	Natural Gas Fired Straight Dough Baking Oven #15	9.5	None
	Natural Gas Fired Straight/Medium Sponge Dough Baking Oven #16	9.5	None
	Natural Gas Fired Straight Dough Baking Oven #17	9.5	None
	Natural Gas Fired Straight Dough Baking Oven #18	9.5	None
	Natural Gas Fired Straight Dough Baking Oven #22	4.0	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected ovens" for the purpose of these unit-specific conditions, are Existing Natural Gas Fired Baking Ovens, for which construction or modification commenced prior to April 14, 1972, and burn natural gas exclusively.
- b. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates determined by using the equation [35 IAC 212.322]:

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

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 27.2 Mg/hr (30 ton/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	ton/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67

- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].
- d. Each affected oven is subject to the emission limits identified in Condition 5.2.2(c).

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

- a. This permit is issued based on the affected ovens not being subject to 35 IAC 218.301, Use of Organic Material, because ethanol does not create any odor nuisance and ethanol is not considered as a photochemically reactive material.
- b. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart TT, Other Emission Units, because bakeries are exempted from the control requirements in Subpart TT, pursuant to 35 IAC 218.980(f).
- c. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart FF, Bakery Ovens, because the regulation has been repealed by operation of law and is rendered null and void and of no force and effect.

#### 7.2.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected ovens.

#### 7.2.6 Emission Limitations

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

N/A

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

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

- a. Straight dough throughput (ton/month and ton/year);
- b. Medium sponge dough throughput (ton/month and ton/year);
- c. Monthly and annual aggregate VOM emissions, based on straight dough throughput, medium sponge dough throughput, and the applicable emission factors from Condition 7.2.12(b), with supporting calculations (ton/month and ton/year);
- d. Natural gas consumption (mmft<sup>3</sup>/month and mmft<sup>3</sup>/year); and
- e. Monthly and annual aggregate NO<sub>x</sub>, CO, and PM emissions from the combustion of natural gas in the affected ovens, based on natural gas consumption and the applicable emission factors from Condition 7.2.12(c), with supporting calculations (ton/month and ton/year).

7.2.10 Reporting Requirements

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

The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected ovens.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. Compliance with the emission limits in Conditions 7.2.3(b), (c), and (d) is assumed to be achieved under inherent operating conditions of an affected oven, so that no compliance procedures are set in this permit addressing these requirements.
- b. Compliance with the VOM emission limits in Condition 5.5.1 from the affected ovens shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

<u>Dough Type</u>	<u>Emission Factor (lb VOM/ton wet dough)</u>
Straight Dough	0.07
Medium Sponge Dough	6.74

These are the emission factors for baking that were determined from stack tests, and include VOM emissions from both the combustion of natural gas and the baking process.

Oven Emissions (ton) = (Straight dough and medium sponge dough throughput, ton) x (the applicable emission factor, lb/ton) x (ton/2000 lb)

- c. Compliance with the NO<sub>x</sub> and PM emission limits in Condition 5.5.1 from the combustion of natural gas in the affected ovens shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factor (lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	94
CO	40
PM	11.17

These are the emission factors for uncontrolled natural gas combustion in residential furnaces, Tables

1.4-1 and 1.4-2, AP-42, Volume I, Supplement B, October, 1996, and were representative of stack tests completed by the source.

Combustion Emissions (ton) = (Natural gas consumption, mmft<sup>3</sup>) x (the applicable emission factor, lb/mmft<sup>3</sup>) x (ton/2000 lb)

7.3 Unit 03 Natural Gas Fired Baking Ovens  
Control Natural Gas Fired Catalytic Oxidizer

7.3.1 Description

These baking ovens are used to produce cookies and crackers. Bakery products that contain yeast as an ingredient generate ethanol, a VOM, which is released during the baking process. The VOM emissions from the baking ovens are controlled by a catalytic oxidizer during the ERMS seasonal allotment period, as needed to meet the ATU allotment. Each baking oven and the catalytic oxidizer burn natural gas as the fuel.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
03	Natural Gas Fired Sponge Dough Baking Oven #7	6.5 (Oven)	Natural Gas Fired Catalytic Oxidizer
	Natural Gas Fired Sponge Dough Baking Oven #8	1.75 (Oxidizer)	

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected ovens" for the purpose of these unit-specific conditions, are Natural Gas Fired Baking Ovens controlled by a Natural Gas Fired Catalytic Oxidizer, for which construction or modification commenced prior to April 14, 1972, with a design capacity firing rate greater than 0.3 mmBtu/hr and less than 10 mmBtu/hr, and burn natural gas exclusively.
- b. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates determined by using the equation [35 IAC 212.322]:

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

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 27.2 Mg/hr (30 ton/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	ton/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67

- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].
- d. Each affected oven is subject to the emission limits identified in Condition 5.2.2(c).

#### 7.3.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected ovens not being subject to 35 IAC 218.301, Use of Organic Material, because ethanol does not create any odor nuisance and ethanol is not considered as a photochemically reactive material.
- b. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart TT, Other Emission Units, because bakeries are exempted from the control requirements in Subpart TT, pursuant to 35 IAC 218.980(f).
- c. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart FF, Bakery Ovens, because the regulation has been repealed by operation of law and is rendered null and void and of no force and effect.

#### 7.3.5 Control Requirements

The catalytic oxidizer on the affected ovens shall be operated so as to reduce uncontrolled VOM emissions by 90% overall as provided by the combination of the capture system (100%) and the destruction across the catalytic oxidizer (90%), except as provided in Condition 7.3.7(a).

7.3.6 Emission Limitations

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

N/A

7.3.7 Operating Requirements

- a. The Permittee is not required to operate the catalytic oxidizer at any time when the associated ovens are in operation.
- b. Natural gas shall be the only fuel fired in the affected ovens and the catalytic oxidizer.
- c. The Permittee shall follow good operating practices for the catalytic oxidizer, including periodic inspection, routine maintenance, and prompt repair of defects, so as to address compliance with the control requirements in Condition 7.3.5.
- d. The affected ovens shall be equipped and operated under negative pressure so that all VOM emissions are captured and discharged through the oven stacks to the catalytic oxidizer, except as provided in Condition 7.3.7(a), so as to address compliance with the control requirements in Condition 7.3.5.

7.3.8 Monitoring Requirements

The catalytic oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the catalytic oxidizer is in use, except as provided in Condition 7.3.7(a). This device shall monitor the catalytic oxidizer temperature rise across the catalyst bed, so as to address compliance with the control requirements in Condition 7.3.5.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected oven to demonstrate compliance with Conditions 5.5.1, 7.3.7, and 7.3.8, pursuant to Section 39.5(7)(b) of the Act:

- a. Sponge dough throughput (ton/month and ton/year);

- b. Monthly and annual aggregate VOM emissions, based on sponge dough throughput, the applicable emission factors from Condition 7.3.12(c), and the overall VOM control efficiency, as applicable, with supporting calculations (ton/month and ton/year);
- c. Monthly and annual aggregate VOM emissions, based on sponge dough throughput and the applicable emission factors from Condition 7.3.12(c), during operation of the affected ovens without the use of the catalytic oxidizer, as applicable, with supporting calculations (ton/month and ton/year);
- d. Natural gas consumption (mmft<sup>3</sup>/month and mmft<sup>3</sup>/year);
- e. Monthly and annual aggregate NO<sub>x</sub>, CO, and PM emissions from the combustion of natural gas in the affected ovens and the catalytic oxidizer, based on natural gas consumption and the applicable emission factors from Condition 7.3.12(d), with supporting calculations (ton/month and ton/year);
- f. The Permittee shall collect and record the following information each day for each affected oven:
  - i. Catalytic oxidizer pre and post catalyst bed temperature monitoring data (°F);
  - ii. A log of operating time for the capture system, catalytic oxidizer, monitoring device, and the associated ovens; and
  - iii. A maintenance log for the capture system, catalytic oxidizer, and monitoring device detailing all routine and non-routine maintenance performed, including dates and duration of any outages.
- g. Records addressing use of good operating practices for the catalytic oxidizer:
  - i. Records for periodic inspection of the catalytic oxidizer with date, individual performing the inspection, nature of inspection, and results of emission testing; and
  - ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

#### 7.3.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected ovens and the catalytic oxidizer; and
- b. Each period when the condition of the catalytic oxidizer that may have resulted in emissions of VOM from an affected oven in excess of the control requirements specified in Condition 7.3.5, within 30 days of such an occurrence.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

- a. Compliance with the emission limits in Conditions 7.3.3(b), (c), and (d) is assumed to be achieved under inherent operating conditions of an affected oven, so that no compliance procedures are set in this permit addressing these requirements.
- b. Compliance with the control requirements in Condition 7.3.5 is addressed by proper operation of a catalytic oxidizer, the operating requirements in Conditions 7.3.7(c) and 7.3.7(d), the monitoring requirements in Condition 7.3.8, the recordkeeping requirements in Conditions 7.3.9(f) and 7.3.9(g), and the reporting requirements in Condition 7.3.10(b).
- c. Compliance with the VOM emission limits in Condition 5.5.1 from the affected ovens shall be based on the control requirements in Condition 7.3.5, the recordkeeping requirements in Conditions 7.3.9(a), 7.3.9(b), and 7.3.9(c), and the emission factors and formulas listed below:

<u>Dough Type</u>	<u>Emission Factor</u> <u>(lb VOM/ton wet dough)</u>
Sponge Dough	11.83

This is the emission factor for baking that was determined from stack tests, and includes VOM emissions from both the combustion of natural gas and the baking process.

Oven Emissions (ton) = (Sponge dough throughput, ton) x (the applicable emission factor, lb/ton) x [1 - (the overall VOM control efficiency\*, % / 100)] x (ton/2000 lb)

\* As determined by the most recent stack test

- d. Compliance with the operating requirements in Condition 7.3.7(b) and the NO<sub>x</sub> and PM emission limits in Condition 5.5.1 from the combustion of natural gas in the affected ovens and the catalytic oxidizer shall be based on the recordkeeping requirements in Conditions 7.3.9(d) and 7.3.9(e), the reporting requirements in Condition 7.3.10(a), and the emission factors and formulas listed below:

- i. Emissions from the affected ovens shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	94
CO	40
PM	11.17

These are the emission factors for uncontrolled natural gas combustion in residential furnaces, Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement B, October, 1996, and were representative of stack tests completed by the source.

Oven Combustion Emissions (ton) = (Natural gas consumption, mmft<sup>3</sup>) x (the applicable emission factor, lb/mmft<sup>3</sup>) x (ton/2000 lb)

- ii. Emissions from the catalytic oxidizer shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u> <u>(lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	100
CO	21
PM	11.9

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 - <10 mmBtu/hr of heat input), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement B, October, 1996.

Catalytic Oxidizer Combustion Emissions (ton)  
= (Natural gas consumption, mmft<sup>3</sup>) x (the applicable emission factor, lb/mmft<sup>3</sup>) x (ton/2000 lb)

7.4 Unit 04 Existing Natural Gas/Distillate Fuel Oil Fired Boiler

7.4.1 Description

This boiler is used for the production of steam for space heating. The boiler does not utilize any emission control equipment. The boiler burns natural gas as the primary fuel or distillate fuel oil as the backup fuel.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
04	Natural Gas/Distillate Fuel Oil Fired Boiler #4	38	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected boiler" for the purpose of these unit-specific conditions, is an Existing Natural Gas/Distillate Fuel Oil Fired Boiler, for which construction, modification, or reconstruction commenced prior to April 14, 1972, with actual heat input greater than 2.9 MW (10 mmBtu/hr) and less than 29 MW (100 mmBtu/hr), and burns natural gas or distillate fuel oil exclusively.
- b. No person shall cause or allow the emission of particulate matter (PM) into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu) [35 IAC 212.206].
- c. No person shall cause or allow the emission of sulfur dioxide (SO<sub>2</sub>) into the atmosphere in any one hour period from any existing fuel combustion emission unit, burning liquid fuel exclusively, to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu) [35 IAC 214.161(b)].
- d. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

- e. The affected boiler is subject to the emission limits identified in Condition 5.2.2(c).

#### 7.4.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected boiler not being subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units for which construction, modification, or reconstruction was commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 MW (100 mmBtu/hr) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr), 40 CFR Part 60, Subpart Dc, because the affected boiler was constructed prior to June 9, 1989.
- b. This permit is issued based on the affected boiler not being subject to 35 IAC 217.141, Existing Fuel Combustion Emission Units in Chicago Major Metropolitan Areas, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).
- c. This permit is issued based on the affected boiler not being subject to 35 IAC 218.301 and 218.302, Use of Organic Material, because the provisions of 35 IAC 218.301 and 218.302 shall not apply to fuel combustion emission units, pursuant to 35 IAC 218.303.

#### 7.4.5 Operational and Production Limits and Work Practices

- a. Natural gas or distillate fuel oil shall be the only fuel(s) fired in the affected boiler.
- b. The Permittee shall not use a distillate fuel oil (Grades No. 1 and 2) in the affected boiler with a sulfur content greater than the larger of the following two values, so as to address compliance with the SO<sub>2</sub> emission limits in Condition 7.4.3(c):
  - i. 0.28 weight percent, or
  - ii. The weight percent given by the formula:  
Maximum weight percent sulfur = (0.000015) x  
(Gross heating value of the distillate fuel oil, Btu/lb).

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boiler is subject to the following:

N/A

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boiler to demonstrate compliance with Conditions 5.5.1 and 7.4.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas consumption (mmft<sup>3</sup>/month and mmft<sup>3</sup>/year);
- b. Monthly and annual aggregate NO<sub>x</sub>, CO, PM, VOM, and SO<sub>2</sub> emissions, based on natural gas consumption and the applicable emission factors from Condition 7.4.12(c)(i), with supporting calculations (ton/month and ton/year);
- c. Distillate fuel oil consumption (gallon/month and gallon/year);
- d. The maximum sulfur content for each shipment of distillate fuel oil used in the affected boiler (weight percent); and
- e. Monthly and annual aggregate SO<sub>2</sub>, NO<sub>x</sub>, CO, PM, and VOM emissions, based on distillate fuel oil consumption, distillate fuel oil sulfur content, and the applicable emission factors from Condition 7.4.12(c)(ii), with supporting calculations (ton/month and ton/year).

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of the affected boiler with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall

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

- a. Each incident when the operation of the affected boiler that may have resulted in an opacity from the affected boiler in excess of the emission limits specified in Condition 7.4.3(e), within 60 days of such an occurrence, with a copy of such record for each incident;
- b. The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected boiler; and
- c. Distillate fuel oil sulfur content combusted in the affected boiler in excess of the operational limits specified in Condition 7.4.5(b), within 30 days of such an occurrence.

#### 7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.4.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

- a. Compliance with the PM, CO, and opacity emission limits in Conditions 7.4.3(b), (d), and (e) is assumed to be achieved under inherent operating conditions of an affected boiler, so that no compliance procedures are set in this permit addressing these requirements.
- b. Compliance with the SO<sub>2</sub> emission limits in Condition 7.4.3(c) is addressed by the operational limits in Condition 7.4.5(b), the recordkeeping requirements in Condition 7.4.9(d), and the reporting requirements in Condition 7.4.10(c).
- c. Compliance with the SO<sub>2</sub>, NO<sub>x</sub>, PM, and VOM emission limits in Condition 5.5.1 from the affected boiler shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:
  - i. Emissions from the affected boiler while burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	140
CO	35
PM	14
VOM	5.8
SO <sub>2</sub>	0.6

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers with heat input greater than 10 mmBtu/hr and less than 100 mmBtu/hr, Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement B, October, 1996.

Natural Gas Emissions (ton) = (Natural gas consumption, mmft<sup>3</sup>) x (the applicable emission factor, lb/mmft<sup>3</sup>) x (ton/2000 lb)

- ii. Emissions from the affected boiler while burning distillate fuel oil shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/10<sup>3</sup> gallon)</u>
SO <sub>2</sub>	142S
NO <sub>x</sub>	20
CO	5
PM	2
VOM	0.252

These are the emission factors for uncontrolled distillate fuel oil combustion in industrial boilers with heat input greater than 10 mmBtu/hr and less than 100 mmBtu/hr, Tables 1.3-1, 1.3-3, and 1.3-6, AP-42, Volume I, Supplement E, September, 1998.

S is the weight percent sulfur content of distillate fuel oil as fired. SO<sub>2</sub> emission factor is calculated by multiplying the weight percent sulfur in the distillate fuel oil by the numerical value preceding S (e.g., if the fuel is 0.27 percent sulfur, then S = 0.27).

Distillate Fuel Oil Emissions (ton) =  
(Distillate fuel oil consumption, gallon) x

(the applicable emission factor, lb/10<sup>3</sup>  
gallon) x (ton/2000 lb)

- iii. Total emissions for each pollutant from the affected boiler shall be calculated by summing the results of Conditions 7.4.12(c)(i) and 7.4.12(c)(ii):

Boiler Emissions (ton) = (Natural Gas  
Emissions, ton) + (Distillate Fuel Oil  
Emissions, ton)

7.5 Unit 05 New Natural Gas/Distillate Fuel Oil Fired Boilers

7.5.1 Description

These boilers are used for the production of steam for space heating. The boilers do not utilize any emission control equipment. Each boiler burns natural gas as the primary fuel or distillate fuel oil as the backup fuel.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
05	Natural Gas/Distillate Fuel Oil Fired Boiler #5	63.31	None
	Natural Gas/Distillate Fuel Oil Fired Boiler #1	59.25	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. The "affected boilers" for the purpose of these unit-specific conditions, are New Natural Gas/Distillate Fuel Oil Fired Boilers, for which construction, modification, or reconstruction commenced after April 14, 1972 and prior to June 9, 1989, with actual heat input greater than 2.9 MW (10 mmBtu/hr) and less than 29 MW (100 mmBtu/hr), and burn natural gas or distillate fuel oil exclusively.
- b. No person shall cause or allow the emission of particulate matter (PM) into the atmosphere in any one hour period to exceed 0.15 kg of particulate matter per MW-hr of actual heat input from any fuel combustion emission unit using liquid fuel exclusively (0.10 lbs/mmBtu) [35 IAC 212.206].
- c. No person shall cause or allow the emission of sulfur dioxide (SO<sub>2</sub>) into the atmosphere in any one hour period from any new fuel combustion emission unit with actual heat input smaller than, or equal to, 73.2 MW (250 mmBtu/hr), burning liquid fuel exclusively, to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lbs/mmBtu) [35 IAC 214.122(b)(2)].
- d. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel

combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

- e. Each affected boiler is subject to the emission limits identified in Condition 5.2.2(c).

#### 7.5.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected boilers not being subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units for which construction, modification, or reconstruction was commenced after June 9, 1989 and that have a maximum design heat input capacity of 29 MW (100 mmBtu/hr) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr), 40 CFR Part 60, Subpart Dc, because the affected boilers were constructed prior to June 9, 1989.
- b. This permit is issued based on the affected boilers not being subject to 35 IAC 217.121, New Fuel Combustion Emission Units, because the actual heat input of each affected boiler is less than 73.2 MW (250 mmBtu/hr).
- c. This permit is issued based on the affected boilers not being subject to 35 IAC 218.301 and 218.302, Use of Organic Material, because the provisions of 35 IAC 218.301 and 218.302 shall not apply to fuel combustion emission units, pursuant to 35 IAC 218.303.

#### 7.5.5 Operational and Production Limits and Work Practices

- a. Natural gas or distillate fuel oil shall be the only fuel(s) fired in the affected boilers.
- b. The Permittee shall not use a distillate fuel oil (Grades No. 1 and 2) in the affected boilers with a sulfur content greater than the larger of the following two values, so as to address compliance with the SO<sub>2</sub> emission limits in Condition 7.5.3(c):
  - i. 0.28 weight percent, or
  - ii. The weight percent given by the formula:  
Maximum weight percent sulfur = (0.000015) x  
(Gross heating value of the distillate fuel oil, Btu/lb).

7.5.6 Emission Limitations

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

N/A

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

None

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected boiler to demonstrate compliance with Conditions 5.5.1 and 7.5.5, pursuant to Section 39.5(7)(b) of the Act:

- a. Natural gas consumption (mmft<sup>3</sup>/month and mmft<sup>3</sup>/year);
- b. Monthly and annual aggregate NO<sub>x</sub>, CO, PM, VOM, and SO<sub>2</sub> emissions, based on natural gas consumption and the applicable emission factors from Condition 7.5.12(c)(i), with supporting calculations (ton/month and ton/year);
- c. Distillate fuel oil consumption (gallon/month and gallon/year);
- d. The maximum sulfur content for each shipment of distillate fuel oil used in the affected boilers (weight percent); and
- e. Monthly and annual aggregate SO<sub>2</sub>, NO<sub>x</sub>, CO, PM, and VOM emissions, based on distillate fuel oil consumption, distillate fuel oil sulfur content, and the applicable emission factors from Condition 7.5.12(c)(ii), with supporting calculations (ton/month and ton/year).

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of an affected boiler with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe

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

- a. Each incident when the operation of an affected boiler that may have resulted in an opacity from an affected boiler in excess of the emission limits specified in Condition 7.5.3(e), within 60 days of such an occurrence, with a copy of such record for each incident;
- b. The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected boilers; and
- c. Distillate fuel oil sulfur content combusted in an affected boiler in excess of the operational limits specified in Condition 7.5.5(b), within 30 days of such an occurrence.

#### 7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.5.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

- a. Compliance with the PM, CO, and opacity emission limits in Conditions 7.5.3(b), (d), and (e) is assumed to be achieved under inherent operating conditions of an affected boiler, so that no compliance procedures are set in this permit addressing these requirements.
- b. Compliance with the SO<sub>2</sub> emission limits in Condition 7.5.3(c) is addressed by the operational limits in Condition 7.5.5(b), the recordkeeping requirements in Condition 7.5.9(d), and the reporting requirements in Condition 7.5.10(c).
- c. Compliance with the SO<sub>2</sub>, NO<sub>x</sub>, PM, and VOM emission limits in Condition 5.5.1 from the affected boilers shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:
  - i. Emissions from the affected boilers while burning natural gas shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	140
CO	35
PM	14
VOM	5.8
SO <sub>2</sub>	0.6

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers with heat input greater than 10 mmBtu/hr and less than 100 mmBtu/hr, Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement B, October, 1996.

Natural Gas Emissions (ton) = (Natural gas consumption, mmft<sup>3</sup>) x (the applicable emission factor, lb/mmft<sup>3</sup>) x (ton/2000 lb)

- ii. Emissions from the affected boilers while burning distillate fuel oil shall be calculated based on the following emission factors:

<u>Pollutant</u>	<u>Emission Factor (lb/10<sup>3</sup> gallon)</u>
SO <sub>2</sub>	142S
NO <sub>x</sub>	20
CO	5
PM	2
VOM	0.252

These are the emission factors for uncontrolled distillate fuel oil combustion in industrial boilers with heat input greater than 10 mmBtu/hr and less than 100 mmBtu/hr, Tables 1.3-1, 1.3-3, and 1.3-6, AP-42, Volume I, Supplement E, September, 1998.

S is the weight percent sulfur content of distillate fuel oil as fired. SO<sub>2</sub> emission factor is calculated by multiplying the weight percent sulfur in the distillate fuel oil by the numerical value preceding S (e.g., if the fuel is 0.27 percent sulfur, then S = 0.27).

Distillate Fuel Oil Emissions (ton) = (Distillate fuel oil consumption, gallon) x

(the applicable emission factor, lb/10<sup>3</sup>  
gallon) x (ton/2000 lb)

- iii. Total emissions for each pollutant from the affected boilers shall be calculated by summing the results of Conditions 7.5.12(c)(i) and 7.5.12(c)(ii):

Boiler Emissions (ton) = (Natural Gas  
Emissions, ton) + (Distillate Fuel Oil  
Emissions, ton)

7.6 Unit 06 New Natural Gas Fired Baking Oven

7.6.1 Description

This baking oven is used to produce cookies and crackers. Bakery products that contain yeast as an ingredient generate ethanol, a VOM, which is released during the baking process. The baking oven does not utilize any emission control equipment. The baking oven burns natural gas as the fuel.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity (mmBtu/hr)	Emission Control Equipment
06	Natural Gas Fired Straight/Medium Sponge Dough Baking Oven #13A	6.5	None

7.6.3 Applicability Provisions and Applicable Regulations

- a. The "affected oven" for the purpose of these unit-specific conditions, is a New Natural Gas Fired Baking Oven, for which construction or modification commenced on or after April 14, 1972, and burns natural gas exclusively.
- 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 which, either alone or in combination with the emission of particulate matter from all other similar process emission units, for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates determined by using the equation [35 IAC 212.321]:

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

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 408 Mg/hr (450 ton/hr):

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

- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].
- d. The affected oven is subject to the emission limits identified in Condition 5.2.2(c).

7.6.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected oven not being subject to 35 IAC 218.301, Use of Organic Material, because ethanol does not create any odor nuisance and ethanol is not considered as a photochemically reactive material.
- b. This permit is issued based on the affected oven not being subject to 35 IAC Part 218, Subpart TT, Other Emission Units, because bakeries are exempted from the control requirements in Subpart TT, pursuant to 35 IAC 218.980(f).
- c. This permit is issued based on the affected oven not being subject to 35 IAC Part 218, Subpart FF, Bakery Ovens, because the regulation has been repealed by operation of law and is rendered null and void and of no force and effect.

7.6.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected oven.

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected oven is subject to the following:

N/A

7.6.7 Testing Requirements

None

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

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

- a. Straight dough throughput (ton/month and ton/year);
- b. Medium sponge dough throughput (ton/month and ton/year);
- c. Monthly and annual aggregate VOM emissions, based on straight dough throughput, medium sponge dough throughput, and the applicable emission factors from Condition 7.6.12(b), with supporting calculations (ton/month and ton/year);
- d. Natural gas consumption (mmft<sup>3</sup>/month and mmft<sup>3</sup>/year); and
- e. Monthly and annual aggregate NO<sub>x</sub>, CO, and PM emissions from the combustion of natural gas in the affected oven, based on natural gas consumption and the applicable emission factors from Condition 7.6.12(c), with supporting calculations (ton/month and ton/year).

7.6.10 Reporting Requirements

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

The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected oven.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

- a. Compliance with the emission limits in Conditions 7.6.3(b), (c), and (d) is assumed to be achieved under inherent operating conditions of an affected oven, so that no compliance procedures are set in this permit addressing these requirements.
- b. Compliance with the VOM emission limits in Condition 5.5.1 from the affected oven shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

<u>Dough Type</u>	<u>Emission Factor (lb VOM/ton wet dough)</u>
Straight Dough	0.07
Medium Sponge Dough	6.74

These are the emission factors for baking that were determined from stack tests, and include VOM emissions from both the combustion of natural gas and the baking process.

Oven Emissions (ton) = (Straight dough and medium sponge dough throughput, ton) x (the applicable emission factor, lb/ton) x (ton/2000 lb)

- c. Compliance with the NO<sub>x</sub> and PM emission limits in Condition 5.5.1 from the combustion of natural gas in the affected oven shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factor (lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	94
CO	40
PM	11.17

These are the emission factors for uncontrolled natural gas combustion in residential furnaces, Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement B, October, 1996, and were representative of stack tests completed by the source.

Combustion Emissions (ton) = (Natural gas consumption,  
mmft<sup>3</sup>) x (the applicable emission factor, lb/mmft<sup>3</sup>) x  
(ton/2000 lb)

7.7 Fugitive VOM Emissions: Methyl Bromide Fumigation

7.7.1 Description

Methyl bromide is used for fumigation. The fumigation does not utilize any emission control equipment.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Fugitive VOM Emissions	Methyl Bromide Fumigation	None

7.7.3 Applicability Provisions and Applicable Regulations

The "affected fumigation" for the purpose of these unit-specific conditions, is a Methyl Bromide Fumigation, which uses methyl bromide exclusively.

7.7.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected fumigation not being subject to 35 IAC 218.301, Use of Organic Material, because methyl bromide does not create any odor nuisance and methyl bromide is not considered as a photochemically reactive material.
- b. This permit is issued based on the affected fumigation not being subject to 35 IAC Part 218, Subpart TT, Other Emission Units, because bakeries are exempted from the control requirements in Subpart TT, pursuant to 35 IAC 218.980(f).

7.7.5 Operational and Production Limits and Work Practices

Methyl bromide shall be the only material used in the affected fumigation.

7.7.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected fumigation is subject to the following:

N/A

7.7.7 Testing Requirements

None

7.7.8 Monitoring Requirements

None

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fumigation to demonstrate compliance with Conditions 5.5.1 and 5.5.2, pursuant to Section 39.5(7)(b) of the Act:

- a. Methyl bromide usage (lb/month and lb/year); and
- b. Monthly and annual aggregate VOM and HAP emissions, based on methyl bromide usage, with supporting calculations (ton/month and ton/year).

7.7.10 Reporting Requirements

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

- a. The Permittee shall notify the Illinois EPA within 30 days of a change in material used in the affected fumigation; and
- b. HAP emissions from the affected fumigation in excess of the emission limits specified in Condition 5.5.2, based on the current month's records plus the preceding 11 months, within 30 days of such an occurrence.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.7.9 and the formulas listed below:

Compliance with the VOM and HAP emission limits in Conditions 5.5.1 and 5.5.2 from the affected fumigation shall be based on the operating

requirements in Condition 7.7.5, the recordkeeping requirements in Condition 7.7.9, the reporting requirements in Condition 7.7.10, and the formulas listed below:

Fumigation Emissions (ton) = (Methyl bromide usage, lb) x (ton/2000 lb)

## 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 March 24, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

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

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

### 8.3 Emissions Trading Programs

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA,

emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change, and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

- a. Describe the physical or operational change;
- b. Identify the schedule for implementing the physical or operational change;
- c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
- d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
- e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

## 8.5 Testing Procedures

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

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

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

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

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

#### 8.6.2 Test Notifications

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

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

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be

submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

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

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Eisenhower Tower  
1701 South First Avenue  
Maywood, Illinois 60153

iii. Illinois EPA - Air Permit Section

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

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

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

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

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

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

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

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner

unless an alternate schedule for compliance with the applicable requirement is established.

#### 9.2.2 Duty to Maintain Equipment

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

#### 9.2.3 Duty to Cease Operation

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

#### 9.2.4 Disposal Operations

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

#### 9.2.5 Duty to Pay Fees

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

### 9.3 Obligation to Allow Illinois EPA Surveillance

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

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

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

#### 9.4 Obligation to Comply with Other Requirements

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

#### 9.5 Liability

##### 9.5.1 Title

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

##### 9.5.2 Liability of Permittee

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

##### 9.5.3 Structural Stability

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

#### 9.5.4 Illinois EPA Liability

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

#### 9.5.5 Property Rights

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

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

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

#### 9.6.2 Records of Changes in Operation

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

#### 9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

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

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

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

#### 9.10.2 Emergency Provision

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

#### 9.11 Permanent Shutdown

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

## 9.12 Reopening and Reissuing Permit for Cause

### 9.12.1 Permit Actions

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

### 9.12.2 Reopening and Revision

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

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

### 9.12.3 Inaccurate Application

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

### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee

shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

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

#### 9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

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

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

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

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

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

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

WDM:jar