

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	10
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
5.10 Special Permit Shield	
6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)	21
6.1 Description of ERMS	
6.2 Applicability	
6.3 Obligation to Hold Allotment Trading Units (ATUs)	
6.4 Market Transactions	
6.5 Emissions Excursion Compensation	
6.6 Quantification of Seasonal VOM Emissions	
6.7 Annual Account Reporting	
6.8 Allotment of ATUs to the Source	
6.9 Recordkeeping for ERMS	
6.10 Federal Enforceability	
6.11 Exclusions from Further Reductions	

	<u>PAGE</u>
7.0 UNIT SPECIFIC CONDITIONS	28
7.1 Unit: Group 1 Storage Tanks Fixed roof storage tanks with a capacity greater than 40,000 gallons that store distillate fuels or Jet fuels	
7.2 Unit: Group 2 Storage Tanks Internal floating roof storage tanks	
7.3 Unit: Truck Loading/Unloading Rack Control: Vapor Combustion Unit	
8.0 GENERAL PERMIT CONDITIONS	46
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	
8.6 Reporting Requirements	
8.7 Obligation to Comply with Title I Requirements	
9.0 STANDARD PERMIT CONDITIONS	51
9.1 Effect of Permit	
9.2 General Obligations of Permittee	
9.3 Obligation to Allow Illinois EPA Surveillance	
9.4 Obligation to Comply with Other Requirements	
9.5 Liability	
9.6 Recordkeeping	
9.7 Annual Emissions Report	
9.8 Requirements for Compliance Certification	
9.9 Certification	
9.10 Defense to Enforcement Actions	
9.11 Permanent Shutdown	
9.12 Reopening and Reissuing Permit for Cause	
9.13 Severability Clause	
9.14 Permit Expiration and Renewal	
10.0 ATTACHMENTS	
10.1 Attachment 1 - Summary of Storage Tank Features and Groupings	51
10.2 Attachment 2 - Example Certification by a Responsible Official	53

1.0 SOURCE IDENTIFICATION

1.1 Source

Williams Pipe Line Company - Chicago
10601 Franklin Avenue
Franklin Park, Illinois 60131-1405
708/455-1139

I.D. No.: 031096AFT
Standard Industrial Classification: 4613, Refined Petroleum
Pipeline Stations

1.2 Owner/Parent Company

Williams Pipe Line Company
One Williams Center
P.O. Box 3448
Tulsa, Oklahoma 74101-3448

1.3 Operator

Williams Pipe Line Company - Chicago
10601 Franklin Avenue
Franklin Park, Illinois 60131-1405

Sergio Garcia
708/455-1139

1.4 General Source Description

Williams Pipe Line Company - Chicago is located at 10601 Franklin Avenue in Franklin Park. The source is a petroleum bulk terminal for various petroleum products. Materials are transferred to the terminal by pipeline, truck, or rail where they may be temporarily stored at the source prior to shipment of the material to different destinations via the pipeline, or distributed to petroleum bulk plants or gasoline dispensing operations located within the surrounding community by way of truck. A truck loading rack is used for this purpose.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

acfm	actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
EFR	External Floating Roof
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
IFR	Internal Floating Roof
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kPa	Kilopascal
kW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound
MACT	Maximum Achievable Control Technology
m	Meter
m ³	cubic meter
mm Hg	millimeters of mercury
mmBtu	Million British thermal units
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
OM	Organic Material
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
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 Emissions 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
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
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:

Five (5) below-ground sump tanks of approximately 1000 gallon capacity each, which handle small amounts of petroleum, associated liquids and water.

Fixed roof, 39,606 gallon storage tank 272.

- 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 VOM emissions from leaking components, such as pump seals, valves, and flanges.

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

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

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

- 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	Emission Control Equipment
Group 1 Storage Tanks (See Attachment 1 for details)	Fixed roof storage tanks with a capacity greater than 40,000 gallons	Permanent submerged loading pipe
Group 2 Storage Tanks (See Attachment 1 for details)	Internal floating roof storage tanks	Internal Floating roof with primary seal and permanent submerged loading pipe
Tank Truck Loading Rack	Three bay petroleum product truck loading rack	Vapor Combustion Unit

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 (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 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 has a Reid vapor pressure in excess of the following:
 - a. Gasoline shall not exceed 9.0 psi (62.07 kPa); and
 - b. Ethanol blend gasolines shall not exceed the limitations of (a) above by more than 1.0 psi (6.9 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 Risk Management Plan

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

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

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

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 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.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 40 CFR Part 63, Subpart R, because the source is not a major source of HAPs. (See also Condition 5.5.2)

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:

- 5.4.1 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.
- 5.4.2 During the regulatory control period, May 1 through September 15 of each year, the Permittee shall state that the Reid vapor pressure of all gasoline or ethanol blends leaving the source for use in Illinois complies with the Reid vapor limitations of Condition 5.2.3. Any operation receiving this gasoline shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 218.585(b) and (c) (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 (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	97.6
Sulfur Dioxide (SO ₂)	--
Particulate Matter (PM)	--
Nitrogen Oxides (NO _x)	2.3
HAP, not included in VOM or PM	--
TOTAL	99.9

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. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the vapor weight percent of each HAP in the VOM emissions for each organic liquid and the VOM emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that this source is not a major source of HAP emissions and the requirements of 40 CFR Part 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 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 General Records for Storage Tanks

- a. The Permittee shall maintain a log identifying which unit-specific condition (Condition 7.1 and 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 of 40 m³ (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These

records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.

- i. The date* on which construction of the tank 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.

5.6.3 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the storage tanks at the source 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 are used for emission estimation.

5.6.4 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items, for each storage tank and truck loading rack to verify that the source is not a major source for HAP emissions and therefore not subject to 40 CFR Part 63, Subpart R, and to quantify annual VOM emissions, so as to

demonstrate compliance with the annual limits in Condition 5.5:

a. 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;
- iii. A copy of the supporting documentation for HAP vapor weight percent; and
- iv. A current analysis of the tank or tanks in each group that would have the greatest 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. Records maintained on a monthly basis for the previous month:

- i. The throughput of each organic liquid through each tank or group of tanks;
- ii. The VOM emissions attributable to each organic liquid stored at the source, tons/month, with supporting calculations, calculated utilizing an approved USEPA methodology, such as the TANKS program;
- iii. For each HAP identified as present, the total emissions of the individual HAP for all emission units at the source, in tons/month, with supporting calculations; and
- iv. Total emissions of each individual HAP, and combined HAPs from the source, in tons/month, with supporting calculations.

5.6.5 Records for Operating Scenarios

If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure

of less than 0.5 psia at 70°F as provided for in Condition 5.8, the Permittee shall maintain a log identifying 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.

5.6.6 Records for Pump and Compressor Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4.1.

- 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 or compressor 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 5.4.1, was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

5.6.7 Records for Gasoline Volatility

Pursuant to 35 IAC 218.585(h) (2), 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.

5.6.8 Retention and Availability of Records

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

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

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

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and
- b. The total annual emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the

month of February, the emissions from March of the preceding calendar year through February;12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

- a. The Permittee is authorized to store materials with a vapor pressure less than 0.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any storage tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.0 of this permit applicable to such tank based on the storage of VPL shall no longer apply. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of an emission unit, as defined in 35 IAC 201.102.
- b. Upon resuming storage of VPL in such a tank, the applicable unit-specific conditions of Section 7.0 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 applicable inspection of the tank for storage of VPL.

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM and HAP Emissions

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

- a. For the purpose of estimating VOM emissions from the storage tanks, the current version of the TANKS program is acceptable.
- b. For the purpose of estimating fugitive VOM emissions from leaking components at the source, the emission factors found in "Marketing Terminal Emission Factors" published by USEPA on the Technology Transfer Network bulletin board in February, 1995 are acceptable.
- c. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each organic liquid times the VOM emissions contributed by that organic liquid 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 storage tanks (Conditions 7.1 and 7.2), the truck loading rack (Condition 7.3), and fugitives.

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, as Condition 5.4.1 establishes appropriate compliance procedures for this rule that 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 during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

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

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

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

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

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

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

6.5 Emissions Excursion Compensation

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

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

6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

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

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 170 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 19.2895 tons per season.

A. This determination includes the use of 1992 and 1994 as baseline seasons. This determination includes use of the 1992 season as a substitute for the 1995 or 1996 season due to non-representative conditions in this season, as allowed by 35 IAC 205.320(a)(2).

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.11 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period during issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period during the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

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

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

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

6.9 Recordkeeping for ERMS

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

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

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

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

None

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

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit Group 1 Storage Tanks
Fixed roof storage tanks with a capacity greater than 40,000 gallons that store distillate fuels or jet fuels

7.1.1 Description

The Permittee operates fixed roof storage tanks to store distillate fuels and jet fuels. Permanent submerged loading is used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
715	Fixed roof tank	Permanent submerged loading pipe
716	Fixed roof tank	Permanent submerged loading pipe
1414	Fixed roof tank	Permanent submerged loading pipe
1415	Fixed roof tank	Permanent submerged loading pipe

7.1.3 Applicability Provisions

The affected tanks, for the purpose of these unit-specific conditions, are storage tanks that are not subject to the requirements of 35 IAC 218.120, 121, or 122 because the affected tanks are not used to store organic liquid with a maximum true vapor pressure of 0.5 psia or greater.

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.1.2. The status of all storage tanks at this source, including affected tanks, is summarized in Attachment 1.

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected tank(s) are not subject to 35 IAC 218.120, pursuant to 35 IAC 218.119(e), because the affected tanks are used to store a material with a maximum true vapor pressure of less than 0.5 psia.
- b. Each affected tank is not subject to the requirements of 40 CFR Part 60, Subparts K, Ka, or Kb, because the affected tanks were both, constructed prior to the applicability dates of the NSPS for Storage Vessels for Petroleum Liquids and used to store a material with a maximum true vapor pressure of less than 0.5 psia.

7.1.5 Control Requirements

None

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

Pursuant to Section 39.5(7)(a) of the Act and 35 IAC 218.119(a), the Permittee shall not store any organic liquid with a maximum true vapor pressure of 0.5 psia or greater.

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank to demonstrate compliance with Condition 7.1.7, pursuant to Section 39.5(7)(b) of the Act:

The storage of any organic liquid with a maximum true vapor pressure greater than 0.5 psia.

7.1.10 Reporting Requirements

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

Any storage of organic liquid with a maximum true vapor pressure greater than 0.5 psia in an affected tank within five (5) days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

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:

Changes in the material stored in an affected tank, provided the affected tank continues to comply with the Conditions in 7.1 of this permit.

7.1.12 Compliance Procedures

Emissions from each affected tank shall be determined through the use of the TANKS program.

7.2 Unit Group 2 Storage Tanks
Internal floating roof storage tanks

7.2.1 Description

The Permittee operates internal floating roof storage tanks to store various petroleum products. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Units Equipment and Air Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
654	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
721	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
722	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
723	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
724	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
746	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
811	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
812	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
1413	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal
1416	Internal floating roof tank	Permanent submerged loading pipe and internal floating roof with primary seal

7.2.3 Applicability Provisions

The "affected tanks", for the purpose of these unit-specific conditions, are storage tanks that are subject to the requirements of 35 IAC 218.121, 218.122(b), and 218.123(b). Each storage tank with a storage capacity of 151.42 cubic meters (approx. 40,000 gallons) or more,

storing volatile petroleum liquid (VPL), is subject to the requirements of 35 IAC 218.123(b) unless it is specifically excluded pursuant to 35 IAC 218.123(a). A tank may be permanently exempt based on applicability of a NSPS. A tank also may be exempt due to the current service, features, or other circumstances associated with the tank. A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3 °K (70 °F).

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

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected tank(s) are not subject to the requirements of 35 IAC 218.120, pursuant to 35 IAC 218.119(e), because the affected tanks are used solely for the storage of petroleum liquids.
- b. Each affected tank is not subject to the requirements of 40 CFR Part 60, Subparts K, Ka, or Kb, because the affected tanks were constructed prior to the date that the NSPS became applicable.

7.2.5 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)].

7.2.6 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

7.2.7 Operating Requirements

- a. Each affected tank shall be operated so that the floating roof including the seal closure devices meet each of the following requirements:
 - i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 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)].

7.2.8 Inspection Requirements

- a. The Permittee shall inspect the floating roof seals of each affected tank semiannually, the first inspection being prior to May 1 of each year, to insure compliance with the applicable control and operating requirements [35 IAC 218.123(b)(4)].
- b. The Permittee shall perform a complete inspection of the cover and seals of each affected tank whenever the tank is emptied for any reasons other than the transfer of 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)].

7.2.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank, pursuant to 35 IAC 218.123(b) (6):
 - i. A list of the types of volatile petroleum liquid stored on a monthly basis;
 - ii. The maximum true vapor pressure of each type of liquid as stored, psia; and
 - iii. The results of any inspections or measurements required by the Condition 7.2.8(a) and/or (b), including:
 - A. Type of inspection;
 - B. When the inspection and/or measurement was performed;
 - C. Who performed the inspection and/or measurement;
 - D. The method of inspection and/or measurement;
 - E. The observed condition of each feature of the floating roof (seals, roof deck, and fittings), with raw data recorded during the inspection and/or measurement; and
 - F. Summary of compliance.
- b. The Permittee shall maintain records of the following items for each affected tank to demonstrate compliance with Condition 7.2.8(b) (Cover and Seal Inspection) [35 IAC 218.123(b) (6)]:

Records that are sufficient to identify whenever the affected 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.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance 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. 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 7.2.5, e.g., "no permanent submerged loading pipe,") within five (5) days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
- b. Any storage of VPL in an affected tank that is not in out of compliance with the control requirements (Condition 7.2.5) due to damage, deterioration, or other condition of the tank, within thirty (30) days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Changes in the material stored in an affected tank, provided the affected tank continues to comply with the Conditions in 7.2 of this permit.
- b. Changes accounted for in Condition 5.8.

7.2.12 Compliance Procedures

Emissions from each affected tank shall be determined through the use of the TANKS program.

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 truck loading rack that consists of a total of three loading points. The VOM emissions from the truck loading rack occur when material is loaded into delivery vehicles. A vapor combustion/flare unit is used to capture and control the VOM emissions that occur as a result of displacement of vapors in the delivery vehicles. The VOM emissions from unloading material are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions that are attributed to the components, i.e., valves, flanges, etc. associated with the truck loading stations.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment	Date Constructed
Truck Loading Rack with Flare	Three bay loading rack used for loading various petroleum products into tank trucks	Vapor Combustion/Flare Unit	Prior to 1973 Flare - 1982

7.3.3 Applicability Provisions and Applicable Regulations

The "affected loading rack," for the purpose of these unit-specific conditions, is a truck loading rack that is subject to the requirements of 35 IAC 218.582 and relies on a vapor collection/combustion unit for compliance. 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.

7.3.4 Non-Applicability of Regulations of Concern

The affected loading rack is not subject to the requirements of 40 CFR Part 60, Subpart XX, because the affected loading rack was constructed prior to the applicability date (i.e., December 17, 1980) of the New Source Performance Standards for Bulk Gasoline Terminals. Although the flare system was constructed in 1982, the NSPS is only applicable to loading racks constructed or modified after December 17, 1980.

7.3.5 Control Requirements and Emission Limitations

The total organic compound emissions from the affected loading rack and associated vapor combustion unit shall not exceed the limitations of 35 IAC 218.582(a)(1), which requires that the affected loading rack be equipped and operated with a vapor control system that limits emissions of VOM to not more than 80 milligrams per liter (0.00067 lb/gal) of gasoline loaded from tank trucks during product loading.

7.3.6 Emission Limitations

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

N/A

7.3.7 Operating Requirements

- a. At all times during the loading of gasoline into any delivery vessel, the vapor control system shall operate and all vapors displaced in the loading of gasoline are to be vented only to the vapor control system. [35 IAC 218.582(a)(2)]
- b. 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)]
- c. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with the 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)]
- d. All loading and vapor return lines shall be equipped with fittings which are vapor tight. [35 IAC 218.582(a)(4)]
- e. The temperature controller set point of the vapor collection/combustion system of the affected loading rack shall be maintained at the manufacturer's recommended temperature but not lower than 1400°F.
- f. No person shall cause or allow the transfer of gasoline into a delivery vessel from the 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 which is 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 Part 60, Appendix A. Each vessel must be repaired and re-tested 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. Pilot flames shall be present at all times when loading occurs. The pilot flame shall be monitored using a thermocouple or equivalent device to detect the presence of a flame. The affected loading rack must be shut down and not allowed loading if a pilot flame is not detected in the associated vapor collection/combustion system.

7.3.9 Recordkeeping Requirements

a. General Recordkeeping

The Permittee shall maintain records of the following items for the affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.3.5, and 7.3. 7:

- i. The identification and properties of each organic liquid distributed through the affected loading rack, as related to emissions, i.e., vapor pressure and molecular weight;
- ii. The amount of each organic liquid distributed through the affected loading rack, in gallons per day, month, and year, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months;
- iii. Emissions of VOM attributable to loading of petroleum products, tons/month and tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology, such as Section 5.2 of the AP-42 and the control efficiency of the VCU as guaranteed by the manufacturer, with annual records updated each month by totaling the VOM emissions for that month plus the preceding 11 months.

b. Records of Operations

The Permittee shall maintain records of the following items 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 the affected loading rack for loading of any gasoline tank truck when there was no pilot flame present in the associated VCU or when the VCU was not operating at the appropriate temperature, 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 that loading occurred even though the VCU did not have a pilot flame or was not operating at the appropriate temperature.

ii. The use of the affected loading rack for the loading of any nonvapor-tight gasoline tank (one not meeting the requirements of Condition 7.3.7) 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), including:

- A. The date and time of the loading;
- B. The specific reason the vessel did not meet the requirements of Condition 7.5.7;
- C. Type of material loaded; and
- D. The reason why loading was allowed.

c. Inspection Requirements

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

A record of each leak inspection (Condition 7.3.7) 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, 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 maintain 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);

- 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 Deliver 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).

7.3.10 Reporting Requirements

a. Annual Report

The Permittee shall provide an annual report, to be submitted with the source's annual emissions report, which includes the following:

- i. The monthly and annual throughputs for the affected loading rack for each month of the previous calendar year, gallons/month and gallons/year, (e.g., for the annual totals, for the month of January, the throughput from February of the preceding calendar year through January; for the month of February, the throughput from March of the preceding calendar year through February; 12 months in all);
- ii. The monthly and annual emissions of VOM attributable to the loading of petroleum products for the affected loading rack for each month of the previous calendar year, tons/month and tons/year, (e.g., for the annual totals, for the month of January, the VOM emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the

preceding calendar year though February; 12 months in all); and

- iii. Summarization of any use of the affected loading rack to load delivery vessels (gasoline tank trucks) into trucks that did not meet the requirements of Condition 7.3.7, 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;
 - C. Type of material loaded; and
 - D. The reason why loading was allowed.

b. 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. These reports shall be submitted by the end of January and July of each year and shall include the following information for the preceding 6 month period:

- i. Summary of any use of the affected loading rack when there was no pilot flame present in the associated VCU, or the VCU was not operating at the appropriate temperature, including:
 - A. Date and time of occurrence;
 - B. Specific problem associated with the VCU or flame monitor;
 - C. Type of material being loaded; and
 - D. Reason why loading continued.
- ii. Summary of all times when the pilot flame was not detected including:
 - A. Date and time of occurrence;
 - B. Specific problem, i.e., the pilot flame was out or a malfunction of the flame monitoring equipment; and
 - C. Supporting data.

iii. Summary of times when the continuous temperature indicator was not functioning, including:

A. Date and time of occurrence; and

B. Specific problem associated with the indicator.

c. Reporting of Non-Compliance

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

Notification within 15 days of operation of the affected loading rack and/or associated vapor combustion unit in excess of the limitations of Condition 7.3.5.

d. 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 the 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

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

None

7.3.12 Compliance Procedures

a. Compliance with the emission limitations of Condition 7.3.5 and the operating requirements of Condition 7.3.7 shall be demonstrated through the inspection

and monitoring, recordkeeping and reporting requirements of Conditions 7.3.8, 7.3.9, and 7.3.10.

- b. Compliance with the control requirements of Condition 7.3.5 shall be demonstrated by the operating, inspection and monitoring, recordkeeping, and reporting requirements of Conditions 7.3.7, 7.3.8, 7.3.9, and 7.3.10 and shall be demonstrated by the manufacturers performance guarantee and operating the vapor combustion unit per recommended manufacturer's instructions as specified in the "Design Basis" of the operating manual.
- c. Monthly VOM emissions from the affected loading rack shall be determined by use of the following equation:

$$\text{Total VOM Emissions (lb/month)} = \text{Uncontrolled Emissions} \times [0.013 + 0.987 \times 0.05] + \text{Fuel Oil Throughput} \times LL_{fo}$$

where

$$\text{Uncontrolled Emissions (lb/month)} = \text{Gasoline Throughput} \times LL_g + \text{Ethanol Throughput} \times LL_e$$

where the gasoline, ethanol, and fuel oil throughputs are in gallons/month, and

$$LL_g = 6.8503 \text{ lb/1000 gallons of gasoline loaded}$$

$$LL_e = 0.538 \text{ lb/1000 gallons of ethanol loaded}$$

$$LL_{fo} = 0.0153 \text{ lb VOM/1000 Gallons of Fuel oil loaded}$$

are the loading loss emissions factors for gasoline, ethanol, and fuel oil respectively, based on the AP-42 equation for loading of tank trucks.

The values of 0.013 and 0.987 in the equation above represent the amount of one unit of emissions that are uncaptured and captured, respectively. Also, the value of 0.05 in the equation represents the amount of one unit of captured VOM emissions that left the control device uncontrolled.

- d. Monthly HAP emissions from the affected loading rack shall be determined by speciating the individual HAP emissions as a percentage of the gasoline and ethanol throughputs (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (c) above. Total monthly HAP emissions will be based on the sum of the emissions for each individual HAP.

- e. Emissions of NO_x from the flare shall be determined using an emission factor of 0.0334 lb Nox/1000 gallons (as prescribed by the manufacturer of the Vapor Combustion Unit).

(Gasoline Throughput, gal + Ethanol Throughput, gal)
x (The applicable emission factor, lb/1000 gal)

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after March 8, 2000 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes without applying for or obtaining an amendment to this permit, provided that the changes do not constitute a modification under Title I of the CAA, emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change and the Permittee provides written

notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change [Section 39.5(12)(a) of the Act]. This notice shall:

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

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

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

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

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

8.6.2 Test Notifications

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

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

8.6.3 Test Reports

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

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;

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

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
 - Illinois Environmental Protection Agency
 - Bureau of Air
 - Compliance Section (MC 40)
 - P.O. Box 19276
 - Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
 - Illinois Environmental Protection Agency
 - Division of Air Pollution Control
 - Eisenhower Tower
 - 1701 South First Avenue
 - Maywood, Illinois 60153
 - iii. Illinois EPA - Air Permit Section
 - Illinois Environmental Protection Agency
 - Division of Air Pollution Control
 - Permit Section (MC 11)
 - P.O. Box 19506
 - Springfield, Illinois 62794-9506
 - iv. USEPA Region 5 - Air Branch
 - USEPA (AR - 17J)
 - Air & Radiation Division
 - 77 West Jackson Boulevard
 - Chicago, Illinois 60604
- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to

the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

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

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

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

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirement 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)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Summary of Storage Tank Features and Groupings

TABLE 1-1

<u>Group/Tank #</u>	<u>Capacity (Barrels)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Maximum True Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Group 1							
715	27,000	Fixed roof	-	-	Distillate/ jet fuels	0.5	1973
716	27,000	Fixed roof	-	-	Distillate/ jet fuels	0.5	1973
1414	56,000	Fixed roof	-	-	Distillate/ jet fuels	0.5	1973
1415	56,000	Fixed roof	-	-	Distillate/j et fuels	0.5	1973
Group 2							
654	20,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products		1973
721	30,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973
722	30,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973
723	30,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973
724	30,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973

<u>Group/Tank #</u>	<u>Capacity (Barrels)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Maximum True Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
746	30,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973
811	80,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973
812	80,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973
1413	56,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973
1416	56,000	Internal floating roof	Vapor- mounted resilient	-	Various Petroleum Products	12.5	1973

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 _____

SIS:psj