

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

PROJECT SUMMARY for the
DRAFT CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Naval Station Great Lakes
201 Decatur Avenue, Great Lakes, Lake County, 60088-5600

Illinois EPA ID Number: 097811AAC

Application Number: 95120330

Application Type: Permit Renewal

Start of Public Comment Period: May 31, 2011

Close of Public Comment Period: June 30, 2011

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(This Project Summary generally describes the source and explains the draft permit. This document has been prepared pursuant to Section 39.5(8)(b) of the Illinois Environmental Protection Act, which requires "a statement that sets forth the legal and factual basis for the draft CAAPP permit conditions.")

I. INTRODUCTION

This source has applied for a renewal of the Clean Air Act Permit Program (CAAPP) operating permit. The CAAPP is the program established in Illinois for operating permits for significant stationary sources as required by Title V of the federal Clean Air Act and Section 39.5 of Illinois' Environmental Protection Act. The conditions in a CAAPP permit are enforceable by the Illinois Environmental Protection Agency (Illinois EPA), the USEPA, and the public. This document is for informational purposes only and does not shield the Permittee from enforcement actions or its responsibility to comply with applicable regulations. This document shall not constitute a defense to a violation of the Act or any rule or regulation.

A CAAPP permit contains conditions identifying the applicable state and federal air pollution control requirements that apply to a source. The permit also establishes emission limits, appropriate compliance procedures, and specific operational flexibility. The appropriate compliance procedures may include monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit. Further explanations of the specific provisions of the draft CAAPP permit are contained in the attachments to this document, which also identify the various emission units at the source.

II. GENERAL SOURCE DESCRIPTION

a. Nature of source

The Naval Training Center/Great Lakes is located at 201 Decatur Avenue, in Great Lakes and operates numerous different emission sources used for normal operation of the Training Center.

b. Ambient air quality status for the area

This source is located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment), PM_{2.5}, and attainment or unclassifiable for all other criteria pollutants (CO, lead, NO_x, SO₂).

c. Major source status

This permit is issued based on the source requiring a CAAPP permit as a major source of CO, NO_x, and SO₂ emissions.

d. Source emissions

The following table lists annual emissions of criteria pollutants from this source, as reported in the Annual Emission Reports sent to the Illinois EPA.

Pollutant	Annual Emissions (tons)				
	2005	2006	2007	2008	2009
CO	55.57	33.57	30.81	30.06	37.15
NOx	103.79	60.58	61.93	56.75	60.78
PM	5.67	5.65	2.78	5.00	5.31
SO2	2.46	2.36	0.25	1.62	1.31
VOM	14.19	7.9	9.01	11.79	7.76
HAP	3.95	4.17	2.64	---	---

III. NEW SOURCE REVIEW / TITLE I CONDITIONS

This draft permit contains terms and conditions that address the applicability of permit programs for new and modified sources under Title I of the Clean Air Act (CAA) and regulations promulgated thereunder, including 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within the draft permit by T1, T1R, or T1N. Any conditions established in a construction permit pursuant to Title I and not revised or deleted in this draft permit, remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them. Where the source has requested that the Illinois EPA establish new conditions or revise such conditions in a Title I permit, those conditions are consistent with the information provided in the CAAPP application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This draft permit would establish newly revised Title I requirements as addressed in Conditions 7.3.6(a) and 7.7.6(c).

IV. COMPLIANCE INFORMATION

The source has certified compliance with all applicable rules and regulations; therefore, a compliance schedule is not required for this source. In addition, the draft permit requires the source to certify its compliance status on an annual basis.

V. PROPOSED ILLINOIS EPA ACTION / 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 by the Illinois EPA for the draft or proposed permit, pursuant to 35 IAC Part 252 and Sections 39.5(8) and (9) of the Illinois Environmental Protection Act. A final decision on the draft or proposed permit will not be made until the public, affected states, and USEPA have had an opportunity to comment. The Illinois EPA is not required to accept recommendations that are not based on applicable requirements. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.

ATTACHMENT 1: Summary of Source-Wide Requirements

The following table indicates the source-wide emissions control programs and planning requirements that are applicable to this source. These programs are addressed in Sections 5 and 6 of the draft permit.

Program/Plan	Applicable
Emissions Reduction Market System (ERMS)	N/A
Nitrogen Oxides (NO _x) Trading Program	N/A
Acid Rain Program	N/A
Fugitive Particulate Matter (PM) Operating Program	N/A
Risk Management Plan (RMP)	N/A
PM ₁₀ Contingency Measure Plan	N/A

ATTACHMENT 2: Summary of Requirements for Specific Emission Units

The following tables include information on the requirements that apply to significant emission units at this source. The requirements are found in Section 7 of the draft permit, which is further divided into subsection, i.e., Section 7.1, 7.2, etc., for the different categories of units at the source. A separate table is provided for each subsection in Section 7 of the draft permit. An explanation of acronyms and abbreviations is contained in Section 2 of the draft permit.

Table 1 Boilers #5 and #6 (Section 7.1)

Emission Unit	
Name	Utility Boilers
Description	Two natural gas-fired/fuel oil #2 utility boilers supply steam, heat and power for the needs of this source
Date Constructed	Boiler #5: 1966 Boiler #6: 1966
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 200 ppm of CO (35 IAC 216.121) • 30 percent opacity (35 IAC 212.123(a)) • 0.15 kg/MW-hr of PM (35 IAC 212.206) • 0.46 kg/MW-hr of SO₂ (35 IAC 214.161(b)) • 0.46 kg/MW-hr of NO_x (35 IAC 217.141(a))
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • N/A
Other Limits	<ul style="list-style-type: none"> • Each boiler is limited to 5.0/15.0 tons of NO_x (per ozone season and calendar year) in order to avoid applicability of certain requirements/limits of 35 IAC Part 217 Subpart D
Non-applicability	<ul style="list-style-type: none"> • 35 IAC 218.301: fuel combustion emission units are not subject 8 lb VOM/hr. • 40 CFR Part 64: control devices are not utilized • 40 CFR Part 63, Subpart JJJJJJ: natural gas-fired boilers are exempt
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Testing of CO, SO₂, NO_x and PM if fuel oil usage exceeds 48 hours/year of each boiler
Emissions Monitoring	<ul style="list-style-type: none"> • Semi-annual opacity observations (by using Method 22) for each boiler
Operational Monitoring	<ul style="list-style-type: none"> • N/A

Inspections	<ul style="list-style-type: none"> • 40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources - tune-up requirements on the biennial basis; inspections of burners, flame pattern and air-to-fuel ratio
Recordkeeping	<ul style="list-style-type: none"> • Total natural gas usage for and fuel oil #2 usage • Records of monthly and annual emissions • Operating log of tune-ups performed • Sulfur content in the fuel oil #2
Justification of Established Monitoring Activities	
35 IAC 216.121	<ul style="list-style-type: none"> • Regular tune-ups, maintenance activities and annual opacity observations ensure that 200 ppm standard is met. Natural gas is the primary fuel and fuel oil #2 is very rarely (and sporadically) used
35 IAC 212.123(a)	<ul style="list-style-type: none"> • Regular tune-ups, maintenance activities and annual opacity observations ensure that 30 percent opacity standard is met. Natural gas is the primary fuel and fuel oil #2 is very rarely (and sporadically) used
35 IAC 212.206 & 214.161(b)	<ul style="list-style-type: none"> • These standards applicable to burning of fuel oils only. Fuel oil #2 is very rarely (and sporadically) used by these boilers. If it is used, compliance with PM and SO₂ standards are monitored by performing regular tune-ups, inspections and maintenance activities along with the required records of sulfur content in the fuel. Because of infrequent use of fuel oil, biennial tune-ups and maintenance activities will be enough to ensure compliance
35 IAC 217.141(a)	<ul style="list-style-type: none"> • Regular tune-ups and maintenance activities should ensure that NO_x standard is met. Natural gas is the primary fuel and fuel oil #2 is very rarely (and sporadically) used
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • Deviation reports
Other Reporting	<ul style="list-style-type: none"> • Notification of Compliance Status for 40 CFR Part 63, Subpart JJJJJJ is required
Other Information	
Footnotes	N/A

Table 2 Boilers #4 and 3511-FCEU-1 & 2 (Section 7.3)

Emission Unit	
Name	Boilers
Description	Three natural gas-fired/fuel oil #2 boilers supply steam, heat and power for the needs of this source
Date Constructed	Boiler #4: 1952 Boiler #3511-FCEU-1 & 2: N/A
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 200 ppm of CO (35 IAC 216.121) • 30 percent opacity (35 IAC 212.123(a))
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • N/A
Other Limits	<ul style="list-style-type: none"> • N/A
Non-applicability	<ul style="list-style-type: none"> • 35 IAC 218.301: fuel combustion emission units are not subject 8 lb VOM/hr. • 40 CFR Part 64: control devices are not utilized • 40 CFR Part 63, Subpart JJJJJJ: natural gas-fired boilers are exempt
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Testing of CO, SO₂, NO_x and PM if fuel oil usage exceeds 48 hours/year of each boiler
Emissions Monitoring	<ul style="list-style-type: none"> • Semi-annual opacity observations (by using Method 22) for each boiler
Operational Monitoring	<ul style="list-style-type: none"> • N/A
Inspections	<ul style="list-style-type: none"> • 40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources - tune-up requirements on the biennial basis; inspections of burners, flame pattern and air-to-fuel ratio
Recordkeeping	<ul style="list-style-type: none"> • Total natural gas usage for and fuel oil #2 usage • Records of monthly and annual emissions • Operating log of tune-ups performed • Sulfur content in the fuel oil #2
Justification of Established Monitoring Activities	

35 IAC 216.121	<ul style="list-style-type: none"> Regular tune-ups, maintenance activities and annual opacity observations ensure that 200 ppm standard is met. Natural gas is the primary fuel and fuel oil #2 is very rarely (and sporadically) used
35 IAC 212.123(a)	<ul style="list-style-type: none"> Regular tune-ups, maintenance activities and annual opacity observations ensure that 30 percent opacity standard is met. Natural gas is the primary fuel and fuel oil #2 is very rarely (and sporadically) used
35 IAC 212.206 & 214.161(b)	<ul style="list-style-type: none"> These standards applicable to burning of fuel oils only. Fuel oil #2 is very rarely (and sporadically) used by these boilers. If it is used, compliance with PM and SO₂ standards are monitored by performing regular tune-ups, inspections and maintenance activities along with the required records of sulfur content in the fuel. Because of infrequent use of fuel oil, biennial tune-ups and maintenance activities will be enough to ensure compliance
35 IAC 217.141(a)	<ul style="list-style-type: none"> Regular tune-ups and maintenance activities should ensure that NO_x standard is met. Natural gas is the primary fuel and fuel oil #2 is very rarely (and sporadically) used
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> Deviation reports
Other Reporting	<ul style="list-style-type: none"> Notification of Compliance Status for 40 CFR Part 63, Subpart JJJJJJ is required
Other Information	
Footnotes	N/A

Table 3 Miscellaneous Boilers (Section 7.3)

Emission Unit	
Name	Miscellaneous Boilers

Description	Seventeen natural gas-fired/fuel oil #2 boilers supply steam, heat and power for the needs of this source. Firing rates of these small boilers are less than 10.0 mmBtu/hr
Date Constructed	The actual dates of construction are unknown for some boilers. Other had been constructed in 1992, 1993, 1995, 1996, and 2000.
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 30 percent opacity (35 IAC 212.123(a))
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • TIR condition summarizes total monthly and annual emissions from all small affected boilers. Limits have been established for CO, PM, VOM, and NO_x.
Non-applicability	<ul style="list-style-type: none"> • 35 IAC 218.301: fuel combustion emission units are not subject 8 lb VOM/hr. • 40 CFR Part 64: control devices are not utilized • 35 IAC 216.121: less than 10 mmBtu/hr
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Annual opacity observations by using Method 22
Emissions Monitoring	<ul style="list-style-type: none"> • N/A
Operational Monitoring	<ul style="list-style-type: none"> • N/A
Inspections	<ul style="list-style-type: none"> • 40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources - tune-up requirements on the biennial basis; inspections of burners, flame pattern and air-to-fuel ratio
Recordkeeping	<ul style="list-style-type: none"> • Total natural gas usage for and fuel oil #2 usage • Records of total monthly and annual emissions • Operating log of tune-ups performed • Sulfur content in the fuel oil #2 • Opacity observation result for two larger boilers (> 10 mmBtu/hr)
Justification of Established Monitoring Activities	
35 IAC 212.123(a)	<ul style="list-style-type: none"> • Regular tune-ups, maintenance activities and annual opacity observations (for two larger boilers - > 10 mmBtu/hr) ensure that 30 percent opacity standard is met. Natural gas is the primary fuel and fuel oil #2 is very rarely (and sporadically) used. Considering that natural gas is a primary fuel and small heat input of the smaller boilers (< 10 mmBtu/hr) in this category, regular annual opacity tests are not feasible to conduct
Reporting	

Prompt Reporting	<ul style="list-style-type: none">• Deviation reports
Other Reporting	<ul style="list-style-type: none">• N/A
Other Information	
Footnotes	N/A

Table 4 (Section 7.4)

Emission Unit	
Name	Engines and Turbines
Description	Engines and Turbines are used to produce power for facility needs and for training purposes.
Date Constructed	14 engines: 1990 3 turbines: 1983, 2000, 2001
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 2000 ppm of CO (35 IAC 214.301) • 30 percent opacity (35 IAC 212.123(a)) • For turbine GTG2: SO₂ gases in excess of 0.015 percent by volume (40 CFR 60.333(a)); or shall not burn any fuel which contains total sulfur in excess of 0.8 percent by weight (40 CFR 60.333(b))
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • Condition puts the limit on annual hours of operations of turbine GTG2 and corresponding hourly and annual emission limits for CO, PM, VOM, and NO_x • Annual hours of operation limit for each engine
Other Limits	<ul style="list-style-type: none"> • Maximum annual output limit for all engines at the source (mm bhp-hr) for purposes of applicability avoidance of 35 IAC 217.388(a)(1)
Non-applicability (reason)	<ul style="list-style-type: none"> • 35 IAC 218.301: fuel oils are not subject 8 lb VOM/hr. • 40 CFR Part 64: control devices are not utilized • 35 IAC 217.388(a)(1) (state only requirement): affected engines at the source are the low usage units and limited to 8 mm bhp-hr on an annual basis • 35 IAC 217.121: not a fuel combustion emission units • 40 CFR 60.322(a): military training facilities are not subject • 40 CFR 60 Subpart JJJJ: engines are not spark ignition • 40 CFR 60 Subpart IIII: manufactured before 2007 • 40 CFR 63 Subpart YYYY: source is not a major for HAP's
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Annual opacity observations by using Method 9
Emissions Monitoring	<ul style="list-style-type: none"> • N/A

Operational Monitoring	<ul style="list-style-type: none"> • Annual tune-up of each engine/turbine • Monitoring of sulfur content in each oil shipment or maintain certification of ultra low sulfur content (less than 0.05 weight percent) in fuel oil as part of the purchase contract agreement
Inspections	<ul style="list-style-type: none"> • N/A
Recordkeeping	<ul style="list-style-type: none"> • Total natural gas usage for and fuel oil #2 usage • Records of monthly and annual emissions • Operating log of tune-ups performed • Sulfur content in the fuel oil #2
Justification of Established Monitoring Activities	
35 IAC 214.301	<ul style="list-style-type: none"> • Annual tune-ups, monitoring of sulfur content in the fuel oil and the records of sulfur content
35 IAC 212.123(a)	<ul style="list-style-type: none"> • Annual tune-ups and opacity observations will be enough to ensure that 30 percent opacity standard is met
40 CFR 60.333(b)	<ul style="list-style-type: none"> • Annual tune-ups, monitoring of sulfur content in the fuel oil and the records of sulfur content
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • Deviation reports
Other Reporting	<ul style="list-style-type: none"> • None
Other Information	
Footnotes	N/A

Table 5 (Section 7.5)

Emission Unit	
Name	Cogeneration Facility
Description	The cogeneration facility has two turbines and two duct burners controlled by a selective catalytic reduction. In addition, the facility has two backup engine generators.
Date Constructed	2005
Emission Control Equipment	Selective Catalytic Reduction per each turbine/generator
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 2000 ppm of SO₂ (35 IAC 214.301) • 30 percent opacity (35 IAC 212.123(a)) • 200 ppm of CO (35 IAC 216.121, applicable to duct burners only) • 0.5 percent by weight of sulfur in fuel oil (40 CFR 60.43c(d))- for duct burners • 0.8 percent by weight of sulfur in fuel oil (40 CFR 60.333(b)) - for turbines
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • TI conditions on the limits for individual pollutants from all cogeneration activities, combined and fuel oil usage established in the construction permit 02110039
Non-applicability (reason)	<ul style="list-style-type: none"> • 35 IAC 218.301: fuel oil is not an organic material as defined in 35 IAC 211.4250(b) • 35 IAC 216.121: except duct burners, not subject to turbines and engines - not the fuel combustion emission units • 40 CFR 60.322(a): exempt as a military training facility • 40 CFR 63 Subpart ZZZZ and YYYY: not a major source for HAPs • 40 CFR 60 Subpart JJJJ: not the spark ignition engines • 40 CFR 60 Subpart IIII: manufactured before 2007 • 40 CFR Part 72: not selling electricity to the grid • 40 CFR Part 64: each unit does not have pre-control PTE of NO_x >100 tons/yr. All other pollutants are not controlled by a Selective Catalytic Reduction system
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • Annual opacity observations of each unit by using Method 9
Emissions Monitoring	<ul style="list-style-type: none"> • N/A

Operational Monitoring	<ul style="list-style-type: none"> Monitoring of sulfur content in each oil shipment or maintain certification of ultra low sulfur content (less than 0.05 weight percent) in fuel oil as part of the purchase contract agreement Annual tune-ups of each affected unit
Inspections	<ul style="list-style-type: none"> Annual inspections of each selective catalytic reduction
Recordkeeping	<ul style="list-style-type: none"> Total natural gas usage for and fuel oil #2 usage Records of monthly and annual emissions Operating log of tune-ups performed Sulfur content in the fuel oil #2
Justification of Established Monitoring Activities	
35 IAC 214.301	<ul style="list-style-type: none"> Annual tune-ups, monitoring of sulfur content in the fuel oil and the records of sulfur content
35 IAC 212.123(a)	<ul style="list-style-type: none"> Annual tune-ups and opacity observations will be enough to ensure that 30 percent opacity standard is met
35 IAC 216.121	<ul style="list-style-type: none"> Annual tune-ups and opacity observations will be enough to ensure that 200 ppm limit for CO standard is met
40 CFR 60.333(b) & 40 CFR 60.42c(d)	<ul style="list-style-type: none"> Annual tune-ups, monitoring of sulfur content in the fuel oil and the records of sulfur content will be sufficient to demonstrate compliance with a low sulfur content in the fuel oil
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> Deviation reports
Other Reporting	<ul style="list-style-type: none"> None
Other Information	
Footnotes	<ul style="list-style-type: none"> Turbines are subject to 35 IAC 217 Subpart Q. At this time, Subpart Q was not approved by USEPA as part of the SIP and subject to possible substantial rulemaking changes. Therefore, requirements of Subpart Q are addressed as "State-Only Conditions" in Condition 7.4.13

Table 6 (Section 7.6)

Emission Unit	
Name	Petroleum Dry Cleaning Machines (total 6)
Description	Petroleum dry cleaning machines are serviced for the source's needs.
Date Constructed	2006
Emission Control Equipment	In-build carbon cartridge filters and condensers
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 30 percent opacity (35 IAC 212.123(a)) • 8 lb/hour of organic material emissions (35 IAC 218.301) • Operating requirements and good air pollution practices (40 CFR 60 Subpart JJJ and A_
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • TI condition establishes monthly and annual operating limits in terms of difference between solvent consumption and offsite shipment along with monthly/annual limits of VOM emissions associated with dry cleaning
Non-applicability (reason)	<ul style="list-style-type: none"> • 35 IAC 218.607 through 218.610: PTE/MTE are limited below 25 tons/yr of VOM and 100 tons/yr of VOM, respectively • 40 CFR Part 64: each unit does not have pre-control PTE of VOM > 100 tons/yr. All other pollutants are not controlled.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • 40 CFR 60.624: repetition of initial testing of flow rate of recovered solvent
Emissions Monitoring	<ul style="list-style-type: none"> • N/A
Operational Monitoring	<ul style="list-style-type: none"> • N/A
Inspections	<ul style="list-style-type: none"> • N/A
Recordkeeping	<ul style="list-style-type: none"> • Records of initial performance tests • Total solvent usage and shipped to off-site recovery • Monthly and annual VOM emissions
Justification of Established Monitoring Activities	

40 CFR 60.624	<ul style="list-style-type: none"> • Dry cleaning units are state of the art machines with in-build control and enclosed solvent storage/circulation. With a proper maintenance provided in accordance with manufacturer's manual, no additional testing beyond initial one is required
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • Deviation reports
Other Reporting	<ul style="list-style-type: none"> • None
Other Information	
Footnotes	N/A

Table 7 (Section 7.7)

Emission Unit	
Name	Gasoline Storage Tanks and Dispensing Operations
Description	The gasoline storage tanks and associated dispensing operations are used to maintain the source's vehicle fleet
Date Constructed	1974 through 2005
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 218.122(b): submerged loading pipe • 35 IAC 218.583: requirements to a vapor collection system and pressure/vacuum relief valves • 35 IAC 218.585: Reid vapor pressure limits for gasoline • 35 IAC 218.586: requirements for dispensing operations w/gasoline throughput more than 10,000 gallons/month • 40 CFR 63 Subpart CCCCCC: requirements for dispensing operations w/gasoline throughput less and more than 10,000 gallons/month
Streamlining	N/A
Title I Conditions	<ul style="list-style-type: none"> • TI condition establishes monthly and annual limits on gasoline throughput and VOM emissions
Non-applicability (reason)	<ul style="list-style-type: none"> • 35 IAC 218.301: organic material is not in use as defined in 35 IAC 211.4250(b) • 35 IAC 218.583(a)(2) and (a)(3): capacity of certain tanks less than 2000 or 575 gallons • 40 CFR 64: potential pre-control VOM emissions from each tank is less than major source threshold
Periodic Monitoring (other than basic regulatory requirements)	
Testing	<ul style="list-style-type: none"> • 40 CFR 63.11120(a)(1) and (2): regular tests (once in 3 years) of the pressure-vacuum vent valves and static pressure tests on the gasoline storage tanks • 35 IAC 218.583(a)(4): annual test of the pressure of each pressure/vacuum relief valve
Emissions Monitoring	<ul style="list-style-type: none"> • N/A
Operational Monitoring	<ul style="list-style-type: none"> • N/A

Inspections	<ul style="list-style-type: none"> • N/A
Recordkeeping	<ul style="list-style-type: none"> • Copies of registration for gasoline dispensing • Records of reports for gasoline dispensing • Records of tests performed • Certification from a gasoline supplier • Records of monthly and annual VOM emissions • Records of total monthly and annual gasoline throughput
Justification of Established Monitoring Activities	
35 IAC 218.583(a)(4)	<ul style="list-style-type: none"> • Annual testing are sufficient to verify compliance with the stable and predictable gasoline storage and dispensing
35 IAC 218.586	<ul style="list-style-type: none"> • Records of proper maintenance are sufficient to verify compliance with the stable and predictable gasoline storage and dispensing
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • Deviation reports
Other Reporting	<ul style="list-style-type: none"> • Test reports to IEPA conducted in conjunction with volumetric efficiency tests required by 40 CFR 63.11120(b)
Other Information	
Footnotes	N/A

ATTACHMENT 3: Prompt Reporting of Deviations

Prompt reporting of deviations is critical in order to have timely notice of deviations and the opportunity to respond, if necessary. The effectiveness of the permit depends upon, among other important elements, timely and accurate reporting. The Illinois EPA, USEPA and the public rely on timely and accurate reports submitted by the permittee to measure compliance and to direct investigation and follow-up activities. Prompt reporting is evidence of a permittee's good faith in disclosing deviations and describing the steps taken to return to compliance and prevent similar incidents.

Any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in this CAAPP permit is a deviation subject to prompt reporting. Additionally, any failure to comply with any permit term or condition is a deviation of that permit term or condition and must be reported to the Illinois EPA as a permit deviation. The deviation may or may not be a violation of an emission limitation or standard. A permit deviation can exist even though other indicators of compliance suggest that no emissions violation or exceedance has occurred. Reporting permit deviations does not necessarily result in enforcement action. The Illinois EPA has the discretion to take enforcement action for permit deviations that may or may not constitute an emission limitation or standard or the like, as necessary and appropriate.

Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(B), requires prompt reporting of deviations from the permit requirements. The permitting authority (in this case, Illinois EPA) has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur. Furthermore, Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(A) requires that monitoring reports must be submitted at least every 6 months. Therefore, USEPA generally considers anything less than 6 months to be "prompt" as long as the selected time frame is justified appropriately (60 Fed. Reg. 36083, 36086 (July 13, 1995)).

The USEPA has stated that, for purposes of administrative efficiency and clarity, it is acceptable to define prompt in each individual permit. *Id.* The Illinois EPA has elected to follow this approach and defines prompt reporting on a permit by permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, this frequency or a shorter frequency of reporting is the required timeframe used in this permit. Where the underlying applicable requirement fails to explicitly set forth the timeframe for reporting deviations, the Illinois EPA has developed a structured manner to determine the reporting approach used in this permit.

The Illinois EPA generally uses a time frame of 30 days to define prompt reporting of most deviations. Also, for certain permit conditions in individual permits, the Illinois EPA may require an alternate timeframe that is less than 30 days if the permit requirement justifies a shorter reporting time period. Under certain circumstances, EPA may establish a deviation reporting period longer than 30 days, but, in no event exceeding 6 months. Where it has established a deviation reporting period other than 30 days in an individual permit (specifically Section 7.x.10), the Illinois EPA has explained the reason for the alternative timeframe. (See Attachment 2 of this Project Summary.)

The timing for certain deviation reporting may be different when a source or emission unit at a source warrants reporting to address operation, independent of the occurrence of any deviations. This is the case for a source that is required to perform continuous monitoring for the emission unit, for which quarterly or semi-annual "monitoring" reports are appropriate. Where appropriate, reporting of

deviations has generally been combined in, or coordinated with these quarterly or semi-annual reports, so that the overall performance of the plant can be reviewed in a comprehensive fashion. This will allow a more effective and efficient review of the overall performance of the source by the Illinois EPA and other interested parties, as well as by the source itself.

At the same time, there are certain deviations for which quicker reporting is appropriate. These are deviations for which individual attention or concern may be warranted by the Illinois EPA, USEPA, and other interested parties. Under this scenario, emphasis has been placed primarily on deviations that could represent substantial violations of applicable emission standards or lapses in control measures at the source. For these purposes, depending on the deviation, immediate notification may be required and preceded by a follow-up report submitted within 15 days, during which time the source may further assess the deviation and prepare its detailed plan of corrective action.

In determining the timeframe for prompt reporting, the Illinois EPA assesses a variety of criteria such as:

- historical ability to remain in continued compliance,
- level of public interest in a specific pollutant and/or source,
- seriousness of the deviation and potential to cause harm,
- importance of applicable requirement to achieving environmental goals,
- designation of the area (i.e., non-attainment or attainment),
- consistency among industry type and category,
- frequency of required continuous monitoring reports (i.e., quarterly),
- type of monitoring (inspection, emissions, operational, etc.), and
- air pollution control device type and operation

These prompt reporting decisions reflect the Illinois EPA's consideration of the possible nature of deviations by different emission units and the responses that might be required or taken for those different types of deviations. As a consequence, the conditions for different emission units may identify types of deviations which include but are not limited to: 1) Immediate (or very quick) notification; 2) Notification within 30 days as the standard; or 3) Notification with regular quarterly or semi-annual monitoring reports.

The Illinois EPA's decision to use the above stated prompt reporting approach for deviations as it pertains to establishing a shorter timeframe in certain circumstances reflects the criteria discussed as well as USEPA guidance on the topic.

- 40 CFR 71.6(a)(3)(iii)(B) specifies that certain potentially serious deviations must be reported within 24 or 48 hours, but provides for semi-annual reporting of other deviations. (Serious or severe consequences)
- FR Vol. 60, No. 134, July 13, 1995, pg. 36086 states that prompt should generally be defined as requiring reporting within two to ten days of the deviation, but longer time periods may be acceptable for a source with a low level of excess emissions. (intermediate consequences)
- Policy Statement typically referred to as the "Audit Policy" published by the USEPA defines prompt disclosure to be within 21 days of discovery. (Standard for most "pollutant limiting" related conditions)
- Responses to various States by USEPA regarding other States' definition of prompt.

As a result, the Illinois EPA's approach to prompt reporting for deviations as discussed herein is consistent with the requirements of 39.5(7)(f)(ii) of the Act as well as 40 CFR part 70 and the CAA. This reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant individual attention. The timing for these event-specific notifications is necessary and appropriate as it gives the source enough time to conduct a thorough investigation into the causes of an event, collecting any

necessary data, and to develop preventative measures, to reduce the likelihood of similar events, all of which must be addressed in the notification for the deviation.