FINAL DRAFT/PROPOSED CAAPP PERMIT
The Peoples Gas Light and Coke Company, Manlove Storage Field
I.D. No.: 019813AAA
Application No.: 95120163
November 20, 2002

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

The Peoples Gas Light and Coke Company
Attn: Director of Environmental Affairs
130 East Randolph Drive, 20th Floor
Chicago, Illinois 60601-6207

Application No.: 95120163 I.D. No.: 019813AAA
Applicant's Designation: Date Received: December 11, 1995
Operation of: Natural Gas Transmission Station
Date Issued: TO BE DETERMINED Expiration Date[2]: DATE
Source Location: 230 East County Road 2800 North, Fisher, Champaign, IL 61843
Responsible Official: William E. Morrow, Director of Gas Supply

This permit is hereby granted to the above-designated Permittee to OPERATE a natural gas transmission station, 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 John Cashman at 217/782-2113.

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

DES:JRC:ELK:psj

cc: Illinois EPA, FOS, Region 3
USEPA

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

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

The Peoples Gas Light and Coke Company, Manlove Storage Field
230 East County Road 2800 North
Fisher, Illinois 61843
217/897-7100

I.D. No.: 019813AAA

Standard Industrial Classification: 4922, Natural Gas Transmission

1.2 Owner/Parent Company

The Peoples Gas Light and Coke Company
130 East Randolph Drive, 20th Floor
Chicago, Illinois 60601-6207

1.3 Operator

The Peoples Gas Light and Coke Company
130 East Randolph Drive, 20th Floor
Chicago, Illinois 60601-6207

Tim Koller, Plant Superintendent
217/897-7100

1.4 General Source Description

The Peoples Gas Light and Coke Company is located at 230 East County Road 2800 North in Fisher. The source operates compressors, dehydration units, generators and storage fields for the transmission of natural gas.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
EGU	electrical generating unit(s)
ERMS	Emissions Reduction Market System (35 IAC Part 205)
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mmBtu	Million British thermal units
Mg	megagram or metric ton
MW	megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSSA	new source set-aside
ORIS	Office of Regulatory Information System
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration (40 CFR 52.21)
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T	ton (2000 pounds)
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit

USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

- Alcohol Tank (T-11)
- Alcohol Tank (T-13)
- Alcohol Tank (T-15)
- CO_2 Removal Operation Plant Liquids Tank (T-26)
- Dehy Area Waste Tank (T-12)
- Diesel Fuel Tank (T-16)
- Dirty Glycol Tank (T-10)
- Engine Coolant Tank (T-18)
- Fire Water Tank Heater
- Fresh Glycol Tank (T-14)
- HW Boiler Compressor Building #2 and #4 (B-CB2 and B-CB4)
- Indirect Heaters < 10 mmBtu/hr (IND HTR < 10)
- Line Heater (LINE HTR)
- Lagoon Heater (H-L)
- Liquid Natural Gas (LNG) Boiler Building Spill Tank (T-25)
- LNG Fuel Gas Heater and LNG Fuel Gas Heater South (H-LF1 and H-LF2)
- Main Shop Waste Tank (T-19)
- North Steam Boiler and South Steam Boiler (B-N and B-S)
- Reclaimed Glycol Tanks (T-3 and T-4
- Station Fuel Gas Heater (H-SF1)
- Trunkline Heater (TNKLN HTR)
- Triethylene Glycol Reclaimer No. 1 (combustion exhaust)
- Triethylene Glycol Reclaimer No. 1 (process exhaust)

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:

- Crankcase VOM Emissions from Caterpillar Generators, Clark Compressors, and Cooper Compressors - 35 IAC 201.210(a)(3)
- Compressors - 35 IAC 201.210(a)(2)
- Odorant Tank (T-5) with odorant flare. The flare used on the tank is considered to be odor control equipment and not a separate piece of air pollution control equipment. - 35 IAC 201.210(a)(2)

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

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

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

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

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

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

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

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

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

3.2 Compliance with Applicable Requirements

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

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

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

4.0 Significant Emission Units at This Source

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Cooper Compressor #1 – 9.6 mmBtu/hr Natural Gas Fired Engine	1972	None
	Clark Compressor #2 – 9.6 mmBtu/hr Natural Gas Fired Engine	1965/1966	None
	Clark Compressor #3 – 9.6 mmBtu/hr Natural Gas Fired Engine	1965/1966	None
	Clark Compressor #4 – 9.6 mmBtu/hr Natural Gas Fired Engine	1967	None
	Clark Compressor #5 – 33 mmBtu/hr Natural Gas Fired Engine	1969	None
	Cooper Compressor #6 – 32.8 mmBtu/hr Natural Gas Fired Engine	1977	None
	Waukesha Generator #1 – 9.4 mmBtu/hr Natural Gas Fired Engine	1972	None
	Waukesha Generator #2 – 9.4 mmBtu/hr Natural Gas Fired Engine	1972	None
	Waukesha Generator #3 – 9.4 mmBtu/hr Natural Gas Fired Engine	1972	None
	Waukesha Generator #4 – 9.4 mmBtu/hr Natural Gas Fired Engine	1972	None
	Caterpillar Generator #1 – 4.5 mmBtu/hr Natural Gas Fired Engine	1978	None
	Caterpillar Generator #2 – 4.5 mmBtu/hr Natural Gas Fired Engine	1978	None
02	West Inlet Natural Gas Fired 11.2 mmBtu/hr Indirect Heater	1984/1985	None
	North East Natural Gas Fired 28 mmBtu/hr Indirect Heater	1972	None
	South East Natural Gas Fired 28 mmBtu/hr Indirect Heater	1979	None
03	LNG Natural Gas Fired 18 mmBtu/hr Regeneration Heater	1999	None
	South Inlet Natural Gas Fired 26.6 mmBtu/hr Indirect Heater	1989	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #1	1993	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
03 (Cont.)	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #2	1993	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #3	1993	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #4	1993	None
	CO2 Natural Gas Fired 33 mmBtu/hr Removal Regeneration Heater	1995	None
04	Dehydrator and Glycol Reboiler #1 – 0.67 mmBtu/hr Natural Gas Fired	1966	Thermal Oxidizer #1
	Dehydrator and Glycol Reboiler #2 – 0.67 mmBtu/hr Natural Gas Fired	1966	Thermal Oxidizer #2
	Dehydrator and Glycol Reboiler #3 – 0.67 mmBtu/hr Natural Gas Fired	1967	Thermal Oxidizer #3
	Dehydrator and Glycol Reboiler #4 – 1.33 mmBtu/hr Natural Gas Fired	1968	Thermal Oxidizer #4
	Dehydrator and Glycol Reboiler #5 – 1.33 mmBtu/hr Natural Gas Fired	1972	Thermal Oxidizer #5
	Dehydrator and Glycol Reboiler #6 – 1.25 mmBtu/hr Natural Gas Fired	1974	Thermal Oxidizer #6
	Dehydrator and Glycol Reboiler #7 – 1.25 mmBtu/hr Natural Gas Fired	1977	Thermal Oxidizer #7
	Dehydrator and Glycol Reboiler #8 – 2.66 mmBtu/hr Natural Gas Fired	1989	Thermal Oxidizer #8

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 NOx, CO, and VOM emissions.

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

5.2 Applicable Regulations

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

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

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

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

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

5.2.3 Ozone Depleting Substances

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

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

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

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

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

5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

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

5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the

Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

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

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the

following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	425.03
Sulfur Dioxide (SO_2)	2.19
Particulate Matter (PM)	45.30
Nitrogen Oxides (NO_x)	1,913.84
HAP, not included in VOM or PM	-----
Total	2,386.36

5.5.2 Emissions of Hazardous Air Pollutants

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

5.5.3 Other Source-Wide Emission Limitations

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

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with

Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

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

5.6.2 Records for Operating Scenarios

N/A

5.6.3 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of 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.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

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

6.0 [NOT APPLICABLE TO THIS PERMIT]

7.0 UNIT SPECIFIC CONDITIONS

7.1 Engines (4-Stroke and 2-Stroke Lean Burn)

7.1.1 Description

The engines are process emission units used to provide power for the natural gas compressors and to provide power to electric generators. All engines are powered by natural gas.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Cooper Compressor #1 – 9.6 mmBtu/hr Natural Gas Fired Engine	None
	Clark Compressor #2 – 9.6 mmBtu/hr Natural Gas Fired Engine	None
	Clark Compressor #3 – 9.6 mmBtu/hr Natural Gas Fired Engine	None
	Clark Compressor #4 – 9.6 mmBtu/hr Natural Gas Fired Engine	None
	Clark Compressor #5 – 33 mmBtu/hr Natural Gas Fired Engine	None
	Cooper Compressor #6 – 32.8 mmBtu/hr Natural Gas Fired Engine	None
	Waukesha Generator #1 – 9.4 mmBtu/hr Natural Gas Fired Engine	None
	Waukesha Generator #2 – 9.4 mmBtu/hr Natural Gas Fired Engine	None
	Waukesha Generator #3 – 9.4 mmBtu/hr Natural Gas Fired Engine	None
	Waukesha Generator #4 – 9.4 mmBtu/hr Natural Gas Fired Engine	None
	Caterpillar Generator #1 – 4.5 mmBtu/hr Natural Gas Fired Engine	None
	Caterpillar Generator #2 – 4.5 mmBtu/hr Natural Gas Fired Engine	None

7.1.3 Applicability Provisions and Applicable Regulations

a. The “affected engines” for the purpose of these unit-specific conditions, are engines described in Conditions 7.1.1 and 7.1.2.

b. Each affected engine is subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm [35 IAC 214.301].

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected engines not being subject to the requirements of 35 IAC 212.321 or 212.322, because due to the unique nature of these units, a process weight rate can not be set so that such rules can not reasonably be applied.

7.1.5 Operational and Production Limits and Work Practices

a. Natural gas shall be the only fuel fired in the affected engines.

7.1.6 Emission Limitations

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

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

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

a. Engine rating for each affected engine, hp.

b. Operating hours for each affected engine, hrs/month and hrs/yr.

c. Emissions of each pollutant from the affected engines with supporting calculations including documentation on the validity of the emission factors used, ton/month and ton/yr.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected engines 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. Emissions from or operation of an affected engine in excess of the limits specified in Conditions 7.1.3 and 7.1.5 within 30 days of such occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

a. Compliance with Condition 7.1.3(c) is demonstrated by proper operating conditions of the affected engines.

b. Compliance with the emission limits in Conditions 5.5 and 7.1.6 shall be determined by using published emission factors, Illinois EPA approved stack test data, Illinois EPA approved measured emission factors, or approved manufacturer’s data and the recordkeeping requirements in Condition 7.1.9.

7.2 Indirect Pipeline Heaters (Non-NSPS)

7.2.1 Description

The indirect pipeline heaters are fuel combustion emission units used to provide for indirect heating of pipeline natural gas to prevent hydrate formation as gas is withdrawn from storage. The pipeline heaters burn natural gas as the fuel.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
02	West Inlet Natural Gas Fired 11.2 mmBtu/hr Indirect Heater	None
	North East Natural Gas Fired 28 mmBtu/hr Indirect Heater	None
	South East Natural Gas Fired 28 mmBtu/hr Indirect Heater	None

7.2.3 Applicability Provisions and Applicable Regulations

a. The “affected pipeline heaters” for the purpose of these unit-specific conditions, are fuel combustion emission units described in Conditions 7.2.1 and 7.2.2.

b. The affected pipeline heaters are subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 10 mmBtu/hr to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected pipeline heaters not being subject to the New Source Performance Standards (NSPS) for Small Industrial - Commercial - Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc, because the affected pipeline heaters’ construction, modification, or reconstruction was commenced before June 9, 1989.

b. The provisions of 35 IAC 215.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 215.303].

c. The affected pipeline heaters are not subject to the requirements of the NOx Compliance Programs of 35 IAC Part 217 because the affected pipeline heaters have nameplate capacities of less than 25 MWe.

7.2.5 Operational and Production Limits and Work Practices

a. Natural gas shall be the only fuel fired in the affected pipeline heaters.

7.2.6 Emission Limitations

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

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected pipeline heaters to demonstrate compliance with Conditions 5.5.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

a. Natural gas fuel usage for the affected pipeline heaters, scf/month and scf/yr.

b. Emissions of each pollutant from the affected pipeline heaters with supporting calculations including documentation on the validity of the emission factors used, ton/month and ton/yr.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected pipeline heaters 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. Emissions from or operation of an affected pipeline heater in excess of the limits specified in Conditions 7.2.3 and 7.2.5 within 30 days of such occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

a. Compliance with Condition 7.2.3(c) is demonstrated by proper operating conditions of the affected pipeline heaters.

b. Compliance with the emission limits in Conditions 5.5 7.2.6 shall be determined by using published emission factors, Illinois EPA approved stack test data, Illinois EPA approved measured emission factors, or approved manufacturer’s data and the recordkeeping requirements in Condition 7.2.9.

7.3 Natural Gas Fired Units (NSPS)

7.3.1 Description

The natural gas fired units are comprised of indirect heaters to prevent hydrate formation, LNG regeneration heaters to heat regeneration gas in the CO2 removal process, and LNG vaporizer boilers used to warm LNG prior to withdrawal from storage. These units are all natural gas fired units.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
03	LNG Natural Gas Fired 18 mmBtu/hr Regeneration Heater	None
	South Inlet Natural Gas Fired 26.6 mmBtu/hr Indirect Heater	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #1	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #2	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #3	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #4	None
	CO2 Natural Gas Fired 33 mmBtu/hr Removal Regeneration Heater	None

7.3.3 Applicability Provisions and Applicable Regulations

a. The “affected natural gas fired units” for the purpose of these unit-specific conditions, is a heater described in Conditions 7.3.1 and 7.3.2.

b. The affected natural gas fired units are subject to the emission limits identified in Condition 5.2.2.

c. The affected natural gas fired units are subject to the NSPS for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60 Subparts A and Dc, because the construction, modification, or reconstruction is commenced after June 9, 1989 and has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to

2.9 MW (10 million Btu/hr). The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA. The Permittee must comply with 40 CFR 60.48c(g), which is addressed in Condition 7.3.9(a).

d. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 10 mmBtu/hr to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.3.4 Non-Applicability of Regulations of Concern

a. The provisions of 35 IAC 218.301 and 302, Use of Organic Material, shall not apply to fuel combustion emission sources [35 IAC 218.303].

b. The affected natural gas fired units are not subject to the requirements of the NOx Compliance Programs of 35 IAC Part 217 because the affected natural gas fired units have nameplate capacities of less than 25 MWe.

7.3.5 Operational and Production Limits and Work Practices

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

b. Natural gas shall be the only fuel fired in the affected natural gas fired units.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected natural gas fired units are subject to the following:

a. Emissions from the affected LNG Regeneration Heater shall not exceed the following limits:

Pollutant	(Ton/Year)
NOx	11.0
CO	2.8

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

The above limitations were established in Permit 99060062, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

b. Emissions from the affected CO2 Removal Regeneration Heater shall not exceed the following limits:

Pollutant	(Ton/Year)
NOx	12.60
CO	50.088
PM	1.67
VOM	0.71

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

The above limitations were established in Permit 95050187, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

c. Emissions from each of the four affected LNG Vaporizer Boilers shall not exceed the following limits:

Pollutant	(Ton/Year)
NO_x	0.82

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

The above limitations were established in Permits 93010049 and 73100103, pursuant to 40 CFR 52.21,

Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected natural gas fired units to demonstrate compliance with Conditions 5.5.1 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

a. Natural gas fuel usage for the affected natural gas fired units, scf/day, scf/month, and scf/yr.

b. Emissions of each pollutant from the affected natural gas fired units with supporting calculations including documentation on the validity of the emission factors used, ton/month and ton/yr.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected natural gas fired units 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. Emissions from or operation of an affected heater in excess of the limits specified in Conditions 7.3.3, 7.3.5, and 7.3.6 within 30 days of such occurrence.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

a. Compliance with Condition 7.3.3(d) is considered to be assured by the normal work practices and

maintenance activities inherent in operation of the affected natural gas fired units.

b. Compliance with the emission limits in Conditions 5.5 7.3.6 shall be determined by using published emission factors, Illinois EPA approved stack test data, Illinois EPA approved measured emission factors, or approved manufacturer’s data and the recordkeeping requirements in Condition 7.3.9.

7.4 TEG Dehydration Units (Thermal Oxidizer Controlled)

7.4.1 Description

These triethylene glycol (TEG) dehydration units are process emission units used primarily to separate products and remove contaminants from the natural gas.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
04	Dehydrator and Glycol Reboiler #1 – 0.67 mmBtu/hr Natural Gas Fired	Thermal Oxidizer #1
	Dehydrator and Glycol Reboiler #2 – 0.67 mmBtu/hr Natural Gas Fired	Thermal Oxidizer #2
	Dehydrator and Glycol Reboiler #3 – 0.67 mmBtu/hr Natural Gas Fired	Thermal Oxidizer #3
	Dehydrator and Glycol Reboiler #4 – 1.33 mmBtu/hr Natural Gas Fired	Thermal Oxidizer #4
	Dehydrator and Glycol Reboiler #5 – 1.33 mmBtu/hr Natural Gas Fired	Thermal Oxidizer #5
	Dehydrator and Glycol Reboiler #6 – 1.25 mmBtu/hr Natural Gas Fired	Thermal Oxidizer #6
	Dehydrator and Glycol Reboiler #7 – 1.25 mmBtu/hr Natural Gas Fired	Thermal Oxidizer #7
	Dehydrator and Glycol Reboiler #8 – 2.66 mmBtu/hr Natural Gas Fired	Thermal Oxidizer #8

7.4.3 Applicability Provisions and Applicable Regulations

a. The “affected TEG dehydration units” for the purpose of these unit-specific conditions, are TEG dehydration units as described in Conditions 7.4.1 and 7.4.2.

b. The affected TEG dehydration units are subject to the emission limits identified in Condition 5.2.2.

c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into

the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart G shall apply only to photochemically reactive material [35 IAC 215.301].

e. Startup Provisions

The Permittee is authorized to operate an affected TEG dehydration unit in violation of the applicable limit of 35 IAC 215.301 during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

i. This authorization only extends for a period of up to 24-hours following initial firing of fuel during each startup event.

ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups, and minimize the frequency of startups:

A. Implementation of established startup procedures, including, when igniting the oxidizer, allowing the thermal oxidizer to reach operating temperature, starting pumps to begin the circulation of triethylene glycol through the absorption column, starting burners to bring reboilers to operating temperature, opening valves to start the flow of “wet” natural gas to the dehydration process.

B. Bringing the thermal oxidizer to manufacturer’s recommended temperature but not lower than 1400° F before starting the dehydration unit.

C. The duration of start-up time is fixed by the maximum allowable heating rate for the refractory.

D. Retaining at least two dehydration unit components on-line at any given time at approximately 50% capacity each, to provide additional flexibility in the event that additional capacity is needed at short notice.

iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.4.9(d).

e. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of a thermal oxidizer, the Permittee is authorized to continue operation of the affected TEG dehydration units without the thermal oxidizer in violation of the applicable requirement of 35 IAC 215.301, as necessary to provide essential service, i.e. prevent interruption in or shortage of the public's natural gas supply, provided that operation shall not be continued solely for the economic benefit of the Permittee. This authorization is subject to the following requirements:

i. The Permittee shall remove the affected TEG dehydration units from service or repair the thermal oxidizer as soon as practicable. This shall be accomplished within three days unless the Permittee obtains an extension, from the Regional Office of the Illinois EPA. The request for such extension must document that the thermal oxidizer is unavailable and specify a schedule of actions taken that will assure the feature(s) will be repaired or remove the affected dehydration units from services as soon as possible.

ii. The Permittee shall reduce operation of the affected units to the extent that natural gas may reasonably be supplied from the Permittee's other storage fields.

iii. The Permittee shall fulfill the applicable recordkeeping and reporting requirements of Conditions 7.4.9(f) and 7.4.10(b).

7.4.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected TEG dehydration units not being subject to the requirements of 35 IAC 212.321 or 212.322, because due to the unique nature of these units, a process weight rate can not be set so that such rules can not reasonably be applied.

b. The affected dehydration units are not subject to National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart HHH: Natural Gas Transmission and Storage Facilities, because the affected TEG dehydration units are located in an

existing local distribution company that transmit and store natural gas.

7.4.5 Operational and Production Limits and Work Practices

a. Natural gas shall be the only fuel fired in the affected TEG dehydration units; including the associated thermal oxidizers.

b. At all times, the Permittee shall to the extent practicable, maintain and operate the thermal oxidizers, in a manner consistent with good air pollution control practice for minimizing emissions. For this purpose control efficiency of the thermal oxidizers shall achieve at least 85 percent.

c. Upon completion of start-up and achievement of normal operation, the afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1,400^{o} F, before each dehydration process is begun; this temperature shall be maintained during each dehydration process.

d. Notwithstanding 35 IAC 215.106, seasonal shutdown of each thermal oxidizer from November 1 through March 31 of the following year is not allowed.

e. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the pollution control equipment covered under this permit such that the pollution control equipment be kept in proper working condition and not cause a violation of the Environmental Protection Act or regulations promulgated therein.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected TEG dehydration units subject to the following:

a. Emissions from the affected TEG dehydration units shall not exceed the following limits:

Unit	Pollutant	(Lb/Hour)	(Ton/Year)
1	VOM	6.57	16.56
2	VOM	6.57	16.56
3	VOM	6.57	16.56
4	VOM	12.81	32.28
5	VOM	12.81	32.28
7	VOM	16.20	40.82
8	VOM	16.20	40.82

Unit	Pollutant	(Lb/Hour)	(Ton/Year)
1	NO_x	0.77	1.94
2	NO_x	0.77	1.94
3	NO_x	0.77	1.94
4	NO_x	1.00	2.53
5	NO_x	1.00	2.53
7	NO_x	1.09	2.75
8	NO_x	1.23	3.10
1	CO	0.16	0.41
2	CO	0.16	0.41
3	CO	0.16	0.41
4	CO	0.21	0.30
5	CO	0.21	0.30
7	CO	0.23	0.58
8	CO	0.26	0.66
1	PM	0.093	0.24
2	PM	0.093	0.24
3	PM	0.093	0.24
4	PM	0.12	0.30
5	PM	0.12	0.30
7	PM	0.13	0.33
8	PM	0.15	0.38

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

The above limitations were established in Permit 9507125, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

b. Emissions from the affected TEG dehydration unit shall not exceed the following limits:

Unit	Pollutant	(Lb/Hour)	(Ton/Year)
6	VOM	3.6	5.44
6	NO_x	0.36	0.54

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

The above limitations were established in Permit 94100131, pursuant to 40 CFR 52.21, Prevention of

Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

a. Each thermal oxidizer shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for each thermal oxidizer combustion chamber temperature. The Permittee shall retain all records of equipment operation and strip charts or disk storage for at least one year from the date of occurrence. These records shall be available for inspection by the Agency.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected TEG dehydration units to demonstrate compliance with Conditions 5.5.1 and 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

a. Natural gas fuel usage for the affected TEG dehydration units, scf/month and scf/yr.

b. Log of maintenance of the thermal oxidizers, which demonstrate proper operation as required in Condition 7.4.5.

c. Emissions of VOM, NOx, CO, and PM from the affected TEG dehydration units including parameters used and pertinent supporting data as described in Condition 7.4.12, ton/mo and ton/yr.

d. Records for Startup

The Permittee shall maintain the following records, pursuant to Section 39.5(7)(b) of the Act, for each affected TEG dehydration unit subject to Condition 7.1.3(f), which at a minimum shall include:

i. The following information for each startup of each affected TEG dehydration unit:

A. Date and duration of the startup, i.e., start time and time normal operation achieved, i.e., each affected TEG dehydration unit stable operation at load.

B. If normal operation was not achieved within 14 days, an explanation why startup could not be achieved in 14 days.

C. A detailed description of the startup, including reason for operation.

D. An explanation why established startup procedures could not be performed, if not performed.

E. The nature of VOM emissions, i.e., severity and duration, during the startup and the nature of VOM emissions at the conclusion of startup, if above normal.

F. Whether exceedance of Condition 5.2.2 may have occurred during startup, with explanation and estimated duration (minutes).

ii. A maintenance and repair log for each affected TEG dehydration units, listing each activity performed with date.

f. Records for Malfunctions and Breakdowns

The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of the affected TEG dehydration units controlled by the thermal oxidizer subject to 34 IAC 215.301 during malfunctions and breakdown of the thermal oxidizer, which as a minimum, shall include:

i. Date and duration of malfunction or breakdown.

ii. A detailed explanation of the malfunction or breakdown.

iii. An explanation why the damaged feature(s) could not be immediately repaired without risk of injury to personnel or severe damage to equipment.

iv. The measures used to reduce the quantity of emissions and the duration of the event.

v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.

vi. The amount of release above typical emissions during malfunction/breakdown.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected TEG dehydration units 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. Emissions from or operation of the affected TEG dehydration units in excess of the limits specified in Conditions 7.4.3, 7.4.5, and 7.4.6 within 30 days of such occurrence.

b. Reporting of Malfunctions and Breakdowns

The Permittee shall provide the following notification and reports to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to 35 IAC 201.263, concerning continued operation for more than one hour of an affected TEG dehydration unit controlled by a thermal oxidizer subject to Condition 7.4.3(e) during malfunction or breakdown of the control features of the thermal oxidizers.

i. The Permittee shall notify the Illinois EPA's regional office by telephone as soon as possible during normal working hours, but no later than three days, upon the occurrence of noncompliance due to malfunction or breakdown.

ii. Upon achievement of compliance, the Permittee shall give a written follow-up notice to the Illinois EPA, Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation of the affected dehydration units was necessary, the length of time during which operation continued under such conditions, the measures taken by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed.

iii. If compliance is not achieved within five working days of the occurrence, the Permittee shall submit an interim status reports to the

Illinois EPA, Compliance Section and Regional Field Office, within five days of the occurrence. This interim report shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.4.12 Compliance Procedures

a. Compliance with Conditions 7.4.3(c) and (d) is demonstrated by proper operating conditions of the affected TEG dehydration units.

b. Compliance with the emission limits in Conditions 5.5 and 7.4.6 shall be based on the recordkeeping requirements in Condition 7.4.9 and the emission factors and formulas listed below:

i. For purposes of calculating VOM emissions, the current version of the GRI-GLYCalc[1] estimated air emissions program or other comparable emission determination method is acceptable. The minimum control efficiency of the thermal oxidizer is assumed to be 85% efficient.

* 1 - GRI-GLYCalc model was developed by Radian Corporation for the Gas Research Institute (GRI) specifically for estimating BETX/VOM emissions from TEG and ethylene glycol dehydration units.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

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

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

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

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

   i. Describe the physical or operational change;

   ii. Identify the schedule for implementing the physical or operational change;

   iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

   iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

   v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

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

8.6.3 Test Reports

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

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

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

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (#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
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

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

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

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

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

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

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

Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

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

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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

10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.2 Attachment 2 - Guidance on Revising This Permit

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

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

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

1. Administrative Permit Amendment

- Corrects typographical errors;

- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

- Requires more frequent monitoring or reporting by the Permittee;

- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or

- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

- Are not modifications under any provision of Title I of the CAA;

- Are not required to be processed as a significant permit modification; and

- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

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

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- The source’s suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

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

3. Significant Permit Modification

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

- Applications requesting a significant change in existing monitoring permit terms or conditions;

- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

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

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

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

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

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

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

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

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

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

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

Source Information		
1. Source name:		
2. Source street address:		
3. City:		4. Zip code:
5. Is the source located within city limits?		☐ Yes ☐ No
6. Township name:	7. County:	8. I.D. number:

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

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

Applicant Information	
19. Who is the applicant? ☐ Owner ☐ Operator	20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ 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?	☐ Yes ☐ 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?	☐ Yes ☐ 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?	☐ Yes ☐ No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ 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.	☐ Yes ☐ 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?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application

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

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.

Authorized Signature:

BY:

_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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

10.4 Attachment 4 - Guidance on Renewing This Permit

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

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

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.

3. 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.

4. Information addressing any outstanding transfer agreement pursuant to the ERMS.

5. 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. 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.

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

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

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

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

Mail renewal applications to:

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

JRC:ELK:psj

I. INTRODUCTION

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

The Peoples Gas Light and Coke Company is located at 230 East County Road 2800 North in Fisher. The source operates compressors, dehydration units, generators and storage fields for the transmission of natural gas.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Cooper Compressor #1 – 9.6 mmBtu/hr Natural Gas Fired Engine	1972	None
	Clark Compressor #2 – 9.6 mmBtu/hr Natural Gas Fired Engine	1965/1966	None
	Clark Compressor #3 – 9.6 mmBtu/hr Natural Gas Fired Engine	1965/1966	None
	Clark Compressor #4 – 9.6 mmBtu/hr Natural Gas Fired Engine	1967	None
	Clark Compressor #5 – 33 mmBtu/hr Natural Gas Fired Engine	1969	None
	Cooper Compressor #6 – 32.8 mmBtu/hr Natural Gas Fired Engine	1977	None
	Waukesha Generator #1 – 9.4 mmBtu/hr Natural Gas Fired Engine	1972	None
	Waukesha Generator #2 – 9.4 mmBtu/hr Natural Gas Fired Engine	1972	None
	Waukesha Generator #3 – 9.4 mmBtu/hr Natural Gas Fired Engine	1972	None
	Waukesha Generator #4 – 9.4 mmBtu/hr Natural Gas Fired Engine	1972	None
	Caterpillar Generator #1 – 4.5 mmBtu/hr Natural Gas Fired Engine	1978	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
01 (Cont.)	Caterpillar Generator #2 – 4.5 mmBtu/hr Natural Gas Fired Engine	1978	None
02	West Inlet Natural Gas Fired 11.2 mmBtu/hr Indirect Heater	1984/1985	None
	North East Natural Gas Fired 28 mmBtu/hr Indirect Heater	1972	None
	South East Natural Gas Fired 28 mmBtu/hr Indirect Heater	1979	None
03	LNG Natural Gas Fired 18 mmBtu/hr Regeneration Heater	1999	None
	South Inlet Natural Gas Fired 26.6 mmBtu/hr Indirect Heater	1989	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #1	1993	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #2	1993	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #3	1993	None
	LNG Natural Gas Fired 67 mmBtu/hr Vaporizer Boiler #4	1993	None
	CO2 Natural Gas Fired 33 mmBtu/hr Removal Regeneration Heater	1995	None
04	Dehydrator and Glycol Reboiler #1 – 0.67 mmBtu/hr Natural Gas Fired	1966	Thermal Oxidizer #1
	Dehydrator and Glycol Reboiler #2 – 0.67 mmBtu/hr Natural Gas Fired	1966	Thermal Oxidizer #2
	Dehydrator and Glycol Reboiler #3 – 0.67 mmBtu/hr Natural Gas Fired	1967	Thermal Oxidizer #3
	Dehydrator and Glycol Reboiler #4 – 1.33 mmBtu/hr Natural Gas Fired	1968	Thermal Oxidizer #4
	Dehydrator and Glycol Reboiler #5 – 1.33 mmBtu/hr Natural Gas Fired	1972	Thermal Oxidizer #5
	Dehydrator and Glycol Reboiler #6 – 1.25 mmBtu/hr Natural Gas Fired	1974	Thermal Oxidizer #6
	Dehydrator and Glycol Reboiler #7 – 1.25 mmBtu/hr Natural Gas Fired	1977	Thermal Oxidizer #7
	Dehydrator and Glycol Reboiler #8 – 2.66 mmBtu/hr Natural Gas Fired	1989	Thermal Oxidizer #8

III. EMISSIONS

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

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

Pollutant	Tons/Year
Volatile Organic Material (VOM)	889.95
Sulfur Dioxide (SO_2)	1.90
Particulate Matter (PM)	45.91
Nitrogen Oxides (NO_x)	1,872.81
HAP, not included in VOM or PM	-----
Total	2,810.57

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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