

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

BP Products North America, Inc.
Attn: Mr. Al Fauley - Terminal Manager
2201 South Elmhurst Road
Des Plaines, Illinois 60018

<u>Application No.:</u> 95060056	<u>I.D. No.:</u> 031804AAT
<u>Applicant's Designation:</u>	<u>Date Received:</u> June 9, 1995
<u>Operation of:</u> Bulk Petroleum Terminal	
<u>Date Issued:</u> May 21, 2002	<u>Expiration Date</u> ² : May 21, 2007
<u>Source Location:</u> 2201 South Elmhurst Road, Des Plaines, Cook County	
<u>Responsible Official:</u> Al Fauley, Terminal Manager	

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

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

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

DES:EEW:jar

cc: Illinois EPA, FOS, Region 1
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

BP Products North America, Inc.
2201 South Elmhurst Road
Des Plaines, Illinois 60018
847/824-5176

I.D. No.: 031804AAT
Standard Industrial Classification: 5171, Refined Petroleum Bulk
Storage and Distribution

1.2 Owner/Parent Company

BP America, Inc.
200 East Randolph Drive
Chicago, Illinois 60601

1.3 Operator

BP Products North America, Inc.
2201 South Elmhurst Road
Des Plaines, Illinois 60018

Mr. Al Fauley, Terminal Manager
847/824-5176

1.4 General Source Description

This BP Products North America, Inc., facility is located at 2201 South Elmhurst, Des Plaines, Illinois. The source is a petroleum bulk terminal for various refined intermediate and finished petroleum products. Materials are transferred to the terminal by pipe line and by truck where they may be temporarily stored at the source prior to shipment of the material to different destinations via pipe line, or distributed to petroleum bulk plants or gasoline dispensing operations located within the surrounding community by way of truck. A truck loading/unloading rack is used to transfer petroleum products from the source to and/or from the trucks. This rack consists of a single large rack for loading trucks and more than one site for unloading trucks.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
API	American Petroleum Institute
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
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic foot
gal	gallon
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
°K	degrees Kelvin
kPa	Kilopascals
kW	Kilowatts
LAER	Lowest Achievable Emission Rate
l	liter
lb	pound
m	meter
m ³	cubic meters
MACT	Maximum Achievable Control Technology
mg	Milligrams
mm	Millimeter
mmBtu	Million British thermal units
mmHg	millimeter mercury
mo	month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
OM	Organic Material
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration

psi	pounds per square inch
psia	pounds per square inch absolute
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
TANKS	USEPA Emission Estimating Program for Storage Tanks
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
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VCU	Vapor Combustion Unit
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
wt.	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Stormwater Collection Tank 62
Stormwater Collection Tank 63
API Separator for Drainage Collection and Holding

- 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:

Fugitive PM Emissions from Vehicular Traffic on Paved and Unpaved Roads

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

- a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].
- b. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].
- c. 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)].
- d. 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	Dates of Construction	Emission Control Equipment
Group 1 Storage Tanks ¹	Existing Internal Floating Roof Storage Tanks	Prior to 1974	Floating Roof With Primary Seal or Primary/Secondary Seal and Permanent Submerged Fill
Group 2 Storage Tanks ¹	New Internal Floating Roof Storage Tanks	After 1992	Floating Roof With Primary Seal or Primary/Secondary Seal and Permanent Submerged Fill
Tank Truck Loading/Unloading Rack	Five Bay Petroleum Product Truck Loading and Unloading Rack	1995	Vapor Combustion Unit
Fugitive Emissions	Piping, Valves, Pumps, and Flanges Used to Transfer Materials Between Pipeline and Storage Tanks	N/A	None

¹ See Attachment 1 for more details.

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM 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 7.0 (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 Vapor Pressure Operating Requirements

Pursuant to 35 IAC 218.585(a), (b), and (c), during the regulatory control periods of May 1 to September 15 of each year, no person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois, gasoline that exceeds the following:

- a. Reid vapor pressure of non-ethanol gasoline shall not exceed 9.0 psi (62.07 kPa); and

- b. Reid vapor pressure of ethanol blend gasoline shall not exceed 10.0 psi (69 kPa). Notwithstanding this limitation, blenders of ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline.

5.2.4 Ozone Depleting Substances

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

5.2.5 Risk Management Plan

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

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.6 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.

5.2.7 Episode Action Plan

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

5.2.8 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

- a. This permit is issued based on the source not being subject to 40 CFR 63, Subparts R, Y, and OOO because the source is not a major source of HAPs (aggregate actual HAP emissions from the source is less than 10 tons of each individual HAP and 25 tons for all HAPs). [40 CFR Section 63.420(a)] (See also Condition 5.5.)
- b. This permit is issued based on the source not being subject to 40 CFR 61, Subpart J because the pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source are not in benzene service as defined in 40 CFR 61.111. (See also Condition 5.4)
- c. This permit is issued based on the source not being subject to 40 CFR 61, Subpart V because pumps, pressure relief devices, compressors, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels at the source are not in volatile hazardous air pollutant service as defined in 40 CFR 61.241. (See also Condition 5.4)
- d. This permit is issued based on the source not being subject to 40 CFR 61, Subpart Y because the storage tanks at the source are not in benzene service nor do they store industrial grade benzene or refined benzene as defined in 40 CFR 61.270(a). (See also Condition 5.4)
- e. This permit is issued based on the source not being subject to 40 CFR 68, because the materials stored at the source are fuels that are in distribution for use as fuel for internal combustion engines.

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:

- a. The pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves,

flanges and other connectors, product accumulator vessels and storage tanks at the source shall not be used to process, store, unload or load any of the following:

- i. A VOL containing vinyl chloride or benzene in excess of 10 percent by weight.

These limits are being established, pursuant to a request by the Permittee, in order to demonstrate the non-applicability of the rules referenced in Condition 5.3. Compliance is automatically demonstrated by the Permittee managing only petroleum products, ethanol, and the additives normally used in the management of petroleum products.

- b. The Permittee shall not exceed the following source wide limits

- i. The MTBE concentration of reformulated and conventional gasoline at the source shall not exceed an annual average concentration of 7.6%. Based upon the analysis provided in the application MTBE in the primary HAP of concern in gasoline.

- ii.

Gasoline Throughput	
<u>(gal/month)</u>	<u>(gal/year)</u>
88,000,000	530,000,000

These limits are being established, pursuant to a request by the Permittee, in order to demonstrate the source is not a major source for HAPs as referenced in Condition 5.5.2. Compliance with these limits shall be assured through the recordkeeping, reporting and compliance procedures shown in Conditions 5.6, 5.7, and 5.9, respectively.

- c. The Permittee shall inspect pumps and compressors for leaks on at least a quarterly basis. If a significant leak is detected by any means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs within 15 days. This requirement provides the basis for determining compliance with 35 IAC 218.142, as noted in section 5.10.

- d. During the regulatory control period, May 1 through September 15 of each year, any operation in Illinois receiving gasoline or ethanol blends from this source

shall be provided documentation stating that the gasoline Reid vapor pressure complies with the Reid vapor pressure requirements of 35 IAC 219.585(b) and (c), as specified in Condition 5.2.3.

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 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)	55.78
Sulfur Dioxide (SO ₂)	---
Particulate Matter (PM)	1.01
Nitrogen Oxides (NO _x)	14.00
HAP, not included in VOM or PM	---
Total	70.79

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Area source status for HAPs is due to the gasoline throughput limitations at the gasoline loading rack and the on-site management of reformulated gasoline and conventional gasoline that does not contain MTBE (defined as having an MTBE concentration of 7.6% or less). The Permittee shall demonstrate that their area source status has not changed based on the following:

- a. Compliance with the throughput limitations contained within this permit shown in Conditions 5.4 and 7.3.5(c) and the recordkeeping, reporting and compliance procedures shown in Conditions 5.6, 5.7, 5.9, and 7.3.9(a), respectively;
- b. Compliance with the operating requirements for the VCU in Condition 7.3.5(b).
- c. Operation of the source such that none of the source parameters used to calculate the maximum terminal

emission screening factor (E_t) in the equation of 40 CFR 63.420(c)(1) is exceeded in any rolling 30-day period.

- d. The availability of data that can demonstrate that the MTBE concentration of the gasoline managed at the terminal was 7.6% or less on an annual average. This data does not need to be maintained at the terminal if the analysis is performed off site. The data shall be produced upon agency request. The Permittee will have 30 days to produce the data after receipt of written Illinois EPA request.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) do not apply to the source.

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 7.0 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 General Records for Storage Tanks

- a. The Permittee shall maintain a record identifying which unit-specific condition (Condition 7.1, or 7.2 of this permit) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.
 - b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity greater than 40 m³ (approximately 10,500 gallons) [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.
 - i. The date* on which construction of the tank was commenced, with a copy of supporting documentation;
 - ii. The date(s)* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, were commenced on the tank, if applicable;
 - iii. A list of the types of VOL actually stored in the tank and anticipated to be stored in the tank, with date of each change in the list; and
 - iv. The dimensions of the tank and an analysis of capacity. [35 IAC 218.129(f) and 40 CFR 60.116b(b)]
- * If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

5.6.2 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the storage tanks at the source so as to demonstrate compliance with the annual emission limits in Condition 5.5. These records shall be updated whenever there is a

change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

- a. The color of each storage tank;
- b. The condition of each storage tank; and
- c. The type and number of fittings, or a statement that the default settings regarding type and number of fittings in the TANKS program or other USEPA accepted protocols and methods (such as AP-42) are used for emission estimation.

5.6.3 Emissions Records

The Permittee shall maintain records of the following items to quantify annual VOM and HAP emissions, so as to demonstrate compliance with the limits in Condition 5.5, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain the following general records:
 - i. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;
 - ii. The vapor weight percent of each HAP in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey, typical concentrations based on analysis or engineering judgment, or maximum expected concentrations;
 - iii. A current analysis of the tank or tanks in each group that would have the greatest working loss emissions from storage of various liquids to the extent that the Permittee does not choose to keep throughput records by individual tank, to identify the tank that should be assumed for emission calculations.
- b. The Permittee shall maintain records of the following items on a monthly basis for the previous month:

- i. The throughput of each organic liquid through each tank or group of tanks and the truck loading rack;
 - ii. Total throughputs on a 12 month running basis for the tank or groups of tanks and truck loading rack, calculated monthly by totaling the throughput for the previous month plus the throughput from the preceding 11 months, with supporting calculations.
- c. Total annual emissions on a calendar year basis for the emission units covered by Section 7.0 Unit Specific Conditions) of this permit.

5.6.4 Records for Operating Scenarios

N/A (See Specific Conditions 7.1.11, 7.2.11, and 7.3.11.)

5.6.5 Records for Pumps and Compressors in Gasoline Service Inspections

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

- a. The performance of an inspection or other observation identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;
- b. The condition, i.e., idle or operation, of each pump inspected;
- c. The presence of a leak, with description and the means of identification;
- d. The date the leak was repaired, or the component taken out of service; and
- e. If a corrective action, as in Condition 5.4(c), was not taken within 15 days, an explanation why corrective action could not be taken within 15 days.

5.6.6 Records for Gasoline Volatility

Pursuant to 35 IAC 218.585(h)(2), and Condition 5.2.3 of this permit, the Permittee shall maintain records of the following items for gasoline and ethanol blends leaving the source for use in Illinois:

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

5.6.7 Retention and Availability of Records

- a. All records 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), 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 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. Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months shall be reported within 30 days of such an occurrence; and
- b. Any exceedance of the MTBE or gasoline throughput limits shown in Condition 5.4.(b).

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. This report shall include both annual VOM emissions and annual HAP emissions for the source.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall report annually to the Administrator that the facility parameters established under screening equation have not been exceeded. This will be accomplished by the submittal of the annual compliance certification under Condition 9.8 [40 CFR 63.428(i)(3)].

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A. However, Conditions 7.1.11, 7.2.11, and 7.3.11 contain specific operational flexibility anticipated operating scenarios.

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 7.0 (Unit Specific Conditions) of this permit.

- a. Available data on the storage temperature may be used to determine the maximum true vapor pressure (See Section 7). [35 IAC 218.128(b)]
- b. For the purpose of estimating VOM emissions from the storage tanks, the current version of the TANKS program is acceptable, as are other methods based on AP-42 or other USEPA approved factors and protocols.
- c. For the purpose of estimating HAP emissions from equipment at the source, the liquid weight percent or the vapor weight percent of each HAP, as appropriate, in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey, typical concentrations based on analysis or engineering judgment, or maximum expected concentrations is acceptable.
- d. Total VOM and HAP emissions at the source shall be determined as the sum of the respective VOM and HAP emissions from the tanks and the truck loading rack (Conditions 7.1 through 7.3).

5.10 Special Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 218.142. Condition 5.4(c) establishes appropriate compliance procedures for this rule which do not rely on such measurements.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits.

These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

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

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

6.2 Applicability

Emissions of VOM from the source during the seasonal allotment period from May 1 through September 30 of each year shall not exceed 15 tons, not including VOM emissions from insignificant

emission units and activities as identified in Section 3 of this permit. This limitation is established at the request of the source to exempt it from the requirements of 35 IAC Part 205, Emissions Reduction Market System (ERMS), pursuant to 35 IAC 205.205.

6.3 Recordkeeping and Reporting

- a. The Permittee shall maintain the following records to determine compliance with the above limitation:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period.
- b. The Permittee shall submit the seasonal emissions component of the Annual Emissions Report by October 31 of each year, reporting actual emissions of VOM during the seasonal allotment period, in accordance with 35 IAC 205.205(b) and 35 IAC 205.300.
- c. In the event that the source's VOM emissions during the seasonal allotment period exceed 15 tons, the source shall no longer be exempt from the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period.

6.4 Federal Enforceability

Section 6.0 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Group 1 Storage Tanks
Existing Internal Floating Roof Storage Tanks

7.1.1 Description

The Permittee operates existing internal floating roof storage tanks to store various petroleum products. (Existing, for the purpose of this section, means constructed prior to June 11, 1973.) Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.1.2 List of Emission and Pollution Control Equipment¹

Group 1 Storage Tank No.	Description	Emission Control Equipment
2	Internal Floating Roof (External Floating Roof with Geodesic Dome)	Permanent Submerged Loading Pipe and Internal Floating Roof
4	Internal Floating Roof (External Floating Roof with Geodesic Dome)	Permanent Submerged Loading Pipe and Internal Floating Roof
6	Internal Floating Roof (External Floating Roof with Geodesic Dome)	Permanent Submerged Loading Pipe and Internal Floating Roof
7	Internal Floating Roof (External Floating Roof with Geodesic Dome)	Permanent Submerged Loading Pipe and Internal Floating Roof
8	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof

¹ See Attachment 1 for more details.

7.1.3 Applicability Provisions

The "affected tanks" for the purpose of these unit-specific conditions, are existing internal floating roof petroleum liquid storage tanks, used for the storage of volatile petroleum liquids (VPL) with a maximum true vapor pressure equal to or greater than 10.34 kPa (1.5 psia) but less than 86.19 kPa (12.5 psia) at 294.3°K (70°F), for which construction, reconstruction, or modification commenced prior to June 11, 1973, and with a storage capacity greater than 151.42 cubic meters (40,000 gallons). These affected tanks are subject to the requirements of 35 IAC 218.121, 218.122(b), and 218.123. The status of all affected storage tanks at this source is

summarized in Attachment 1.

7.1.4 Non-Applicable Regulations

- a. The affected tanks are not subject to the requirements of 35 IAC 218.120, 218.127, 218.128, and 218.129, because the affected tanks are used solely for the storage of petroleum liquids, pursuant to 35 IAC 218.119(e).
- b. This permit is issued based on the affected tanks not being subject to 35 IAC 218.124, because the affected tanks are not equipped with external floating roofs.
- c. This permit is issued based on the affected tanks not being subject to the New Source Performance Standards (NSPS) for petroleum liquids, 40 CFR Part 60, Subpart K, Ka, or Kb, because the affected tanks were constructed prior to June 11, 1973 and have not been modified since that date.
- d. This permit is issued based on the affected tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks use a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.1.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. A floating roof which rests on the surface of the VOL that is equipped with a primary seal [35 IAC 218.121(b)(1)];
- b. All openings of the floating roof deck, other than drains, shall be equipped with covers, lids or seals [35 IAC 218.123(b)(3)]; and
- c. A permanent submerged loading pipe. [35 IAC 218.122(b)]

7.1.6 Emission Limitations

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

N/A

7.1.7 Operating Requirements

- a. Each affected tank shall be operated so that the floating roof including the seal closure devices meet each of the following requirements:
 - i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)];
 - ii. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:
 - A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 218.123(b)(3)(A)];
 - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 218.123(b)(3)(B)]; and
 - C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting [35 IAC 218.123(b)(3)(C)].
- b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 218.121 (b)(1)].

7.1.8 Inspection Requirements

- a. The Permittee shall inspect the floating roof seals through the roof hatches of each affected tank once every six months to insure compliance with the applicable control and operating requirements [35 IAC 218.123(b)(4)].
- b. The Permittee shall perform a complete inspection (internal and external) of the cover and seals of each affected tank whenever the tank is emptied for reason(s) other than the transfer of petroleum liquid during the normal operation of the tank, or whenever

repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b)(5)].

Note: Normal operation of the tank includes all operations for which the tank is designed and permitted including periods when empty and not opened and degassed for access, i.e., awaiting service.

7.1.9 Recordkeeping Requirements

a. The Permittee shall maintain records for each affected tank of the results of each inspection or measurement required by Condition 7.1.8(a) and/or (b), pursuant to 35 IAC 218.123(b)(6). Records should include details such as:

i. The affected tank identification;

- ii. When the inspection and/or measurement was performed;
 - iii. Who performed the inspection and/or measurement;
 - iv. The method of inspection and/or measurement;
 - v. The observed condition of each feature of the internal floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement.
- b. The Permittee shall maintain records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of petroleum liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect to demonstrate compliance with Condition 7.1.8(b) (Cover and Seal Inspection) [35 IAC 218.123(b)(5)]:
 - c. The Permittee shall maintain records that are sufficient to identify whenever an affected tank stored materials with a vapor pressure of less than 1.5 psia at 70°F as provided for in Condition 7.1.11.

7.1.10 Reporting Requirements

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

- a. Report any storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.1.5, e.g., "no permanent submerged loading pipe," within 5 days of becoming aware of the deviation. This notification shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps taken to avoid future deviation.
- b. Report any storage of VPL in an affected tank that is not in compliance with the control requirements (Condition 7.1.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the deviation. This notification

shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps taken to avoid future deviation.

7.1.11 Operational Flexibility/ Anticipated Operating Scenarios

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

- a. The Permittee is authorized to store materials with a vapor pressure less than 1.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any affected storage tank identified in this permit as a VPL storage tank. In such instances, the unit specific conditions in Section 7.1 of this permit, applicable to such tank based on the storage of VPL, shall no longer apply. [35 IAC 218.121]
- b. If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure of less than 1.5 psia at 70°F, the Permittee shall maintain a record identifying the specific tank, the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.
- c. Upon resuming storage of VPL in the affected tank, the applicable unit specific conditions of Section 7.1 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct appropriate inspection of the tank for storage of VPL. [35 IAC 218.123]

7.1.12 Compliance Procedures

Emissions from an affected tank shall be determined through the use of an approved USEPA methodology, such as the TANKS program, AP-42, or other approved protocols, factors, and methods.

7.2 Unit: Group 2 Storage Tanks
 New Internal Floating Roof Storage Tanks

7.2.1 Description

The Permittee operates new internal floating roof storage tanks to store various petroleum products. (New, for the purposes of this section, means constructed after July 23, 1984.) Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Emission and Pollution Control Equipment¹

Group 2 Storage Tank No.	Description	Emission Control Equipment
12	New Internal Floating Roof Tank	Permanent submerged Loading Pipe and Internal Floating Roof
16	New Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof

¹ See Attachment 1 for more details.

7.2.3 Applicability Provisions

- a. The "affected tanks" for the purpose of these unit-specific conditions, are internal floating roof petroleum liquid storage tanks, used for the storage of volatile organic liquids, including petroleum liquids with a maximum true vapor pressure equal to or greater than 3.5 kPa (0.5 psia) but less than 76.6 kPa (11.1 psia), with a design storage capacity greater than 151 m³ (40,000 gallons), for which construction, reconstruction, or modification commenced after July 23, 1984, that are subject to the control requirements of 40 CFR Part 60, Subpart Kb, and that rely on an internal floating roof for compliance. The status of all affected storage tanks at this source is summarized in Attachment 1.
- b. All affected tanks in this section are subject to 40 CFR Part 60, Subpart Kb, and are hereby shielded from compliance with 35 IAC 218.119, 218.120, 218.121, 218.127, 218.128, and 218.129. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that

compliance with 40 CFR Part 60, Subpart Kb, assures compliance with 35 IAC 218.119, 218.120, 218.121, 218.127, 218.128, and 218.129.

7.2.4 Non-Applicable Regulations

- a. This permit is issued based on the affected tanks not being subject to 35 IAC 218.123(b), because the affected tanks are subject to new source performance standards for storage vessels of petroleum liquid, 40 CFR Part 60, Subpart Kb, pursuant to 35 IAC 218.123(a)(5).
- b. This permit is issued based on the affected tanks not being subject to 35 IAC 218.124, because the affected tanks are not equipped with external floating roofs.
- c. This permit is issued based on the affected tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks use a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.2.5 Control Requirements

- a. Each affected tank shall comply with the requirements of 40 CFR 60.112b(a)(1)(i), which requires the use of a fixed roof in combination with an internal floating roof that is equipped with one of the following closure devices:
 - i. A foam-filled or liquid-filled liquid-mounted seal; or
 - ii. Two continuous seals; or
 - iii. A mechanical shoe seal.

Note: Changes between one type of seal arrangement or another as a result of repairs or maintenance activities are allowed without a permit modification.

- b. Each affected tank shall also be equipped with a permanent submerged loading pipe, pursuant to 35 IAC 218.122(b).

7.2.6 Emission Limitations

- a. VOM emissions from storage tank 12 shall not exceed 1.15 tons/year. This level of emissions corresponds to a throughput limitation for this tank of 1,900,000 gallons per year of interface. This limitation was established in Permit 73040543, pursuant to 35 IAC

Part 203. This limit ensures 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 35 IAC Part 203 [T1].

- b. VOM emissions from storage tank 16 shall not exceed 1.0 tons/year. This level of emissions corresponds to a throughput limitation for this tank of 60,480,000 gallons per year of ethanol. This limitation was established in Permit 73040543, pursuant to 35 IAC Part 203. This limit ensures 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 35 IAC Part 203 [T1].
- c. 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]

7.2.7 Operating Requirements

Each affected tank shall be operated in compliance with the operating requirements of 40 CFR 60.112b(a)(1) and 60.113b(a), as follows:

- a. The internal floating roof shall float on the liquid surface at all times, except during those intervals when the storage tank is being completely emptied and subsequently refilled and the roof rests on its leg supports. When the roof is resting on its leg supports, the process of emptying or refilling shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112b(a)(1)(i)]
- b. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii)]
- c. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover or lid which is maintained in a closed position at all times (i.e., no visible gaps) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a)(1)(iv)]
- d. Automatic bleeder vents shall be equipped with a gasket and be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a)(1)(v)]

- e. Rim space vents shall be equipped with a gasket and be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a)(1)(vi)]

- f. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a)(1)(vii)]
- g. Each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a)(1)(viii)]
- h. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)]
- i. A tank that is in-service shall be repaired or emptied upon identification in an inspection that the floating roof is not resting on the surface of the VOL, there is liquid accumulated on the roof, the seal is detached, or there are holes or tears in the seal fabric. These actions shall be completed within 45 days of the inspection unless an extension is granted. [40 CFR 60.113b(a)(2) and (a)(3)(ii)]
- j. A tank that is empty shall be repaired prior to refilling the tank upon identification in an inspection that the floating roof has defects, the primary seal has holes, tears or other openings in the seal or seal fabric, or the secondary seal has holes, tears or other openings in the seal or seal fabric, or the gaskets no longer close off. [40 CFR 60.113b(a)(3)(ii) and (a)(4)]

7.2.8 Inspection Requirements

The Permittee shall fulfill the applicable testing and procedures requirements of 40 CFR 60.113b(a) for each affected tank equipped with an internal floating roof as follows:

- a. Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months (Annual Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., the internal floating roof is not resting on the surface of the VOL inside the storage tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric) that the Permittee must

repair or otherwise remove the storage tank from service. [40 CFR 60.113b(a)(2) and (a)(3)(ii)]

- b. Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes (if any), and sleeve seals (if any) each time the storage tank is emptied and degassed (Out-of-Service Inspection) to detect if the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area. If any of these conditions are detected during inspections, the Permittee shall repair the items prior to refilling the storage tank with petroleum liquid. These inspections shall be performed at least every 10 years [40 CFR 60.113b(a)(4)]. Prior notification for Out-of-Service Inspection(s) shall be given to the Illinois EPA as specified in Condition 7.2.10(a).

7.2.9 Recordkeeping Requirements

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

- a. Keep a record of each Annual and Out-of-Service Inspection performed as required by Condition 7.2.8(a) and (b). [40 CFR 60.115b(a)(2)].

Each record shall contain:

- i. The affected tank identification and date the inspection was performed;
 - ii. Who performed the inspection;
 - iii. The method of inspection;
 - iv. The observed condition of each feature of the internal floating roof (seals, roof decks and fittings), with the raw data recorded during the inspection.
- b. The Permittee shall maintain Out-of-Service Inspection records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or

incident of roof damage or defect to demonstrate compliance with Condition 7.2.8(b).

Note: Normal operation of the tank includes all operations for which the tank is designed and permitted including periods when empty and not opened and degassed for access, i.e., awaiting service.

- c. The Permittee shall keep the operating records for each affected tank, as follows:

Records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]

- d. The Permittee shall maintain the following monthly records for the affected storage tanks in accordance with the procedures outlined in Condition 5.6.3, so as to demonstrate compliance with the emission limitations of Condition 7.2.6.
 - i. The identification and properties of each petroleum liquid stored in the storage tank, as related to emissions, i.e., vapor pressure and molecular weight.
 - ii. The throughput of each VOL through the affected tank on a monthly basis.
 - iii. The VOM emissions attributable to each organic liquid stored in the affected tanks, tons/month and tons/year (running 12 months total), with supporting calculations, calculated using an approved USEPA methodology, such as the TANKS program.

7.2.10 Reporting Requirements

- a. The Permittee shall submit written notifications and reports to the Illinois EPA, Compliance Section as required by the NSPS, for each affected tank, as follows:
 - i. A report identifying any deficiencies or shortcomings identified in the Annual Inspection required by Condition 7.2.8(a) within 30 days of inspection. This report shall include the information specified in 40 CFR 60.115b(a)(3).
 - ii. Notification at least 30 days prior to refilling an affected tank for which an Out-of-Service inspection is required by Condition 7.2.8(b) to afford the Illinois EPA

with the opportunity to have an observer present. [40 CFR 60.113b(a)(5)]

If the inspection is not planned and the owner or operator of the tank could not have known about refilling the tank 30 days in advance, a shorter notification may be accepted as provided for in 40 CFR 60.113b(a)(5).

- iii. A report identifying any deficiencies or shortcomings identified in the Out-of-Service Inspection within 30 days of the inspection required by Condition 7.2.8(b). This report shall include the information specified in 40 CFR 60.115b(a)(4).
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations from the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:
- i. Report any storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.2.5, e.g., no "secondary seal," within five days of becoming aware of the deviation. This notification shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps taken to avoid future deviation.
 - ii. Report any storage of VOL in an affected tank that is not in compliance with the control requirements of Condition 7.2.5 due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the deviation. This notification shall include a description of the event, the cause for the deviation, actions taken to correct the deviation, and the steps taken to avoid future deviation.
- c. Reporting of Exceedance

The Permittee shall notify the Illinois EPA, Compliance Section within 30 days of operation following a record identifying VOM emissions from any affected tank in excess of the limitation of Condition 7.2.6(a) or 7.2.6(b) pursuant to Section 39.5(7)(g) of the Act.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Changes in the material stored with a vapor pressure less than 0.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any affected storage tank identified in this permit as a VOL storage tank. In such instances, the unit specific conditions in Section 7.2 of this permit, applicable to such tank based on the storage of VOL, shall no longer apply.
- b. If any storage tank identified in this permit as storing VOL changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F, the Permittee shall maintain a record identifying the specific tank, the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VOL.
- c. Upon resuming storage of VOL with a maximum true vapor pressure equal to or greater than 3.5 kPa (0.5 psia) but less than 76.6 kPa (11.1 psia), the applicable unit specific conditions of Section 7.2 of this permit shall again apply. In addition, prior to returning such a tank to storage of VOL, the Permittee shall conduct appropriate inspection(s) of the tank. [40 CFR 60.113b(a)(4)]

7.2.12 Compliance Procedures

Compliance with emission limits and emission record-keeping requirements shall be demonstrated by keeping records of the material stored in the affected tanks and tank throughputs to validate that the tanks are not used to store VOL with a vapor pressure greater than or throughputs greater than those specified in Conditions 7.2.3 and 7.2.6.

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

the TANKS program, AP-42 or other approved protocols,
factors, and methods.

7.3 Unit: Truck Loading/Unloading Rack
Control: Vapor Combustion Unit

7.3.1 Description

The truck loading/unloading rack is used to load and unload various petroleum products. The Permittee operates a loading rack that consists of five bays with a total of twenty loading points which can be used in any combination without affecting total loading rack emissions. The VOM emissions from the truck loading/unloading rack occur when material (e.g., gasoline and distillate petroleum products) is loaded into delivery vehicles. A vapor combustion unit (VCU) is used to capture and control the emissions that occur as a result of displacement of vapors in the delivery vehicles.

The VOM emissions from unloading material (e.g., petroleum products, additives and ethanol) are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions which are attributed to the truck loading station components, (i.e., valves, flanges, etc). Unloading of trucks into storage tanks is therefore not specifically regulated under this permit. Unloading of trucks into storage tanks may occur at more than one unloading station/rack at the terminal.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date of Construction
Loading/Unloading Rack	Five Bay Loading Rack Used for Loading Various Petroleum Products Into Tank Trucks	Vapor Combustion Unit	September, 1995

7.3.3 Applicability Provisions

- a. An "affected loading rack," for the purpose of these unit-specific conditions, is a loading rack that is subject to the requirements of 40 CFR 60 Subpart XX and 35 IAC 218.582 and relies on a vapor collection/combustion unit for compliance. For purposes of 40 CFR 60 Subpart XX, a "gasoline tank truck" is a delivery tank truck used at bulk gasoline terminals which is loading gasoline or has loaded gasoline on the immediately previous load. Each loading rack used to transfer gasoline into a delivery vessel (gasoline tank truck) from any bulk gasoline

terminal is subject to the requirements of 35 IAC 218.582 and 218.585. Loading racks constructed or modified after December 17, 1980 are subject to the requirements of 40 CFR 60 Subpart XX. (All affected loading racks in this section are hereby shielded from compliance with 35 IAC 218.122.)

- b. There are also source wide limitations in Condition 5.2.2 that include this unit.
- 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, pursuant to 35 IAC 214.301.

7.3.4 Non-Applicability of Regulations of Concern

The affected truck loading/unloading rack is not subject to 35 IAC Part 218, Subpart TT, because it is subject to 35 IAC 218, Subpart Y. [35 IAC 218.980 (a) and (b)]

7.3.5 Control Requirements and Operational Limitations

- a. Each affected loading rack shall be equipped and operated with a vapor collection system designed to collect the total organic compounds (TOC) vapors displaced from tank trucks during product loading that limits the emissions to the atmosphere to not more than 35 milligrams of TOC per liter of gasoline loaded pursuant to 40 CFR 60.502(a), and (b) and 35 IAC 218.582(a)(2).
- b. The total organic compound emissions from the affected loading rack and associated vapor combustion unit shall not exceed 10 milligrams per liter of gasoline loaded, pursuant to Sections 9.1(d) and 39 of the Act, so that the construction and subsequent operation of this loading rack and vapor collection/combustion unit, as previously addressed in permit 73040543 is not a major modification subject to NSR. This requirement supercedes Condition 7.3.5(a) because it is more stringent. [See also Conditions 7.3.5(c) and 7.3.6(a)].
- c. Loadout of gasoline through the affected loading rack shall not exceed 88,000,000 gal/mo and 530,000,000 gal/yr pursuant to Sections 9.1(d) and 39 of the Act, so that the construction and subsequent operation of this loading rack and vapor collection/combustion unit, as previously addressed in permit 73040543 is not a major modification subject to NSR. [See also Conditions 7.3.5(b) and 7.3.6(a)]

7.3.6 Emission Limitations

- a. VOM emissions from the affected loading rack and associated vapor combustion unit attributable to the loading of petroleum products shall not exceed 3.7 tons/month and 22.1 tons/year. The above limitations were established in Permit 73040543, pursuant to 35 IAC Part 203. 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 35 IAC Part 203 [T1]. [See also Condition 7.3.5(b) and (c)]

Compliance with annual VOM 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 months total) and by use of the formula provided in Condition 7.3.12(c).

- b. Nitrogen oxides (NO_x) emissions from the vapor combustion unit associated with the affected loading rack shall not exceed 5 mg/l (0.000042 lb/gal), 1.4 tons/month, and 14.0 tons/year. The above limitations were established in Permit 73040543, pursuant to 35 IAC Part 203. 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 35 IAC Part 203. [T1]

Compliance with annual NO_x 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) and by the use of the formula provided in Condition 7.3.12(d).

- c. There are also source wide emission limitations in Condition 5.5 that include this unit.

7.3.7 Operating Requirements

- a. Vapor collection systems used to control TOC emissions from affected loading racks shall be designed and operated to prevent any TOC vapors collected at one affected loading rack from passing to another affected loading rack. [40 CFR 60.502(d)]
- b. The Permittee shall act to assure that loadings of gasoline tank trucks are made only into tanks equipped

with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]

- c. The Permittee shall act to assure that each affected loading rack and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. [40 CFR 60.502(g)]
- d. There shall be no liquid drainage from the loading device of an affected loading rack when it is not in use. [35 IAC 218.582(a)(3)]
- e. An affected loading rack and associated vapor collection system shall be designed and operated to prevent gauge pressure in the gasoline tank truck from exceeding 4,500 pascals (450 mm of water) during product loading. [40 CFR 60.502(h)]
- f. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with an affected loading rack. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection. [35 IAC 218.582(b)(2), 218.582(b)(1)(A) and (C)]
- g. No pressure-vacuum vent in an affected loading rack's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [40 CFR 60.502(i)]
- h. All loading and vapor return lines shall be equipped with fittings which are vapor tight. [35 IAC 218.582(a)(4)]
- i. The current VCU is programmed to light when loading rack operation is initiated. Except as allowed under Condition 7.3.11, an affected loading rack must be shut down and not allow loading if the VCU combustion flame does not initiate or is not maintained during loading.
- j. All loading of liquid product into gasoline tank trucks at an affected loading rack shall be limited to vapor-tight tanks using the following procedures in accordance with 40 CFR 60.502:

- i. The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck. [40 CFR 60.502(e)(1)]
 - ii. The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded. [40 CFR 60.502(e)(2)]
 - iii. The Permittee shall cross-check each tank identification number obtained above with the file of tank vapor tightness documentation within two weeks after the tank is loaded. [40 CFR 60.502(e)(3)]
 - iv. The Permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the terminal within three weeks after the loading has occurred. [40 CFR 60.502(e)(4)]
 - v. The Permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the terminal until vapor tightness documentation for that tank truck is obtained. [40 CFR 60.502(e)(5)]
- k. No person shall cause or allow the transfer of gasoline into a delivery vessel from an affected loading rack unless the delivery vessel displays the appropriate sticker pursuant to 35 IAC 218.584(b) or (d) or the delivery vessel has provided a current certification as required by 35 IAC 218.584(c)(3), and the delivery vessel meets the following requirements [35 IAC 218.582(a)(5) and 218.584(a)]:
- i. Includes a vapor space connection that is equipped with fitting(s) which are vapor tight;
 - ii. Has its hatches closed at all times during loading or unloading operations, unless a top loading vapor recovery system is used;
 - iii. Does not internally exceed a gauge pressure of 18 inches of water or a vacuum of 6 inches of water;
 - iv. Is designed and maintained to be vapor tight

at all times during normal operations;

- v. Is not refilled in Illinois at other than:
 - A. Bulk gasoline terminals that comply with the requirements of 35 IAC 218.582; or
 - B. Bulk gasoline plants that comply with the requirements of 35 IAC 218.581(b).
- vi. Are tested annually in accordance with Method 27, 40 CFR 60, Appendix A. Each vessel must be repaired and retested within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, when it fails to sustain:
 - A. A pressure drop of no more than three inches of water in five minutes; and
 - B. A vacuum drop of no more than three inches of water in five minutes.

7.3.8 Inspection and Monitoring Requirements

- a. Each calendar month, the vapor collection/combustion system and each affected loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for TOC liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [40 CFR 60.502(j)]
- b. The VCU combustion flame shall be monitored using a thermocouple or equivalent device to detect the presence of a flame. As per Condition 7.3.7(i), an affected loading rack must be shut down and not allow loading if a flame is not detected in the associated vapor collection/combustion system, except as allowed under Condition 7.3.11.
- c. The vapor collection/combustion system of an affected loading rack shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the vapor control combustion collection system temperature.

7.3.9 Recordkeeping Requirements

a. General Recordkeeping

The Permittee shall maintain records of the following for each affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.3.5(b) and (c), and 7.3.6(a) and (b):

- i. The identification and properties of each organic liquid distributed through each affected loading rack, as related to emissions, i.e., vapor pressure and molecular weight;
- ii. The amount of each organic liquid distributed through each affected loading rack, gal/mo and gal/yr, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months (running 12 month total). Gasoline throughput at the loading rack shall be tracked on a daily basis for use in a rolling 30 day demonstration when requested to demonstrate compliance with the screening equation parameter of gasoline throughput at the loading rack.
- iii. The VOM emissions attributable to the loading of petroleum products through the affected loading rack, tons/month and tons/year (running 12 month total), with supporting calculations in accordance with the compliance procedure in Condition 7.3.12(c).
- iv. The NO_x emissions attributable to the loading of petroleum products through the affected loading rack with its associated VCU, tons/month and tons/year (running 12 month total), with supporting calculations in accordance with the compliance procedures in Condition 7.3.12(d).

b. Records of Operations

The Permittee shall maintain records of the following for the affected loading rack and associated vapor combustion unit to demonstrate compliance with Conditions 7.3.5 and 7.3.7:

- i. The use of an affected loading rack for loading of any gasoline tank truck when there was no flame present in the associated VCU, except as authorized under Condition 7.3.11, including:
 - A. The date and time of the loading;
 - B. The specific problem with the VCU or flame monitor;
 - C. Type of material loaded; and
 - D. The reason loading occurred even though the VCU did not have a flame.

- ii. The use of an affected loading rack for the loading of any non-vapor-tight gasoline tank (one not meeting the requirements of Condition 7.3.7(j)) or a delivery vessel that does not display the appropriate sticker or has not provided a current certification (one not meeting the requirements of Condition 7.3.7(k)), including:
 - A. The date and time of the loading;
 - B. The specific reason the vessel did not meet the requirements of Condition 7.3.7(j) or (k);
 - C. Type of material loaded; and
 - D. The reason why loading was allowed.

c. Records of Inspection

The Permittee shall keep the following records for each affected loading rack and associated vapor collection/combustion system which delivers liquid product into gasoline tank trucks:

A record of each monthly leak inspection required under 40 CFR 60.502(j) (Condition 7.3.8(a)) shall be

kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

- i. Date of inspection;

- ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak);
 - iii. Leak determination method;
 - iv. Corrective action, when taken, including the date each leak was repaired and the reasons for any repair interval in excess of 15 days; and
 - v. Name and signature of the person that performed the inspection.
- d. Gasoline Tank Truck Records

The Permittee shall keep the following records for the gasoline tank trucks loaded at this terminal:

- i. The tank truck vapor tightness documentation required under 40 CFR 60.502(e)(1) (Condition 7.3.7(j)(i));
- ii. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include as a minimum, the following information:
 - A. Test title: Gasoline Delivery Tank Pressure Test - EPA Reference Method 27;
 - B. Owner name and address;
 - C. Tank identification number;
 - D. Testing location;
 - E. Date of test;
 - F. Tester name and signature;
 - G. Witnessing inspector, if any: name, signature, and affiliation; and
 - H. Test results: Actual pressure change in 5 minutes, mm of water (average 2 runs).
- iii. The Permittee shall keep documentation of all notifications required under 40 CFR 60.502(e)(4) (Condition 7.3.7(j)(iv)) on file at the terminal.

7.3.10 Reporting Requirements

a. Semi-Annual Reports

Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit a semi-annual report for any monitoring that is required to demonstrate compliance with Conditions 7.3.8 (a), (b), and (c). These reports shall be submitted by the first of September and March of each year and shall include the following information for the preceding 6 month period as defined in Condition 8.6:

- i. Summary of any use of an affected loading rack, except as provided in Condition 7.3.11, when there was no flame present or detected in the associated VCU, including:
 - A. Date and time of occurrence;
 - B. Findings, if any, (may be no problem found or describe specific problem(s) associated with the VCU or flame monitoring equipment);
 - C. Type and quantity of material being loaded; and
 - D. Reason why loading continued. Include any supporting data (i.e., strip chart or disk).
- ii. Summary of times when the continuous temperature indicator and/or strip chart recorder of disk storage was not functioning, including:
 - A. Date and time of occurrence; and
 - B. Specific problem associated with the indicator or recording equipment.

b. Reporting of Malfunction or Breakdown

The Permittee shall promptly notify the Illinois EPA, Maywood Region Office on the same or next working day of any malfunction or breakdown of any VCU, documenting the time of occurrence and type of malfunction or breakdown. The Permittee shall also submit a quarterly report summarizing the quantity of

emissions, the type and duration of each malfunction and the steps taken to reduce the occurrence of each malfunction or breakdown.

c. Reporting of Noncompliance

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limits as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Notification within 15 days of operation of the affected loading rack and/or associated vapor combustion unit in excess of the limitations of Condition 7.3.6(a), (b) or 7.3.5(b).

d. The Permittee shall notify the Illinois EPA of any use of an affected loading rack to load delivery vessels (gasoline tank trucks) that did not meet the requirements of Conditions 7.3.7(j) or (k), within 30 days of occurrence. Notification shall include:

- i. The date and time of the loading;
- ii. The tank truck identification number and the specific reason the vessel did not meet the requirements of Condition 7.3.7(j) or (k);
- iii. Type and quantity of material loaded; and
- iv. The reason why loading was allowed.

e. Reporting of Exceedance

The Permittee shall promptly notify the Illinois EPA, Compliance Section of any exceedance of loading rack gasoline throughput limits as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Notification within 30 days of operation of the affected loading rack in excess of the throughput limitations of Condition 7.3.5(c).

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change(s) with respect to an affected loading rack without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity

constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. The Permittee may at any time load distillate fuels into tanker trucks that previously carried distillate without the use of the vapor collection system and VCU.
- b. The Permittee may use the documentation prepared pursuant to the annual tank truck certification testing required under 40 CFR 63 Subpart R. Based upon a review of the requirements under 40 CFR 63 Subpart R, i.e., the annual certification testing (40 CFR 63.425(e)) and recordkeeping requirements (40 CFR 63.428(b)(3)f), has been deemed as stringent as that required under 35 IAC 218.584(d) and 40 CFR 60.502(e).
- c. In response to failure or planned maintenance of the existing VCU, The Permittee may use a portable VCU for periods of up to 15 days to allow for the continued loading of gasoline, provided that the portable VCU has been guaranteed by the supplier to be equivalent in its destruction efficiency for VOM and have a monitoring system for determining the presence of a flame during gasoline loading. All requirements in Condition 7.3 will apply to the replacement portable VCU. Extensions beyond 15 days may be granted upon request from and approval by the Illinois EPA.

7.3.12 Compliance Procedures

- a. Compliance with the operational limitations of Condition 7.3.5(c), emission limitations of Condition 7.3.6(a) and (b) and the operating requirements of Condition 7.3.7 shall be demonstrated through the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.3.8, 7.3.9, and 7.3.10.
- b. Compliance with the control requirements of 7.3.5(a) and (b) shall be demonstrated by the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.3.8, 7.3.9, and 7.3.10 and the fact that compliance of the affected loading rack and associated VCU have previously been demonstrated by fulfillment of the test requirements of 40 CFR 60.8 by measurement of the total organic concentration(s) in the effluent stream of the vapor combustion system pursuant to 40 CFR 60.503.
- c. Compliance with the VOM source wide emissions limits in Conditions 5.5 and 7.3.6(a) and the ERMS emissions

limits in Condition 6, VOM emissions from the loading rack shall be determined by use of the following equation:

$$\text{Total Emissions (lbs)} = \sum_{i=1} \text{EF}_i \times \text{V}_i$$

Where:

EF_i = The emission factor for VOM.

V_i = Volume of gasoline or distillate as recorded in the records required by Condition 7.4.9.

For the purpose of estimating gasoline loading VOM emissions from the VCU, the emission factors are the emission rate determined from the VCU's most recent stack test at the time of permit issue, operating factors provided by the manufacturer, or other factors based on good engineering judgment.

For the purpose of estimating distillate loading VOM emissions at the source, the emission factors calculated or found in Section 5.2 of AP-42, published by USEPA or the best available emission factors, including factors developed by the source, are acceptable.

- d. Compliance with the NO_x emission limitations of Conditions 5.5.1 and 7.3.6(b) shall be demonstrated by the summation of the gasoline throughput required by Condition 7.3.9(a). Emissions shall be calculated using the throughput of the loading rack times the VCU manufacturer's guaranteed NO_x emission rate (5 mg/l of gasoline loaded).

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after February 25, 2002 (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 8.6.3.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

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

which are intended to be made, including sampling and monitoring locations;

- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section (MC 40)

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

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

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

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].

10.1 Attachment 1 - Summary of Storage Tank Features and Groupings

TABLE 1-1

Group/Tank No.	Working Capacity (Gallons)	Tank Type	Primary Seal ¹	Secondary Seal	Material Stored	Maximum True Vapor Pressure (psia at 70°F)	Date Constructed
Group 1							
2	3,234,000	Internal Floating Roof	Metallic Shoe	Shoe Mounted	Various Petroleum Products	12.5	1959
4	4,536,000	Internal Floating Roof	Metallic Shoe	Shoe Mounted	Various Petroleum Products	12.5	1959
6	2,972,970	Internal Floating Roof	Metallic Shoe	Shoe Mounted	Various Petroleum Products	12.5	1959
7	2,048,444	Internal Floating Roof	Metallic Shoe	Shoe Mounted	Various Petroleum Products	12.5	1959
8	4,437,000	Internal Floating Roof	Vapor Mounted	Rim Mounted	Various Petroleum Products	12.5	1970
Group 2							
12	352,800	Internal Floating Roof	Vapor Mounted	Rim Mounted	Various Petroleum Products	11.1	1993
16	1,596,210	Internal Floating Roof	Metallic Shoe	Rim Mounted	Various Petroleum Products	11.1	1994

¹ Use of equivalent emission control equipment is allowed without permit modification.

10.2 Attachment 2 - Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____



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

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



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

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

Summary Of Application Contents

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

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

Signature Block

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

	TYPED OR PRINTED NAME OF SIGNATORY
	_____ / _____ / _____
	TITLE 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 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.

10.5 Attachment 5 - Guidance on Renewing This Permit

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

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

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

200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

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

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

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

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

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

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