

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Conoco Inc., Wood River Products Terminal  
I.D. No.: 119050AAN  
Application No.: 95100127  
July 23, 2002

217/782-2113

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

PERMITTEE

Conoco Inc., Wood River Products Terminal  
Attn: Dennis Abington  
2150 South Delmar Avenue  
Hartford, Illinois 62048

<u>Application No.:</u> 95100127	<u>I.D. No.:</u> 119050AAN
<u>Applicant's Designation:</u>	<u>Date Received:</u> October 26, 1995
<u>Operation of:</u> Petroleum Products Terminal	
<u>Date Issued:</u> TO BE DETERMINED	<u>Expiration Date<sup>2</sup>:</u> DATE
<u>Source Location:</u> 2150 South Delmar Avenue, Hartford, Madison County	
<u>Responsible Official:</u> Dennis Abington	

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

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

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

DES:EEW:jar

cc: Illinois EPA, FOS, Region 3  
USEPA

<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.

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

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1.0 SOURCE IDENTIFICATION

1.1 Source

Conoco Inc., Wood River Products Terminal  
2150 South Delmar Avenue  
Hartford, Illinois 62048  
580/767-6967

I.D. No.: 119050AAN  
Standard Industrial Classification: 5171, Petroleum Bulk Plants &  
Terminals

1.2 Owner/Parent Company

Conoco Inc.  
1000 South Pine, 5540 CB  
Ponca City, Oklahoma 74602-1267

1.3 Operator

Conoco Inc., Wood River Products Terminal  
2150 South Delmar Avenue  
Hartford, Illinois 62048

Dennis Abington  
580/767-6967

1.4 General Source Description

The Conoco Inc., Wood River Products Terminal is located at 2150 South Delmar Avenue, Hartford, Madison County, Illinois. The source serves as a bulk petroleum terminal for receipt and distribution of various petroleum products. The terminal receives refined petroleum products and petroleum blend stocks from pipeline, stores material in bulk storage tanks, then redistributes through two modes of transportation: transport cargo tanks for surface/highway transportation via truck loading rack, and to other pipeline systems.

The Wood River Products Terminal handles the following types of petroleum products: gasoline (all grades), jet fuels (all grades), butane/isobutene, propane, natural gasoline, petroleum transmises, and oil/water mixes. All activities and processes undertaken at the site either directly, or indirectly, support the primary function of petroleum products receipt and distribution.

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2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual Cubic Feet per Minute
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
bbl	Barrels (US Petroleum)
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
ft <sup>3</sup>	Cubic Feet
GD MACT	Gasoline Distribution Maximum Achievable Control Technology
HAP	Hazardous Air Pollutant
hr	Hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
IFR	Internal Floating Roof
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kPa	Kilopascals
kW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound
m	Meter
m <sup>3</sup>	Cubic Meters
ml	Milliliters
mmBtu	Million British thermal units
mm Hg	millimeter Mercury
mo	Month
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides

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NSPS	New Source Performance Standards
OM	Organic Material
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
PSL	Permanent Submerged Loading
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
RM	Rim Mounted
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
TANKS	USEPA Emission Estimating Program for Storage Tanks
TOC	Total Organic Compound
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
TVP	True Vapor Pressure
USEPA	United States Environmental Protection Agency
VCU	Vapor Combustion Unit
VMR	Vapor Mounted Resilient
VMRW	Vapor Mounted Rubber Wiper
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
wt	Weight
yr	Year

### 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:

Wastewater Storage Tank  
3 Fixed Roof Storage Tanks for Product Additives  
Crude Oil Meter Prover Sump  
EP-3 Flare for Cavern, LPG Rack, and Miscellaneous LPG Sources

- 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:

EP-2 Flare for Isobutene Sphere  
WW-1 Sequencing Batch Reactor (Wastewater Biological)

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

Storage tanks of 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)]

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)]

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane or liquefied petroleum gas [35 IAC 201.210(a)(4)(A)]

- 3.1.4 Activities that are considered insignificant activities

pursuant to 35 IAC 201.210(b).

3.2 Addition of Insignificant Activities

- 3.2.1 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).
- 3.2.2 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.
- 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

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4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Built	Emission Control Equipment
Tank Truck Loading Rack (LR-1)	Loads Petroleum Products and Blend Stock Onto Tank Trucks	1954	Truck Loading Rack Flare (Added in 1988) (EP-1)
Group I Storage Tanks <sup>1</sup>	Internal Floating Roof (IFR) Storage Tanks	1954	Floating Roof with Primary Seal and Rim-Mounted (RM) Secondary Seal, Permanent Submerged Loading
Group II Storage Tanks <sup>1</sup>	Modified IFR Storage Tanks	1954 <sup>2</sup>	Floating Roof with Both Primary and Secondary Seals, Permanent Submerged Loading
Group III Storage Tanks <sup>1</sup>	IFR Storage Tanks	March 1979	Floating Roof with Primary Seal and RM Secondary Seal, Permanent Submerged Loading
Fugitive Emissions	Equipment Components - Processing of Material Throughout Piping System	N/A	Work Practices and Equipment Replacement

<sup>1</sup> See Attachment 1 for Storage Tank Details

<sup>2</sup> Exception - Tanks were Built 1954, Modified with New IFRs in 2000

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.2 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 emissions 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 25 miles per hour (40 kilometers per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent into the atmosphere from any emission unit, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Vapor Pressure Operating Requirements

Pursuant to 35 IAC 219.585(a), (b), and (c), during the regulatory control periods of June 1 to September 15 of each year, no person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois, gasoline that has a Reid vapor pressure in excess of the following:

- a. Gasoline Reid vapor pressure shall not exceed 7.2 psi (49.68 kPa); and
- b. Ethanol blend gasoline, having at least 9% but not more than 10% ethyl alcohol by volume of the blended mixture, shall not exceed the limitations of Condition 5.2.3(a) above by more than 1.0 psi (6.9 kPa).

Notwithstanding this limitation, blenders of ethanol

blend gasoline whose Reid vapor pressure is less than 1.0 psi above the base stock gasoline immediately after blending with ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline.

#### 5.2.4 Ozone Depleting Substances

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

- 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.

#### 5.2.5 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, as part of the annual compliance certification required by 40 CFR Part 70 or 71.

#### 5.2.6 Startup, Shutdown, and Malfunction Plan

The Permittee shall comply with the standards for operation and maintenance requirements for Gasoline Distribution Maximum Achievable Control Technology (GDMACT) sources pursuant to 40 CFR Part 63, Subpart A:

- a. Develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; a program of corrective action for malfunctioning process; and air pollution control and monitoring equipment used to comply with the relevant standard.
  - b. During periods of startup, shutdown, and malfunction, the Permittee must operate and maintain any affected source (including associated air pollution control and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions in accordance with the procedures specified in the startup, shutdown, and malfunction plan required by Condition 5.2.6(a) and as required by 40 CFR 63.6(e).
- 5.2.7
- 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.
- 5.2.8 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 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 an Episode Action 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

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

### 5.4 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:

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- 5.4.1 During the regulatory control period, June 1 through September 15 of each year, the Permittee shall state that the Reid vapor pressure of all gasoline or ethanol blends leaving the source for use in Illinois complies with the Reid vapor limitations of Condition 5.2.3. Any operation receiving this gasoline shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 219.585(b) and (c).
- 5.4.2 The Permittee shall perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. Each piece of equipment shall be inspected during the loading of a gasoline tank truck. When a leak is detected, repair or replacement of equipment shall be made in accordance with 40 CFR 63.424(c) or (d). The Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. [40 CFR 63.424]

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 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding all emission unit emissions. 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)	118.6
Sulfur Dioxide (SO <sup>2</sup> )	----
Particulate Matter (PM)	----
Nitrogen Oxides (NO <sub>x</sub> )	3.3
HAP, Not Included in VOM or Particulate Matter	----
Total	121.9

5.5.2 Emissions of Hazardous Air Pollutants

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

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, 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:

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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 General Records for Storage Tanks

- a. The Permittee shall maintain a log identifying which unit-specific condition (Condition 7.2, 7.3, or 7.4 of this permit) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.
- b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m<sup>3</sup> (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.
  - i. The date\* on which construction of the tank commenced, with a copy of supporting documentation;
  - ii. The date(s)\* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, commenced on the tank, if applicable;
  - iii. A list of the types of VOL actually stored in the tank and anticipated to be stored in the tank, with date of each change in the list; and
  - iv. The dimensions of the tank and an analysis of capacity, if the tank was constructed, modified, or reconstructed after July 23, 1984. [40 CFR 60.116b(b)]

\* If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

5.6.3 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the

storage tanks at the source to demonstrate compliance with the annual emission limits in Condition 5.5. These records shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

- a. The color of each storage tank; and
- b. The condition of each storage tank.

#### 5.6.4 Records for Operating Scenarios

If any storage tank identified in this permit as storing VOL or VPL changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F as provided for in Condition 5.8, the Permittee shall maintain a log identifying liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to VOL or VPL storage.

#### 5.6.5 Records for Equipment Leak Inspections

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

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

5.4, but was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

#### 5.6.6 Records for Gasoline Volatility

Pursuant to 35 IAC 219.585(h)(1), the Permittee shall maintain records of the following items for gasoline and ethanol blends leaving the source for use in Illinois:

- a. Reid vapor pressure of each gasoline or ethanol blend shipment;
- b. Quantity of each gasoline or ethanol blend shipment; and
- c. Date of delivery for each shipment.

#### 5.6.7 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), 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. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

### 5.7 General Reporting Requirements

#### 5.7.1 General Source-Wide Reporting Requirements

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

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

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

5.8 General Operational Flexibility/ Anticipated Operating Scenarios

- a. The Permittee is authorized to store materials with a vapor pressure less than 0.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any storage tank identified in this permit as a volatile organic liquid (VOL) or (volatile petroleum liquid (VPL) storage tank. In such instances, the unit-specific permit conditions in Section 7 of this permit applicable to such tank based on the storage of VOL or VPL shall no longer apply. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of an emission unit, as defined in 35 IAC 201.102.
- b. Upon resuming storage of VOL or VPL in such a tank, the applicable unit-specific conditions of Section 7 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VOL or VPL, the Permittee shall conduct applicable inspection of the tank for storage of VOL or VPL.

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM and HAP 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 the use of USEPA approved emissions estimating guidance.

- a. For the purpose of estimating VOM emissions from the

storage tanks, the current version of the TANKS program is acceptable.

- b. For the purpose of estimating fugitive VOM emissions from components at the facility, the emission factors found in "Marketing Terminal Emission Factors" published by USEPA on the Technology Transfer Network bulletin board in February, 1995 or the best available emission factors, including Agency agreed to factors developed by the source, are acceptable.
- c. For the purpose of estimating HAP emissions from equipment at the facility, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable. Other means of estimating HAP emissions utilizing USEPA accepted methodologies such as facility specific testing or API provided information are also acceptable.
- d. Total VOM and HAP emissions at the source shall be determined as the sum of the respective VOM and HAP emissions from the loading rack (Condition 7.1), the tanks (Conditions 7.2 through 7.4), and fugitives (Condition 7.5).

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6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Truck Loading Rack  
 Control: Vapor Combustion Unit w/Flare

7.1.1 Description

The Permittee operates a 3-bay loading rack used to redistribute various refined petroleum products and petroleum blend stocks via transport cargo tanks. The VOM emissions from the truck loading rack occur when material is loaded into delivery vehicles. A vapor combustion unit (VCU) with a flare is used to capture and control the emissions that occur as a result of displacement of vapors in the delivery vehicles. The rack cannot function unless the flare is operational.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Date of Construction	Emission Control Equipment
Tank Truck Loading Rack (LR-1)	Loads Petroleum Products and Blend Stock into Tank Trucks	1954	Loading Rack Flare (added in 1988) (EP-1)

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected loading rack," for the purpose of these unit specific conditions, is a loading rack subject to the requirements of 40 CFR 63 Subparts A and R, Gasoline Terminals (§ 63.420 thru 63.429). For purposes of 40 CFR 63 Subpart R, "cargo tanks" includes gasoline delivery tank trucks used at bulk gasoline terminals which are loading gasoline or has loaded gasoline on the immediately previous load.
- b. i. The specific emission standard for the gasoline loading is contained in 40 CFR 63.422(b), which limits emissions to 10 mg of total organic compounds per liter of gasoline loaded. The tank trucks loaded must meet vapor-tight requirements described in 40 CFR 63.425. The equipment leaks provisions (i.e.,

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for pumps and valves) is described in 40 CFR 63.424 and uses Method 21 in 40 CFR 60, Appendix A to determine leaks.

- ii. When loading gasoline the operation is subject to 35 IAC 219.582(a)(i) which limits emissions to 80 mg of VOM per liter of gasoline loaded. Compliance with Condition 7.1.3(b)(i) shall be deemed compliance with this requirement.
- c. Loading of diesel or other distillates into tank trucks are subject to 35 IAC 219.122(a) and 35 IAC 219.301.
- i. 35 IAC 219.122(a) states that no person shall cause or allow the discharge of more than 8 lb/hr of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having throughput of greater than 40,000 gal/day into any railroad tank car, tank truck, or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions. If no odor nuisance exists this limitation shall only apply to the loading of VOL with a vapor pressure of 2.5 psia or greater at 70°F. Note that filling of a pressurized tank truck is considered to be equivalent to a submerged loading pipe. The vapor pressure of diesel and distillates are below 2.5 psia.
  - ii. 35 IAC 219.301 states that emissions of VOM may not exceed 8 lb/hr but if there is no odor nuisance the limit shall only apply to photochemically reactive material. Neither diesel nor other distillates are photochemically reactive pursuant to the definition in 35 IAC 211.4690.
- d. Malfunction and Breakdown Provisions

Since the vapors from loading of diesel or kerosene are voluntarily vented to the VCU and are not required to do so by any regulation, those products may

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continue to be loaded during malfunction or breakdown of the VCU or any other time the VCU is not operational, provided the previous use of the tank truck being loaded was not hauling gasoline.

- e. There are also source wide regulation applicability limitations in Condition 5.2.2 that include this unit.
- f. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm, pursuant to 35 IAC 214.301.

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected gasoline loading operation not being subject to the New Source Performance Standards (NSPS) for Bulk Gasoline Terminals, 40 CFR Part 60, Subpart XX, Bulk Gasoline Terminals, because the affected gasoline terminal was constructed prior to the applicability date of December 17, 1980.
- b. This permit is issued based on the affected gasoline loading operation not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected gasoline loading operation is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.1.5 Control and Operational Requirements

- a. The current control device for this affected loading rack is a VCU. The affected loading rack and vapor collection and combustion systems shall be designed and operated as follows: (40 CFR 63.422)
  - i. The emissions from the gasoline cargo tank loading rack with vapor collection and combustion system shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded. (40 CFR 63.422(b))
  - ii. Flares shall be operated with a flame present at all times and shall be monitored using a thermocouple or other equivalent device to detect the presence of a flame. The truck loading rack flare must be operational before the terminal automation process authorizes trucks to be loaded. An affected loading rack must be shut down and not allow loading if the flare is not maintained during loading. (40 CFR 63.11(b))
  - iii. Failure to maintain a flame in the vapor combustion unit (VCU) of the vapor combustion system while loading gasoline product shall be considered a violation of this emission

standard. (40 CFR 63.427(b))

- b. The terminal's vapor collection and vapor combustion system shall meet the following requirements:
  - i. The vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. (40 CFR 60.502(d))
  - ii. The vapor collection and gasoline loading equipment shall be designed and operated to prevent gauge pressure in the gasoline cargo tank from exceeding 450 mm of water during product loading. (40 CFR 60.502(h))
  - iii. No pressure-vacuum vent in the vapor collection system shall begin to open at a system pressure less than 450 mm of water. (40 CFR 60.502(i))
  - iv. The Permittee shall provide a pressure tap or equivalent on the vapor collection system. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection. (35 IAC 219.581(b)(2))
- c. All loading of liquid product into gasoline cargo tanks at this bulk gasoline terminal shall be limited to vapor-tight tanks using the following procedures in accordance with 40 CFR 60.502(e): (40 CFR 63.422(c))
  - i. The owner or operator shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline cargo tank. (40 CFR 60.502(e)(1))
  - ii. The owner or operator shall require the tank identification number to be recorded as each gasoline cargo tank is loaded. (40 CFR 60.502(e)(2))

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- iii. The owner or operator shall cross-check each tank identification number obtained above with the file of tank vapor tightness documentation within two weeks after the tank is loaded. (40 CFR 60.502(e)(3))
- iv. The owner or operator shall notify the owner or operator of each no vapor-tight gasoline cargo tank loaded at the terminal within three weeks after the loading has occurred. (40 CFR 60.502(e)(4))
- v. The terminal owner or operator shall take steps assuring that a no vapor-tight gasoline cargo tank will not be reloaded at the terminal until vapor tightness documentation for that gasoline cargo tank is obtained which documents that: (40 CFR 63.422(c)(2))
  - A. The gasoline cargo tank meets the applicable test requirements in 40 CFR 63.425(e), i.e., Annual Certification Test;
  - B. For each gasoline cargo tank failing the test in 40 CFR 63.425(f) or (g), i.e., Leak Detection Test or Nitrogen Pressure Decay Field Test, at the terminal, the cargo tank either:
    - 1. Before repair work is performed on the cargo tank, meets the Nitrogen Pressure Decay Field Test or Continuous Performance Pressure Decay Test of 40 CFR 63.425(h), or
    - 2. After repair work is performed on the cargo tank before or during Nitrogen Pressure Decay Field Test or Continuous Performance Pressure Decay Test, subsequently passes the Annual Certification Test.
- d. The Permittee shall take the following measures, along with other reasonable measures, as to not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended

periods of time. (40 CFR 63.424(g))

- i. Minimize gasoline spills;
- ii. Clean up spills as expeditiously as practicable;
- iii. Cover all open gasoline containers with a gasketed seal when not in use; and
- iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

#### 7.1.6 Emission Limitations

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

N/A

#### 7.1.7 Testing Requirements

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

#### 7.1.8 Inspection and Monitoring Requirements

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- a. The terminal's VCU shall be continuously monitored in the following manner:
  - i. A continuous monitoring system (CMS) for the vapor combustion unit shall be installed, calibrated, certified, operated and maintained. (40 CFR 63.427(a))
  - ii. The VCU shall have a heat-sensing device, such as an ultra-violet beam sensor or a thermocouple, installed in proximity to the pilot light to indicate the presence of a flame. (40 CFR 63.427(a)(4))
  - iii. The VCU and its monitor shall be maintained and operated as per the manufacturer's and/or vendor's recommendations.
- b.
  - i. The Permittee shall perform a monthly visual (sight, sound, and smell) inspection for leaks of all equipment in gasoline liquid or vapor service during the loading of a gasoline cargo tank. (40 CFR 63.424(a))
  - ii. When a leak is detected, repair shall be made as soon as possible.
    - A. An initial attempt at repair shall be made no later than 5 calendar days after the leak is detected.
    - B. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of leak, except as provided below.
    - C. If repair within 15 days is demonstrated on an individual leak basis to not be feasible, the owner or operator may delay repair by providing reasons why a delay is needed and the date by which repair is expected to be completed in a written report to the Agency.

7.1.9 Recordkeeping Requirements

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

- a. Throughput of gasoline, diesel, kerosene and other distillates [barrels or gallons/mo for gasoline, diesel and distillates; lb or gallons/mo for propane];
- b. Vapor pressure of the gasoline loaded (psia);
- c. An up-to-date, readily accessible record of the continuous monitoring data required by 40 CFR 63.427(a) [Condition 7.1.8(a)]. [40 CFR 63.428(c)(1)]
  - i. This record shall indicate the time intervals during which loading of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loading. The date and time of day shall also be indicated at reasonable intervals on this record. This may not be exception, i.e., that no gasoline was loaded when there was no flame.
- d. Records of the test results for each gasoline cargo tank loading at the terminal as follows:
  - i. Records of annual certification testing performed under 40 CFR 63.425(e)(1) and (2). [40 CFR 63.428(b)(1)]

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

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- iii. Records for each leak that is detected,  
including the following:
  - A. The equipment type and identification  
number;

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- B. The nature of the leak, i.e., vapor or liquid, and the method of detection, i.e., sight, sound, or smell;
  - C. The date the leak was detected and the date of each attempt to repair the leak;
  - D. Repair methods applied in each attempt to repair the leak;
  - E. "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak;
  - F. The expected date of successful repair of the leak if the leak is not repaired within 15 days; and
  - G. The date of successful repair of the leak.
- f. VOM and HAP emissions (ton/mo and ton/yr).
- g. NO<sub>x</sub> emissions from flare to verify compliance with Condition 5.5.1 (ton/mo and ton/yr).

7.1.10 Reporting Requirements

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

- a. The Permittee shall report pursuant to 40 CFR 63.10(e)(3) each exceedance or failure to maintain, as appropriate, the monitored operating parameter. [40 CFR 63.428(h)(1)]
  - i. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred.
  - ii. A description and timing of the steps taken to repair or perform maintenance on the vapor

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collection and combustion system or the  
compliance monitoring system of Condition  
7.1.8(a).

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

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- d. The above reports may be submitted with the monitoring reports required by Condition 8.6.1.
- e. The Permittee shall report within 30 days any loading of gasoline into cargo tank trucks when the VCU was not operating.
- f. The Permittee shall report emissions in excess of the limits for VOM or NO<sub>x</sub> in Condition 5.5.1 within 30 days of a record showing such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Diesel oil and other distillates may be loaded even if the VCU is not operating since the vapors from those materials are not required to be vented to the VCU by any regulation.
- b. In response to failure or planned maintenance of the existing VCU, The Permittee may use a portable VCU for periods of up to 15 days to allow for the continued loading of gasoline, provided that the portable VCU has been guaranteed by the supplier to be equivalent in its destruction efficiency for VOM and have a monitoring system for determining the presence of a flame during gasoline loading. All requirements in Condition 7.1 will apply to the replacement portable VCU. Extensions beyond 15 days may be granted upon request from and approval by the Illinois EPA.

7.1.12 Compliance Procedures

- a. Compliance with the emission limits in Condition 5.5.1 and 7.1.3 shall be based on the monitoring required by Condition 7.1.8, the recordkeeping required by Condition 7.1.9 and the reporting required by Condition 7.1.10.
- b. VOM emissions from gasoline loading shall be based on 10 mg/l times throughput in liters.
- c. For liquid products other than gasoline the formula in AP-42, Section 5.2.2, (January, 1995), or other USEPA methodology shall be used.

7.2 Unit: Group I Storage Tanks - Internal Floating Roof Petroleum Liquid Storage Tanks

7.2.1 Description

The Permittee operates internal floating roof (IFR) storage tanks built in 1954 that store various gasoline and petroleum products. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Emission Units and Pollution Control Equipment<sup>1</sup>

Storage Tank	Description	Emission Control Equipment
TK 401	Internal Floating Roof (IFR) Tank	Floating Roof, Vapor Mounted Resilient (VMR) Primary Seal, Rim-Mounted (RM) Secondary Seal, and a Permanent Submerged Loading (PSL) Pipe
TK 404	IFR Tank	Floating Roof, VMR Primary Seal, RM Secondary Seal, and a PSL Pipe
TK 406	IFR Tank	Floating Roof, VMR Primary Seal, Vapor Mounted Rubber Wiper (VMRW) Secondary Seal, and a PSL Pipe
TK 410	IFR Tank	Floating Roof, VMR Primary Seal, RM Secondary Seal, and a PSL Pipe
TK 411	IFR Tank	Floating Roof, VMR Primary Seal, RM Secondary Seal, and a PSL Pipe
TK 421	IFR Tank	Floating Roof, VMR Primary Seal, VMRW Secondary Seal, and PSL Pipe

<sup>1</sup> See Table 1-1 for more details.

7.2.3 Applicability Provisions

An "affected tank" for the purpose of these unit-specific conditions, is a storage tank subject to 35 IAC 219, Subpart B and to the control requirements of 40 CFR 63, Subpart R. Each storage tank has a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, stores volatile petroleum liquid (VPL), is equipped with an internal floating roof, a permanent submerged loading pipe, a vapor mounted resilient primary seal and a secondary seal, and is subject to the requirements of 35 IAC 219.121(b)(1), 219.122(b), and 40 CFR 63 Subpart R.

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As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.2.2. The status of all significant emission storage tanks at this source is summarized in Attachment 1 (Table 1-1).

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected tanks are not subject to requirements of 35 IAC 219.120, 219.127, 219.128, and 219.129, because the affected tanks are used solely for the storage of petroleum liquids [35 IAC 219.119(e)].
- b. The affected tanks are not subject to requirements of 35 IAC 219.124 and 40 CFR 63.423(b), because the affected tanks do not have external floating roofs.
- c. This permit is issued based on the affected tanks not being subject to the New Source Performance Standards (NSPS) for petroleum liquids, 40 CFR Part 60, Subpart K, Ka, or Kb, because the affected tanks were constructed prior to June 11, 1973 and have not been modified since that date.
- d. This permit is issued based on the affected tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks use a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.2.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. Floating roof which rests on the surface of the VPL that is equipped with a closure seal or seals [35 IAC 219.121(b)(1) and 40 CFR 63.423(a)];
- b. Permanent submerged loading pipe [35 IAC 219.122(b)].

7.2.6 Emission Limitations

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

N/A

7.2.7 Operating Requirements

- a. Each affected tank shall be operated so that the

floating roof including the seal closure devices meet each of the following requirements:

- i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 219.123(b)(2)];
- ii. All openings of the internal floating roof deck, except stub drains, shall be equipped with covers, lids, or seals such that: [35 IAC 219.123(b)(3)]
  - A. The cover, lid, or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank;
  - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and
  - C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting;
- b. VPL stored in the affected tank shall have a vapor pressure greater than 10.34 kPa (1.5 psia) but less than 86.19 kPa (12.5 psia) at 294.3°K (70°F) [35 IAC 219.121(b)(1)];
- c. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 219.121 (b)(1)].

#### 7.2.8 Inspection Requirements

Pursuant to 40 CFR 63.425(d), the Permittee shall perform the following inspections on each affected tank as described in 40 CFR 60.113b(a):

- a. The Permittee shall perform one of the two following ongoing inspections:

- i. Visually inspect the IFR, the primary seal and the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months. If the IFR is not resting on the surface of the VOL inside the storage vessel, or there is liquid built up on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Illinois EPA in the inspection report required in Condition 7.2.10. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take to minimize emissions and that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible; or
  - ii. Visually inspect the IFR, the primary seal, and the secondary seal at least once every 5 years during a time the storage vessel is emptied and degassed. If the IFR has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL.
- b. Notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Condition 7.2.8(a)(ii) to afford the Agency the opportunity to have an observer present. If the inspection is not planned and the Permittee could not have known about the inspection 30 days in advance, the Permittee shall notify the Illinois EPA at least 7 days prior to the refilling of the storage vessel.

Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned.

7.2.9 Recordkeeping Requirements

- a. The Permittee shall maintain records of the results of any inspection required by Condition 7.2.8(a) for each affected tank, pursuant to 35 IAC 219.123(b)(6), including:
  - i. Identification of the affected tank and type of inspection;
  - ii. When the inspection was performed;
  - iii. Who performed the inspection;
  - iv. The method of inspection;

- v. The observed condition of each feature of the floating roof (seals, roof deck and fittings) with raw data recorded during the inspection; and
- vi. Summary of compliance, including recommended corrective actions if appropriate.

Records of all inspections shall be kept for 5 years from the date of entry for each record.

- b. In addition to the information in Condition 7.2.9(a) above, the Permittee shall maintain records of the following for each affected tank whenever a Cover and Seal Inspection (Condition 7.2.8(b)) is accomplished [35 IAC 219.123(b)(6)]:

Records sufficient to identify when an affected tank is emptied for any reason other than the transfer of liquid during normal operation or when repairs are made as a result of semi-annual inspections or incident of roof damage or defect.

- c. In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tanks to demonstrate compliance with Conditions 5.5.1, 7.2.7 and 7.2.8, pursuant to Section 39.5(7)(b) of the Act:

VOM and HAP emissions (ton/mo and ton/yr).

#### 7.2.10 Reporting Requirements

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

- a. Notify the Illinois EPA within 5 days of becoming aware of storage of VPL in an affected tank not in compliance with the control requirements due to absence of one of the features required by Condition 7.2.5 (e.g., "no permanent submerged loading pipe,") status. This notification shall include a description of the event, the cause for the deviation, actions

taken to correct the deviation, and the steps to be taken to avoid future deviation.

- b. Notify the Illinois EPA within 30 days of becoming aware of any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.2.5) due to damage, deterioration, or other condition of the tank. This notification shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps to be taken to avoid future deviation.

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Changes in the material stored in a tank. The Permittee is authorized to store materials with a vapor pressure less than 1.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any affected tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.2 of this permit applicable to such tank based on the storage of VPL shall no longer apply. [35 IAC 219.121]
- b. If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure of less than 1.5 psia at 70°F, the Permittee shall maintain a record identifying the specific tank, the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.
- c. Upon resuming storage of VPL in the affected tank, the applicable unit specific conditions of Section 7.2 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of

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VPL, the Permittee shall conduct an appropriate inspection of the tank for storage of VPL. [35 IAC 219.123(b)(5)]

#### 7.2.12 Compliance Procedures

Emissions from the affected storage tanks shall be determined through the use of the most current version of the TANKS program.

7.3 Unit: Group II Storage Tanks - New Internal Floating Roof  
 Petroleum Liquid Storage Tanks

7.3.1 Description

The Permittee operates petroleum liquid storage tanks built in 1954 and modified in March 2000, for the purpose of storing gasoline and other petroleum products, with new internal floating roofs (IFR) and mechanical shoe primary seals. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.3.2 List of Emission Units and Pollution Control Equipment<sup>1</sup>

Storage Tank	Description	Emission Control Equipment
TK-402	IFR Tank	Floating Roof, Mechanical Shoe Primary Seal, RM Secondary Seal, and a PSL Pipe
TK-412	IFR Tank	Floating Roof, Mechanical Shoe Primary Seal, RM Secondary Seal, and a PSL Pipe

<sup>1</sup> See Table 1-1 for more details.

7.3.3 Applicability Provisions

The "affected tanks" for the purpose of these unit-specific conditions, are new internal floating roof storage tanks, used for the storage of volatile organic liquids (VOL), for which construction, reconstruction, or modification commenced prior to June 11, 1973, with a storage capacity greater than 151.42 cubic meters (40,000 gallons), that are subject to the NESHAP requirements of 40 CFR 63, Subparts A and R, and that rely on an internal floating roof for compliance. The status of all affected storage tanks at this source is summarized in Attachment 1.

7.3.4 Non-Applicable Regulations

- a. The affected tanks are not subject to the requirements of 35 IAC 219.120, 219.127, 219.128, and 219.129, because the affected tanks are used solely for the storage of petroleum liquids, pursuant to 35 IAC 218.119(e).

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- b. This permit is issued based on the affected tanks not being subject to 35 IAC 219.124 and 40 CFR 63.423(b), because the affected tanks are not equipped with external floating roofs.

- c. This permit is issued based on the affected tanks not being subject to the New Source Performance Standards (NSPS) for petroleum liquids, 40 CFR Part 60, Subpart K, Ka, or Kb, because the affected tanks were constructed prior to June 11, 1973 and have not been significantly modified since that date.
- d. This permit is issued based on the affected tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks use a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

#### 7.3.5 Control Requirements

Each affected tank shall comply with 40 CFR 63.423(a) by having the following features:

- a. A fixed roof in combination with an internal floating roof (IFR) equipped with one of the following closure devices between the wall of the storage vessel and the edge of the IFR: [40 CFR 60.112b(a)(1)]
  - i. A foam or liquid-filled seal;
  - ii. Two seals mounted one above the other so that each forms a continuous closure; or
  - iii. A mechanical shoe seal;
- b. Each opening in a noncontact IFR except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface as described in 40 CFR 60.112b(a)(1)(iii).
- c. A permanent submerged loading pipe [35 IAC 219.122(b)].

#### 7.3.6 Emission Limitations

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

N/A

7.3.7 Operating Requirements

- a. The Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time; [40 CFR 63.424(g)]
- b. The IFR shall be floating on the liquid surface (but not necessarily in contact with it) at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and accomplished as rapidly as possible; [40 CFR 63.423(a) as described in 40 CFR 60.112b(a)(1)(i)]
- c. VOL stored in the affected tanks shall have a maximum true vapor pressure (TVP) equal to or greater than 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.1 psia) at 294.3°K (70°F). [40 CFR 63.423(a) as described in 40 CFR 60.112b(a)]

7.3.8 Inspection Requirements

Pursuant to 40 CFR 63.425(d), the Permittee shall perform the following inspections on each affected tank as described in 40 CFR 60.113b(a):

- a. The Permittee shall perform one of the two following ongoing inspections:
  - i. Visually inspect the IFR, the primary seal and the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months. If the IFR is not resting on the surface of the VOL inside the storage vessel, or there is liquid built up on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may

be requested from the Illinois EPA in the inspection report required in Condition 7.3.10. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take to minimize emissions and that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible; or

- ii. Visually inspect the IFR, the primary seal, and the secondary seal at least once every 5 years during a time the storage vessel is emptied and degassed. If the IFR has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL.
- b. Notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Condition 7.3.8(a)(ii) to afford the Agency the opportunity to have an observer present. If the inspection is not planned and the Permittee could not have known about the inspection 30 days in advance, the Permittee shall notify the Illinois EPA at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned.

#### 7.3.9 Recordkeeping Requirements

Pursuant to 40 CFR 63.428(d), the Permittee shall keep records for each affected storage tank as described by 40 CFR 60.115b(a):

- a. Keep a record of each inspection performed as required by Condition 7.3.8. Each record shall identify the affected tank on which the inspection was performed, the date the vessel was inspected, and the observed

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condition of each component of the control equipment (seals, internal floating roof, and fittings).

- b. Records of all inspections shall be kept for 5 years from the date of entry for each record.
- c. Records that are sufficient to identify whenever the tank is empty for any reason and the length of time it is out of service, or whenever repairs are made as a result of any inspection or incidence of roof damage or defect.
- d. In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tanks to demonstrate compliance with Conditions 5.5.1 and 7.3.7 pursuant to Section 39.5(7)(b) of the Act:

VOM and HAP emissions (ton/mo and ton/yr).

#### 7.3.10 Reporting Requirements

- a. Pursuant to 40 CFR 63.428(d), the Permittee shall furnish reports for each affected tank as described by 40 CFR 60.115b(a):

After each inspection required by Condition 7.3.8(a) which finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects of the control requirements of Condition 7.3.5 and/or the inspection procedures of Condition 7.3.8(a), a report shall be furnished to the Illinois EPA within 30 days of the inspection. The report shall identify the affected tank and the reason why it did not meet the specifications in Conditions 7.3.5 and/or 7.3.8(a).

- b. Pursuant to 40 CFR 63.428(g)(2), the Permittee shall include in a semiannual report the periodic reports of Condition 7.3.10(a).

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Changes in the material stored in a tank. The Permittee is authorized to store materials with a vapor pressure less than 0.75 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any affected tank identified in this permit as a VOL storage tank. In such instances, the unit-specific permit conditions in Section 7.3 of this permit applicable to such tank based on the storage of VOL shall no longer apply. [40 CFR63.423]
- b. If any storage tank identified in this permit as storing VOL changes to storage of materials with a

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vapor pressure of less than 0.75 psia at 70°F, the Permittee shall maintain a record identifying the specific tank, the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VOL.

- c. Upon resuming storage of VOL in the affected tank, the applicable unit specific conditions of Section 7.3 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VOL, the Permittee shall conduct an appropriate inspection of the tank for storage of VOL. [40 CFR 63.425(d)]

#### 7.3.12 Compliance Procedures

Emissions from the affected storage tanks shall be determined through the use of the most current version of the TANKS program.

7.4 Unit: Group III Storage Tanks - Internal Floating Roof Petroleum Liquid Storage Tank

7.4.1 Description

The Permittee operates an internal floating roof storage tank built in March 1979 and equipped with a vapor mounted resilient primary seal that stores various petroleum liquids. A rim mounted secondary seal was added in 1997 to comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP) control requirements for Gasoline Distribution Facilities. Permanent submerged loading must be used at this tank, minimizing turbulence and evaporation of VOM during loading.

7.4.2 List of Emission Units and Pollution Control Equipment<sup>1</sup>

Storage Tank	Description	Emission Control Equipment
TK 420	IFR Tank	Floating Roof, VMR Primary Seal, RM Secondary Seal, and a PSL Pipe

<sup>1</sup> See Table 1-1 for more details.

7.4.3 Applicability Provisions

- a. The "affected tank" for the purpose of these unit-specific conditions, is an internal floating roof petroleum liquid storage tank, used for the storage of petroleum liquids, with a storage capacity greater than 151,416 liters (40,000 gallons), for which construction, reconstruction, or modification commenced after May 18, 1978 and prior to July 23, 1984, that is subject to the control requirements of 40 CFR Part 60, Subpart Ka, and that relies on an internal floating roof for compliance. The tank is also equipped with a secondary seal to comply with 40 CFR 63.423(a) (GD MACT).
- b. The affected tank is subject to 40 CFR Part 60, Subpart Ka, and is hereby shielded from compliance with 35 IAC 219.121. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR Part 60, Subpart Ka, assures compliance with 35 IAC 219.121,

following the review of requirements of 40 CFR Part 60,  
Subpart Ka, and 35 IAC 219.121.

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

- a. This permit is issued based on the affected tank not being subject to 35 IAC 219.120, 219.127, 219.128, and 219.129, because the affected tank is used solely for the storage of petroleum liquids, pursuant to 35 IAC 219.119(e).
- b. This permit is issued based on the affected tank not being subject to 35 IAC 219.123(b), because the affected tank is subject to new source performance standards for storage vessels of petroleum liquid, 40 CFR Part 60, Subpart Ka, pursuant to 35 IAC 219.123(a)(5).
- c. This permit is issued based on the affected tank not being subject to 35 IAC 219.124(a), because the affected tank does not use an external floating roof.
- d. This permit is issued based on the affected tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks use a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

#### 7.4.5 Control Requirements

- a. The affected tank shall be equipped with a permanent submerged loading pipe. [35 IAC 219.122(b)]
- b. The affected tank shall be equipped with an internal floating roof with a continuous closure device between the tank wall and the cover edge. [40 CFR 60.112a(a)(2)]
- c. Pursuant to 40 CFR 63.423(a), the affected tank shall be equipped according to the requirements described in 40 CFR 60.112b(a)(1)(ii) and (iii):
  - i. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall

of the storage vessel and the edge of the internal floating roof, and

- ii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

7.4.6 Emission Limitations

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

N/A

7.4.7 Operating Requirements

The affected tank shall be operated to meet the following requirements: [40 CFR 63.423(a)]

- a. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112a(a)(2)]
- b. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. [40 CFR 60.112a(a)(2)].
- c. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. [40 CFR 60.112a(a)(2)].
- d. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being landed on the leg supports. [40 CFR 60.112a(a)(2)].
- e. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the

manufacturer's recommended setting. [40 CFR 60.112a(a)(2)].

- f. VOL stored in the affected tanks shall have a maximum true vapor pressure (TVP) equal to or greater than 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.1 psia) at 294.3°K (70°F). [40 CFR 60.112a(a)]

#### 7.4.8 Inspection Requirements

Pursuant to 40 CFR 63.425(d), the Permittee shall perform the following inspections on each affected tank as described in 40 CFR 60.113b(a):

- a. The Permittee shall perform one of the two following ongoing inspections:
  - i. Visually inspect the IFR, the primary seal, and the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Illinois EPA in the inspection report required in Condition 7.4.10. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take to minimize emissions and that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible; or
  - ii. Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals (if any) at least every 5 years during a time the storage vessel is emptied and degassed. If the

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internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL.

- b. Notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Condition 7.4.8(a)(ii) to afford the Illinois EPA the opportunity to have an observer present. If the inspection is not planned and the Permittee could not have known about the inspection 30 days in advance, the Permittee shall notify the Illinois EPA at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Illinois EPA at least 7 days prior to the refilling.

#### 7.4.9 Recordkeeping Requirements

Pursuant to 40 CFR 63.428(d), the Permittee shall keep records for each affected storage tank as described below and by 40 CFR 60.115b(a) and 40 CFR 60.115a(a):

- a. Keep a record of each inspection performed as required by Condition 7.4.8. Each record shall identify the affected tank on which the inspection was performed, the date the vessel was inspected, and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- b. Records of all inspections shall be kept for 5 years from the date of entry for each record.
- c. Records that are sufficient to identify whenever the tank is empty for any reason and the length of time it is out of service, or whenever repairs are made as a result of any inspection or incidence of roof damage or defect.
- d. In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tank to demonstrate compliance with Conditions 5.5.1 and 7.2.7 pursuant to Section 39.5(7)(b) of the Act:

VOM and HAP emissions (ton/mo and ton/yr).

#### 7.4.10 Reporting Requirements

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

- a. A report identifying any deficiencies or shortcomings identified in the Annual or Five-Year Inspection required by Condition 7.4.8(a), within 30 days of the inspection.
- b. Any storage of petroleum liquid in the affected tank that is not in compliance with the control

requirements due to absence of the features required by Condition 7.4.5, (e.g., no "secondary seal"), within five (5) days of becoming aware of the deviation status. This notification shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps to be taken to avoid future deviation.

- c. Any storage of petroleum liquid in the affected tank that is not in compliance with the control requirements (Condition 7.4.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the deviation status. This notification shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps to be taken to avoid future deviation.

#### 7.4.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Changes in the material stored in a tank. The Permittee is authorized to store materials with a vapor pressure less than 1.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any affected tank identified in this permit as a petroleum liquids storage tank. In such instances, the unit-specific permit conditions in Section 7.4 of this permit applicable to such tank based on the storage of petroleum liquids shall no longer apply. [40 CFR 60.112a(a)]
- b. If any storage tank identified in this permit as storing petroleum liquid changes to storage of materials with a vapor pressure of less than 1.5 psia at 70°F, the Permittee shall maintain a record identifying the specific tank, the liquid stored in the tank, the date such tank switched to the storage

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of this liquid, and if applicable, the date such tank returned to storage of petroleum liquid.

- c. Upon resuming storage of VPL in the affected tank, the applicable unit specific conditions of Section 7.4 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of petroleum liquid, the Permittee shall conduct an appropriate inspection of the tank for storage of petroleum liquid. [40 CFR 63.425(d)]

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#### 7.4.12 Compliance Procedures

Emissions from the affected tank shall be determined through the use of an approved USEPA methodology, such as the TANKS program.

7.5 Unit: Fugitives From Leaking Components  
 Control: None

7.5.1 Description

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

7.5.2 List of Emission Equipment and Pollution Control Equipment

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

7.5.3 Applicability Provisions

Pursuant to 35 IAC 219.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of VOL with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions.

7.5.4. Non-Applicable Regulations

N/A

7.5.5 Control Requirements

None

7.5.6 Emission Limitations

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

7.5.7 Operating Requirements

The Permittee shall repair any component from which a leak

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

7.5.8 Inspection Requirements

- a. The Permittee shall visually inspect for leaks from all affected equipment components on a monthly basis.
- b. If a significant leak is detected by any means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs within 15 days.

7.5.9 Recordkeeping Requirements

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

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

7.5.10 Reporting Requirements

None

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

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

None

7.5.12 Compliance Procedures

Compliance with the fugitive VOM emission limitations of Condition 7.5 and pursuant to the overall VOM emissions limitation of Condition 5.5 shall be demonstrated through the calculation of the following equation:

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

Where:

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

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

<sup>a</sup> Light liquid - not in gas/vapor service or heavy liquid service.;

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

<sup>c</sup> Vapor - material in a gaseous state at operating conditions; and

<sup>d</sup> Other means any components other than connectors, valves, open-ended lines, and pump seals

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

Total annual emissions, in tons/year, shall be

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calculated by multiplying the hourly emission by 8760 hr/year.

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

Total fugitive HAP emissions will be based on the sum of the emissions for each individual HAP.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after \_\_\_\_\_ **{insert public notice start date}** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

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

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

### 8.3 Emissions Trading Programs

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

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

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

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

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

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

#### 8.5 Testing Procedures

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

#### 8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

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

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

#### 8.6.3 Test Reports

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

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

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

- Illinois Environmental Protection Agency  
Division of Air Pollution Control

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Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

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

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

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

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iv. USEPA Region 5 - Air Branch

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

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

## 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.

### 9.2 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

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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 compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certifications shall include descriptions of means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements and permit conditions. 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

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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 - Summary of Storage Tank Features and Groupings

TABLE 1-1

Group/Tank No.	Storage Capacity (Bbls)	Tank Type	Primary Seal <sup>1</sup>	Secondary Seal	Products Stored	Max TVP (psia @ 70°F)	Date Built
<b>Group I</b>							
TK-401	80,000	IFR	Vapor Mounted (VM) Resilient	Rim-Mounted	Various Petroleum	12.5	1954
TK-404	80,000	IFR	VM Resilient	Rim-Mounted	Various Petroleum	12.5	1954
TK-406	55,000	IFR	VM Resilient	VM Rubber Wiper	Various Petroleum	12.5	1954
TK-410	2,000	IFR	VM Resilient	Rim-Mounted	Various Petroleum	12.5	1954
TK-411	80,000	IFR	VM Resilient	Rim-Mounted	Various Petroleum	12.5	1954
TK-421	80,000	IFR	VM Resilient	VM Rubber Wiper	Various Petroleum	12.5	1954
<b>Group II</b>							
TK-402	80,000	IFR	Mechanical Shoe	Rim-Mounted	Various Petroleum	11.1	1954 Modified with IFR in 2000
TK-412	80,000	IFR	Mechanical Shoe	Rim-Mounted	Various Petroleum	11.1	1954 Modified with IFR in 2000

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<b>Group III</b>							
TK-420	15,000	IFR	VM Resilient	Rim-Mounted	Various Petroleum	11.1	March 1979

<sup>1</sup> Use of equivalent emission control equipment is allowed without permit modification.

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10.2 Attachment 2 - Example Certification by a Responsible Official

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

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

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

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

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

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

10.3 Attachment 3 - Guidance on Revising This Permit

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

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

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

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification

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

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request

that such procedures be used; and

- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

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

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

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

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



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

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

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

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

<b>Owner Information</b>		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

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

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

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

### Summary Of Application Contents

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

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

### Signature Block

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

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

10.5 Attachment 5 - Guidance on Renewing This Permit

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

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

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

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official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

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

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

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

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

FINAL DRAFT/PROPOSED CAAPP PERMIT  
Conoco Inc., Wood River Products Terminal  
I.D. No.: 119050AAN  
Application No.: 95100127  
July 23, 2002

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

Mail renewal applications to:

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

I. INTRODUCTION

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

This Conoco Inc., Wood River Products Terminal is located at 2150 South Delmar Avenue, Hartford, Madison County, Illinois. The source serves as a bulk petroleum terminal for receipt and distribution of various petroleum products. The terminal receives refined petroleum products and petroleum blend stocks from pipeline, stores material in bulk storage tanks, then redistributes through two modes of transportation: transport cargo tanks for surface/highway transportation via truck loading rack, and to other pipeline systems.

The Wood River Products Terminal handles the following types of petroleum products: gasoline (all grades), jet fuels (all grades), butane/isobutene, propane, natural gasoline, petroleum transmixes, and oil/water mixes. All activities and processes undertaken at the site either directly, or indirectly, support the primary function of petroleum products receipt and distribution.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Built	Emission Control Equipment
Tank Truck Loading Rack (LR-1)	Loads Petroleum Products and Blend Stock Onto Tank Trucks	1954	Truck Loading Rack Flare (Added in 1988) (EP-1)
Group I Storage Tanks	Internal Floating Roof (IFR) Storage Tanks	1954	Floating Roof with Primary Seal and Rim-Mounted (RM) Secondary Seal, Permanent Submerged Loading
Group II Storage Tanks	Modified IFR Storage Tanks	1954	Floating Roof with Both Primary and Secondary Seals, Permanent Submerged Loading
Group III Storage Tanks	IFR Storage Tanks	March 1979	Floating Roof with Primary Seal and RM Secondary Seal, Permanent Submerged Loading
Fugitive Emissions	Equipment Components - Processing of Material Throughout Piping System	N/A	Work Practices and Equipment Replacement

III. EMISSIONS

This source is required to have a CAAPP permit since it is both a major source of VOM and HAP emissions.

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	118.6
Sulfur Dioxide (SO <sup>2</sup> )	----
Particulate Matter (PM)	----
Nitrogen Oxides (NO <sub>x</sub> )	3.3
HAP, Not Included in VOM or Particulate Matter	----
Total	121.9

This permit is a combined Title I/CAAPP permit that may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the Clean Air Act and regulations promulgated thereunder, including 40 CFR 52.21 - federal Prevention of Significant Deterioration (PSD) and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the permit by T1, T1R, or T1N. The source has requested that the Illinois EPA establish or revise such conditions in a Title I permit, consistent with the information provided in the CAAPP application. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

IV. APPLICABLE EMISSION STANDARDS

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

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

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

V. PROPOSED PERMIT

CAAPP

A CAAPP permit contains all conditions that apply to a source and a listing of the applicable state and federal air pollution control regulations that are the origin of the conditions. The permit also

contains emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis.

#### Title I

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

#### VI. REQUEST FOR COMMENTS

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

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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