

DRAFT/PROPOSED CAAPP PERMIT  
8/27/2013

Attention:

Rain CII Carbon LLC  
Attn: Dan Fearday, Plant Manager  
12187 East 950<sup>th</sup> Avenue  
Robinson, IL 62454

State of Illinois

CLEAN AIR ACT PERMIT  
PROGRAM (CAAPP) PERMIT

Source:

Rain CII Carbon LLC  
12187 East 950<sup>th</sup> Avenue  
Robinson, IL 62454

I.D. No.: 033025AAJ  
Permit No.: 95120092

Permitting Authority:

Illinois Environmental Protection Agency  
Bureau of Air, Permit Section  
217/785-1705

**CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT**

Type of Application: Renewal

Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 033025AAJ

Permit No.: 95120092

Statement of Basis No.: 95120092-1212

Date Application Received: December 6, 2007

Date Issued: TBD

Expiration Date: TBD

Renewal Submittal Date: 9 Months Prior to TBD

Source Name: Rain CII Carbon LLC

Address: 12187 East 950<sup>th</sup> Avenue

City: Robinson

County: Crawford

ZIP Code: 62454

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Justin Cameron at 217/785-1705.

Robert W. Bernoteit  
Acting Manager, Permit Section  
Division of Air Pollution Control

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

RWB:MTR:JTC:jws

cc: IEPA, Permit Section  
IEPA, FOS, Region 3  
Lotus Notes Database

Rain CII Carbon LLC  
I.D. No.: 033025AAJ  
Permit No.: 95120092

Date Received: 12/6/2007  
Date Issued: TBD

<u>Section</u>	<b>Table of Contents</b>	<u>Page</u>
<b>1</b>	<b>Source Information</b>	<b>3</b>
	1.1 Addresses	
	1.2 Contacts	
	1.3 Single Source	
<b>2</b>	<b>General Permit Requirements</b>	<b>4</b>
	2.1 Prohibitions	
	2.2 Emergency Provisions	
	2.3 General Provisions	
	2.4 Testing	
	2.5 Recordkeeping	
	2.6 Certification	
	2.7 Permit Shield	
	2.8 Title I Conditions	
	2.9 Reopening and Revising Permit	
	2.10 Emissions Trading Programs	
	2.11 Permit Renewal	
	2.12 Permanent Shutdown	
	2.13 Startup, Shutdown, and Malfunction	
<b>3</b>	<b>Source Requirements</b>	<b>12</b>
	3.1 Applicable Requirements	
	3.2 Applicable Plans and Programs	
	3.3 Title I Requirements	
	3.4 Synthetic Minor Limits	
	3.5 Reporting Requirements	
<b>4</b>	<b>Emission Unit Requirements</b>	<b>16</b>
	4.1 Material Handling and Process Operations	
	4.2 Petroleum Coke Calcining Operations	
	4.3 Fugitive Dust	
	4.4 Storage Tanks	
<b>5</b>	<b>Additional Title I Requirements</b>	<b>33</b>
<b>6</b>	<b>Insignificant Activities Requirements</b>	<b>34</b>
	6.1 Insignificant Activities Subject to Specific Regulations	
	6.2 Insignificant Activities in 35 IAC 201.210(a)	
	6.3 Insignificant Activities in 35 IAC 201.210(b)	
	6.4 Applicable Requirements	
	6.5 Compliance Method	
	6.6 Notification Requirements for Insignificant Activities	
<b>7</b>	<b>Other Requirements</b>	<b>37</b>
	7.1 Testing	
	7.2 PM Process Weight Rate Requirements	
	7.3 Startup Requirements	
	7.4 Malfunction Breakdown Requirements	
	7.5 Compliance Assurance Monitoring (CAM) Requirements	
<b>8</b>	<b>State Only Requirements</b>	<b>54</b>
	8.1 Permitted Emissions for Fees	
<b>Attachment 1</b>	<b>List of Emission Units at This Source</b>	<b>55</b>
<b>Attachment 2</b>	<b>Acronyms and Abbreviations</b>	<b>57</b>
<b>Attachment 3</b>	<b>Contact and Reporting Addresses</b>	<b>59</b>
<b>Attachment 4</b>	<b>Example Certification by a Responsible Official</b>	<b>60</b>

## Section 1 - Source Information

**1. Addresses**Source

Rain CII Carbon LLC  
12187 East 950<sup>th</sup> Avenue  
Robinson, IL 62454

Operator

Rain CII Carbon LLC  
12187 East 950<sup>th</sup> Avenue  
Robinson, IL 62454

Owner

Rain CII Carbon LLC  
2627 Chestnut Ridge Road, Suite 200  
Kingwood, TX 77339

Permittee

The Owner or Operator of the source as identified in this table.

**2. Contacts**Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Daniel Fearday	Plant Manager
<i>Delegated Authority</i>	N/A	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Daniel Fearday	618-544-2193 Ext. 105	dfearday@raincii.com
<i>Technical Contact</i>	Samuel McEwen	218-318-2412	smcewen@raincii.com
<i>Correspondence</i>	Daniel Fearday	618-544-2193 Ext. 105	dfearday@raincii.com
<i>Billing</i>	Daniel Fearday	618-544-2193 Ext. 105	dfearday@raincii.com

**3. Single Source**

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

## Section 2 - General Permit Requirements

### 1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

### 2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
  - i. An emergency occurred and the source can identify the cause(s) of the emergency.
  - ii. The source was at the time being properly operated.
  - iii. The source submitted notice of the emergency to the IEPA within 2 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.
  - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

### **3. General Provisions**

#### **a. Duty to Comply**

The source 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, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

#### **b. Need to Halt or Reduce Activity is not a Defense**

It shall not be a defense for the source 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]

#### **c. Duty to Maintain Equipment**

The source 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. [Section 39.5(7)(a) of the Act]

#### **d. 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 there under. [Section 39.5(7)(a) of the Act]

#### **e. Duty to Pay Fees**

- i. The source must pay fees to the IEPA 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]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

#### **f. Obligation to Allow IEPA Surveillance**

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
  - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
  - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

**g. Effect of Permit**

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall 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 the Owner or Operator of the 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 Clean Air Act.
  - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

**h. Severability Clause**

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source 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]

**4. Testing**

- a. 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. 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 IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
  - i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
  - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

**5. Recordkeeping**

**a. Control Equipment Maintenance Records**

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

**b. Retention of Records**

- i. 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]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

**c. Availability of Records**

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee

shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

## 6. Certification

### a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
  - A. The identification of each term or condition of this permit that is the basis of the certification.
  - B. The compliance status.
  - C. Whether compliance was continuous or intermittent.
  - D. 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.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

### b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

## 7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source 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 IEPA, 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 \*TBD (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way

Rain CII Carbon LLC  
I.D. No.: 033025AAJ  
Permit No.: 95120092

Date Received: 12/6/2007  
Date Issued: TBD

affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

## 8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR."
  - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
  - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN."
  - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
  - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

## 9. Reopening and Revising Permit

### a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or

termination, 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]

**b. Reopening and Revision**

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

**c. Inaccurate Application**

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

**d. Duty to Provide Information**

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA 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 source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

**10. 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]

**11. Permit Renewal**

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(l) and (o) of the Act]
- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

**12. Permanent Shutdown**

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item

Rain CII Carbon LLC  
I.D. No.: 033025AAJ  
Permit No.: 95120092

Date Received: 12/6/2007  
Date Issued: TBD

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.

**13. Startup, Shutdown, and Malfunction**

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

## Section 3 - Source Requirements

### 1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

#### a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, 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 toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.

- ii. Compliance Method (Fugitive Particulate Matter)

On an annual basis or upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as deemed as representative area to demonstrate compliance with the applicable regulations or as specified in a request from the Agency. Any requested observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

#### b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), 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:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

**c. Asbestos Demolition and Renovation**

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.
- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

**d. Future Emission Standards**

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee 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 Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

**2. Applicable Plans and Programs**

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

**a. Fugitive PM Operating Program**

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

**b. PM<sub>10</sub> Contingency Measure Plan**

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM<sub>10</sub> Contingency Measure Plan reflecting the PM<sub>10</sub> emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM<sub>10</sub> Contingency Measure Plan.

**c. Episode Action Plan**

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red

alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.

- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.
- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on October 31, 2012, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO<sub>2</sub>, PM<sub>10</sub>, NO<sub>2</sub>, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

**d. Risk Management Plan (RMP)**

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

**3. Title I Requirements**

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

**4. Synthetic Minor Limits**

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:

Rain CII Carbon LLC  
I.D. No.: 033025AAJ  
Permit No.: 95120092

Date Received: 12/6/2007  
Date Issued: TBD

- I. Requirements in Conditions 3.1(a)(i), 3.1(b), and 3.1(c).
- II. Requirements in Conditions 3.2(a) and 3.2(c).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

**b. Semiannual Reporting**

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

**c. Annual Emissions Reporting**

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

**Section 4 - Emission Unit Requirements**

**4.1 Material Handling and Processing Operations**

**1. Emission Units and Operations**

Operation	Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Green Coke Receiving and Storage	Green Coke Screening	PM	Pre-1972	N/A	None	None
	Green Coke Crushing	PM	Pre-1972	N/A	None	None
	Green Coke Stacking	PM	Pre-1972	N/A	Enclosures	None
	Green Coke Conveying	PM	Pre-1972	N/A	Enclosures	None
	Green Coke Feed Bins	PM	Pre-1972	N/A	None	None
Calcined Coke Load-out and Storage	Calcined Coke Conveying	PM	Pre-1972	N/A	Oscillating Conveyor	None
	Calcined Coke Storage Bins 1 & 2	PM	Pre-1972	N/A	Bin Vent Filters 1 & 2	None
	Calcined Coke Storage Bins 3 & 4	PM	Pre-1972	N/A	None	None
	Calcined Coke Railcar Load-out	PM	Pre-1972	N/A	Dedust Oil	None

**2. Applicable Requirements**

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. i. Opacity Requirements**

A. Pursuant to 35 IAC 212.123(a), 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.

**ii. Compliance Method (Opacity Requirements)**

**Monitoring**

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit listed in Condition 4.1.1, except for the Calcined Coke Storage Bins 1 & 2, in accordance with Method 22 for visible emissions at least once per month during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 2 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

B. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on Calcined Coke Storage

Bins 1 & 2, in accordance with Method 22 for visible emissions at least once per week during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 2 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 and Section 7.1 shall be conducted within one week in accordance with Condition 2.4.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- D. Pursuant to Section 39.5(7)(b) of the Act, if a Method 9 is performed as required by Condition 4.1.2(a)(ii)(A), the Permittee shall keep records for all opacity observations made in accordance with Method 9.

**b. i. Particulate Matter Requirements (PM)**

- A. Pursuant to 35 IAC 212.322(a), no person shall cause or allow the emission of PM into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c). (See Condition 7.2(b)).

**ii. Compliance Method (PM Requirements)**

Monitoring

- A. Pursuant to Section 39.5(7)(a) & (b) of the Act, the Permittee shall conduct external inspections of the control measures for the green coke stacking, green coke conveying, calcined coke conveying, and the calcined coke railcar load-out (i.e., enclosures, conveyors, and dedust oil operation) at least once per month for the specific purpose of verifying that these control measures to control emissions from the associated equipment are in place and being properly implemented.
- B. Pursuant to Section 39.5(7)(a) & (b) of the Act, the Permittee shall conduct internal inspections of the control measures for the calcined coke storage bins 1 & 2 bin vent filters during major turnarounds, but at least once every two years (24 months), for the specific purpose of verifying that these control measures to control emissions from the associated equipment are in place and being properly implemented.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records related to PM emissions from each emission unit:

**Section 4 - Emission Unit Requirements**  
**4.1 - Material Handling and Processing Operations**

- I. A file containing the method used by the Permittee to determine emissions of PM, with supporting documentation.
  - II. The hours of operation for each emission unit, hr/mo and hr/yr.
  - III. The emissions of PM from each emission unit, ton/mo and ton/yr (12 month rolling average, calculated at least monthly), with supporting calculations.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the following records, which shall demonstrate compliance with Conditions 4.1.2(b)(ii)(A & B), for the inspections related to the bin vent filters associated with the calcined coke storage bins 1 & 2:
- I. Condition of each filter.
  - II. Whether a filter was replaced at the time of an inspection, or rationale explaining why the filter did not need to be replaced at that time.
  - III. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, and identification of equipment being inspected.
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain a record of the amount of Dedust oil used on the Calcined Coke Railcar Load-out system, gal/mo and gal/yr.

**c. i. Work Practice Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate each emission unit in a manner consistent with safety and good air pollution control practice for minimizing emissions.

**ii. Compliance Method (Work Practice Requirements)**

**Monitoring**

- A. Pursuant to Sections 39.5(7)(a) & (b) of the Act, at a minimum, the Permittee shall perform monthly inspections of the green coke screening, green coke crushing, green coke feed bins, and calcined coke storage bins 3 & 4 and their associated auxiliary equipment.

Note: Inspections/monitoring for the green coke stacking, green coke conveying, calcined coke conveying, calcined coke storage bins 1 & 2m and calcined coke railcar load-out with their associated emission control devices (i.e., enclosures, conveyors, bin vent filters, and dedust oil operation) are covered by Conditions 4.1.2(b)(ii)(A & B) and 4.1.2(a)(ii)(A & B).

**Recordkeeping**

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed, pursuant to Condition 4.1.2(c)(ii)(A), along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

**3. Non-Applicability Determinations**

- a. The Green Coke Screening, Green Coke Crushing, Green Coke Feed Bins, Calcined Coke Storage Bins 3 & 4, the Calcined Coke Railcar Load-out, and the Calcined Coke Conveying are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the these emission units do not use add-on control devices to achieve compliance with any emission limitations or standards.
- b. The Green Coke Stacking, Green Coke Conveying, the Calcined Coke Storage Bins 1 & 2 are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the these emission units use a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

**4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), and 4.1.2(c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

4.2 Petroleum Coke Calcining Operations

**1. Emission Units and Operations**

Emission Units		Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Petroleum Coke Calcining Line 1	Kiln 1 (37 mmBtu/hr)	PM, SO <sub>2</sub> , and VOM	Pre 1972	N/A	Pyroscrubber 1	Thermocouples on Pyroscrubber
	Rotary Cooler 1	PM	Pre 1972	N/A	Baghouse 1	Pressure Gauge and Inlet Temp. Monitor on Baghouse
Petroleum Coke Calcining Line 2	Kiln 2 (37 mmBtu/hr)	PM, SO <sub>2</sub> , and VOM	Pre 1972	N/A	Pyroscrubber 2	Thermocouples on Pyroscrubber
	Rotary Cooler 2	PM	Pre 1972	N/A	Baghouse 2	Pressure Gauge and Inlet Temp. Monitor on Baghouse

**2. Applicable Requirements**

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), 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.

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall monitor the opacity on pyroscrubbers 1 and 2 and baghouses 1 and 2 during representative operating conditions and weather conditions determined by a qualified observer, using Reference Method 9 like visible emission observations, at least once per operating day.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each opacity observation required by Condition 4.2.2(a)(ii)(A). These records shall, at a minimum, contain the following:

- I. Identification of the equipment for which the observation was conducted.
- II. Date and time of the observation.
- III. Name of observer(s) with documentation that the individual(s) was qualified to make such an observation.
- IV. Description of the observations that were made.
- V. Description of the operating conditions of the equipment during the observation.

- VI. The weather condition at the time of the scheduled observations, and if the observations could not be completed due to weather conditions at the time of the scheduled observations, the record shall state the reason(s) why.
- VII. The raw data sheets for the observations.
- VIII. The observed opacity.
- IX. Conclusion.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.322(a), for the kilns and rotary coolers, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c) (See Condition 7.2(b)).

ii. Compliance Method (PM Requirements)

- A. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the kilns are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.6 and Tables 7.6.2 and 7.6.4, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).
- B. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the rotary coolers are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.6 and Tables 7.6.5 and 7.6.6, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Testing

- C. Pursuant to Section 39.5(7)(d)(ii) of the Act, during normal operation, the Permittee shall have the PM emissions from each kiln measured as specified below:
  - I. The initial PM emission measurements shall be made no later than one year after the effective date of this Condition.
  - II. PM emissions shall be measured thereafter at least once every 5 years, but no later than 9 months from the expiration date of this permit.
  - III. Measurements of PM shall be made in accordance with applicable USEPA Test Method(s), specifically Method 5, and also following Condition 7.1 of this permit.

c. i. Sulfur Dioxide Requirements (SO<sub>2</sub>)

A. Pursuant to 35 IAC 214.301, for the kilns, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.

ii. Compliance Method (SO<sub>2</sub> Requirements)

Monitoring

A. Pursuant to Section 39.5(7)(a) & (b) of the Act, the Permittee shall sample and analyze the green coke feed to the kilns to determine the actual sulfur content (%) on a weekly basis. The Permittee is allowed to utilize data provided by the feed supplier in lieu of a weekly sample.

Testing

B. Pursuant to Section 39.5(7)(d)(ii) of the Act, to demonstrate compliance with Condition 4.2.2(c)(i)(A), during normal operation, the Permittee shall have the SO<sub>2</sub> emissions measured from each kiln, on an in-stack basis (i.e., wet basis), as specified below:

- I. The initial SO<sub>2</sub> emission measurements shall be made no later than one year after the effective date of this Condition.
- II. SO<sub>2</sub> emissions shall be measured thereafter at least once every two years.
- III. Measurements of SO<sub>2</sub> shall be made in accordance with applicable USEPA Test Method(s), specifically Method(s) 6 and/or 6C, and also following Condition 7.1 of this permit.

Recordkeeping

C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records related to the feed (green coke) to the kilns:

- I. Records for each shipment of feed received, including the amount received and supplier.
- II. Records of the sulfur content (%) of the feed. If the Permittee utilized data provided by the feed supplier for the sulfur content, the documentation of the sulfur content as provided to the Permittee.

D. The recordkeeping required by Condition 4.2.2(e)(ii)(A) shall also be used to demonstrate compliance with Condition 4.2.2(c)(i)(A).

E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain monthly and annual records of SO<sub>2</sub> emissions from each kiln (tons/mo and tons/year), with supporting calculations.

d. i. Volatile Organic Material Requirements (VOM)

A. Pursuant to 35 IAC 215.302(c), for the kilns, emissions of organic material in excess of those permitted by 35 IAC 215.301 are allowable because VOM emissions are controlled by air pollution control equipment (i.e., the pyroscrubbers) capable of reducing by 85 percent or more the uncontrolled organic material that would be otherwise emitted to the atmosphere.

ii. Compliance Method (VOM Requirements)

- A. Pursuant to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, the kilns are subject to 40 CFR Part 64. The Permittee shall comply with the monitoring requirements of the CAM Plan described in Condition 7.6 and Tables 7.6.1 and 7.6.3, pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. At all times, the Owner or Operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment, pursuant to 40 CFR 64.7(a) and (b).

Testing

- B. Pursuant to Section 39.5(7)(d)(ii) of the Act, during normal operation, the Permittee shall have the VOM destruction efficiency of each pyroscrubber associated with each kiln determined as specified below:
  - I. The initial VOM destruction efficiencies shall be made no later than one year after the effective date of this Condition.
  - II. VOM destruction efficiencies shall be measured thereafter at least once every 5 years, but no later than 9 months from the expiration date of this permit.
  - III. Measurements of the VOM destruction efficiencies for each pyroscrubber shall be made in accordance with applicable USEPA Test Method(s), specifically Method(s) 25 and/or 25A, and also following Condition 7.1 of this permit.

e. i. Operational and Production Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only supplemental heat source fired in each kiln and/or pyroscrubber.
- B. Pursuant to Construction Permit #04080044 and Permit #75110042, kiln 1 and kiln 2 shall not exceed the following green coke feed rate limits: [T1]

Green Coke Feed  
Rate Limit  
(Tons/hr)

Kiln 1	28
Kiln 2	28

- C. Pursuant to Permit #75110042, operation of the coolers shall not exceed the following limits: [T1]

Process Weight Rate  
(Tons/hr)

Rotary Cooler 1	29.9
Rotary Cooler 2	29.9

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:

- I. Hours of operation for each kiln, hr/day, hr/mo, and hr/yr.
  - II. Hours of operation for each rotary cooler, hr/mo and hr/yr.
  - III. Throughput of green coke, T/day, T/mo, and T/yr, method used to determine the throughput.
  - IV. Green coke feed rate to each kiln, T/hr, with supporting calculations.
  - V. Operation of each rotary cooler, T/hr, with supporting calculations.
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records related to the natural gas fired at the facility:
- I. Natural gas fuel usage (scf/mo and scf/yr, and/or mmBtu/mo and mmBtu/yr).
  - II. Heat content of the natural gas (Btu/ft<sup>3</sup>), with supporting documentation, on a quarterly basis.
- C. Compliance with annual limits shall be determined from a running total of 12 months of monthly data.

f. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate all equipment associated with the Petroleum Coke Calcining Operations in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(a) & (b) of the Act, at a minimum, the Permittee shall perform external inspections of each kiln, rotary cooler, baghouse, pyroscrubber, and associated auxiliary equipment at least once per week.
- B. I. Pursuant to Sections 39.5(7)(a) & (b) of the Act, at a minimum, the Permittee shall perform internal inspections of each kiln, rotary cooler, pyroscrubber, and associated auxiliary equipment during major turnarounds, but at least once every two years.
- II. Pursuant to Sections 39.5(7)(a) & (b) of the Act, at a minimum, the Permittee shall perform internal inspections of each baghouse at least once per year.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment being inspected, findings of the inspections (e.g., condition of the bag filters during the internal inspections), operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

**3. Non-Applicability Determinations**

- a. The petroleum coke calcining lines are not subject to the New Source Performance Standards (NSPS) for Calciners and Dryers in Mineral Industries, 40 CFR Part 60 Subpart UUU, because the petroleum coke calcining lines are not located at a mineral processing plant as defined by 40 CFR 60.731.
- b. The Kilns 1 & 2 are not subject to 40 CFR Part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, because the kilns by definition are not boilers or process heaters as defined by 40 CFR 63.7575.
- c. The kilns associated with the Petroleum Coke Calcining Operations are not subject to 35 IAC 214.122 because the kilns are not by definition "new emission sources" pursuant to 35 IAC 201.102.
- d. The kilns are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the kilns are not fuel combustion emission units as defined by 35 IAC 211.2470.
- e. The kilns are not subject to 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources, because the kilns are not fuel combustion emission units as defined by 35 IAC 211.2470.
- f. The kilns are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, for SO<sub>2</sub>, because the kilns do not use an add-on control device to achieve compliance with an emission limitation or standard associated with SO<sub>2</sub>.

**4. Other Requirements**

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. Start-up, Shutdown, and Malfunction Breakdown Requirements**

i. Authorization for State Requirements

A. Start-up Requirements

Pursuant to 35 IAC 201.149, 201.261, and 201.262, the source is authorized to operate kiln 1 and kiln 2 and their associated pyroscrubbers (i.e., pyroscrubber 1 and pyroscrubber 2) in violation of the applicable requirements of Conditions 4.2.2(a)(i)(A) and 4.2.2(b)(i)(A) during startup. The Permittee shall comply with all applicable requirements in Section 7.3 of this permit.

B. Malfunction Breakdown Requirements

Pursuant to 35 IAC 201.149, 201.261, and 201.262, the source is authorized to continue operation of kiln 1 and kiln 2 and their associated pyroscrubbers (i.e., pyroscrubber 1 and pyroscrubber 2) and rotary cooler 1 and rotary cooler 2 and their associated baghouses (i.e., baghouse 1 and baghouse 2) in violation of the applicable requirements of Conditions 4.2.2(a)(i)(A) and 4.2.2(b)(i)(A) during malfunction breakdown. The Permittee shall comply with all applicable requirements in Section 7.4 of this permit.

**b. Operational Flexibility Requirements**

- i. Pursuant to Section 39.5(12)(a) of the Act, the Permittee is allowed to operate the Petroleum Coke Calcining Operation using the following operational methods:

Rain CII Carbon LLC  
I.D. No.: 033025AAJ  
Permit No.: 95120092

Date Received: 12/6/2007  
Date Issued: TBD

- A. If only one kiln is operating, and the cooler baghouse for the other kiln is in working condition, the cooler vent may be rerouted to the other baghouse (e.g., cooler 1 emissions may be vented to the baghouse for cooler 2 emissions provided that Petroleum Coke Calcining Unit 2 is not in operation at such time, and vice versa).
- ii. Pursuant to Section 39.5(12)(a) of the Act, the Permittee shall provide written notification to the USEPA and the Illinois EPA, as required by Section 39.5(12)(a)(i) of the Act, at least 7 days in advance of the proposed changes permitted in Condition 4.2.4(b)(i)(A), above.

## 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), and 4.2.2(f)(i).
  - B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

4.3 Fugitive Dust

**1. Emission Units and Operations**

Emission Unit	Description	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Fugitive Emissions	Vehicular Traffic on Roadways, Parking Lots, and Other Open Areas  Unloading Operations (Uncontrolled)  Storage Piles and Associated Activities (Green Coke Storage Piles, Etc.)	PM	N/A	N/A	Moisture Content	None

**2. Applicable Requirements**

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123(a), 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.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. At least once each year or if requested by the Illinois EPA, pursuant to Section 39.5(7)(a) and Section 39.5(7)(d) of the Act, as provided by 35 IAC 212.107, for both fugitive and non-fugitive particulate matter emissions, a determination as to the presence or absence of visible emissions from emission units shall be conducted in accordance with Method 22, 40 CFR part 60, Appendix A, except that the length of the observing period shall be at the discretion of the observer, but not less than one minute. This test method shall be used to determine compliance with 35 IAC 212.123. If visible emissions are observed, the Permittee shall conduct a Method 9 in accordance with Condition 4.3.2(a)(ii)(B), below.
- B. Pursuant to Section 39.5(7)(a) and Section 39.5(7)(d) of the Act, upon reasonable request by the Illinois EPA or following an observation as described in Condition 4.3.2(a)(ii)(A), above, in which visible emissions were observed the Permittee shall conduct a Method 9 in accordance with the following, as provided by 35 IAC 212.109, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR part 60, Appendix A, except that for roadways and parking areas the number of readings required for each vehicle pass will be three taken at 5-second intervals. The first reading shall be at the point of maximum opacity and second and third readings shall be made at the same point, the observer standing at right angles to the plume at least 15 feet away from the plume and observing 4 feet above the surface of the roadway or parking area. After four vehicles have passed, the 12 readings will be averaged.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, for Condition 4.3.2(a)(ii)(A), the Permittee shall keep records for each opacity observation performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of what was observed, whether the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- D. Pursuant to Section 39.5(7)(b) of the Act, for Condition 4.3.2(a)(ii)(B), the Permittee shall keep records for all opacity measurements made in accordance with Method 9. These records shall include, at a minimum: date and time the Method 9 was performed, name(s) of observing personnel, identification of which equipment, roadway, or parking lot was observed, whether or not the equipment was running properly, and the opacity readings observed.

**b. i. Particulate Matter Requirements (PM)**

- A. The affected operations shall comply with the standard in Condition 3.1(a)(i), which addresses visible emissions of fugitive particulate matter, as defined by 35 IAC 211.2490. Specifically, 35 IAC 212.301.

ii. Compliance Method (PM Requirements)

Monitoring

- A. The source shall comply with the monitoring in Condition 3.1(a)(ii).

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
  - I. PM emissions associated with vehicular traffic, unloading operations, and storage piles, ton/mo and ton/yr (12 month rolling average, calculated monthly), with supporting documentation and calculations.

**c. i. Work Practice Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall maintain and operate all equipment, roadways, parking lots, and storage piles in a manner consistent with safety and good air pollution control practice for minimizing emissions.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(a) & (b) of the Act, at a minimum, the Permittee shall perform monthly inspections of the unloading hopper, the load-out spouts, and associated auxiliary equipment.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum: date and time inspections were performed, name(s) of inspection personnel, identification of equipment

being inspected, findings of the inspections, operation and maintenance procedures, and a description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

**3. Non-Applicability Determinations**

- a. Fugitive emissions at the source are not subject to the requirements of 35 IAC 212.302, therefore, 35 IAC 212.304 through 212.310 and 35 IAC 212.312 do not apply, because the source is not located in a geographical area as listed in 35 IAC 212.302.
- b. Pursuant to 35 IAC 212.323, fugitive emissions at the source are not subject to the requirements of 35 IAC 212.321 or 212.322, Process Weight Rate, because due to the disperse nature of such emission units, such rules cannot reasonably be applied.
- c. The fugitive emissions at the facility are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because there are no add-on control devices used to achieve compliance with an emission limitation or standard.

**4. Other Requirements**

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

**5. Reporting Requirements**

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

**a. Prompt Reporting**

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), and 4.3.2(c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

4.4 Storage Tanks

**1. Emission Units and Operations**

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
250 Gallon Gasoline Storage Tank	VOM and HAP	2004	N/A	Submerged Loading Pipe	None
15,000 Gallon Dedust Oil Storage Tank	VOM	1996	N/A	Submerged Loading Pipe	None

**2. Applicable Requirements**

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

**a. i. Volatile Organic Material Requirements (VOM)**

- A. Pursuant to 35 IAC 215.122(b), for the dedust oil tank, no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe.
- B. Pursuant to 35 IAC 215.583(a)(1), for the gasoline storage tank, no person shall cause or allow the transfer of gasoline from any delivery vessel into any stationary storage tank at a gasoline dispensing facility unless the tank is equipped with a submerged loading pipe.

**ii. Compliance Method (VOM Requirements)**

Monitoring

- A. Pursuant to Sections 39.5(7)(a) of the Act, at a minimum, the Permittee shall perform an annual inspection of the gasoline storage tank and its associated auxiliary equipment. During the inspection, the Permittee shall ensure the presence of submerged loading pipe in the tank that is in working condition.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance and repair log. These records shall include, at a minimum, the following:
  - I. Date and time inspections were performed;
  - II. Name(s) of inspection personnel;
  - III. Identification of equipment being inspected;
  - IV. Findings of the inspections, which shall specifically note the presence of a submerged loading pipe for the gasoline storage tank;
  - V. Operation and maintenance procedures; and
  - VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain the following records:
- I. Emissions of VOM from each tank, tons/mo and ton/yr (12 month rolling average, calculated monthly), with supporting calculations;
  - II. Design information for each tank showing the presence of a permanent submerged loading pipe;
  - III. The type of liquid stored in each tank and throughput of each tank, gal/month and gal/yr.

### 3. Non-Applicability Determinations

- a. The storage tanks are not subject to the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels), 40 CFR Part 60 Subpart Kb, because the storage tanks do not have design capacities that are equal to or greater than 75 m<sup>3</sup>(19,800 gallons).
- b. The gasoline storage tank is not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for Source Category: Gasoline Dispensing Facilities, 40 CFR Part 63 Subpart CCCCC, because the gasoline storage tank is not located at an area source of HAPs.
- c. The gasoline storage tank and the kerosene storage tank are not subject to the requirements of 35 IAC 215.123, petroleum liquid storage tanks, pursuant to 35 IAC 215.123(a)(2), which exempts storage tanks with a capacity less than 151.42 m<sup>3</sup>.
- d. The gasoline storage tanks are not subject to the requirements of 35 IAC 215.301 because the tanks do not use an organic material in a manner that subjects this regulation.
- e. The gasoline storage tank is not subject to 35 IAC 215.583(a)(2), because pursuant to 35 IAC 215.583(b)(3), the gasoline storage tank has a capacity of less than 575 gallons.
- f. The dedust oil storage tank is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the dedust oil storage tank uses a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.
- g. The gasoline storage tank is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the gasoline storage tank is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

### 4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

### 5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

#### a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
  - I. Requirements in Conditions 4.4.2(a)(i).

Rain CII Carbon LLC  
I.D. No.: 033025AAJ  
Permit No.: 95120092

Date Received: 12/6/2007  
Date Issued: TBD

- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
  - A. Date and time of the deviation.
  - B. Emission unit(s) and/or operation involved.
  - C. The duration of the event.
  - D. Probable cause of the deviation.
  - E. Corrective actions or preventative measures taken.

**Section 5 - Additional Title I Requirements**

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

**Section 6 - Insignificant Activities Requirements**

**1. Insignificant Activities Subject to Specific Regulations**

This condition is reserved for insignificant activities as defined in 35 IAC 201.210 and 201.211 which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act.

**2. Insignificant Activities in 35 IAC 201.210(a)**

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Direct combustion units used for comfort heating and fuel combustion emission units as further detailed in 35 IAC 201.210(a)(4).	Small Space Heaters and other units	35 IAC 201.210(a)(4)
Storage tanks < 10,000 gallon with annual throughput < 100,000 gallon (not storing gasoline or any material listed as a HAP).	6	35 IAC 201.210(a)(10)

**3. Insignificant Activities in 35 IAC 201.210(b)**

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

**4. Applicable Requirements**

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), 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 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 215.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- e. Pursuant to 35 IAC 215.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery

Rain CII Carbon LLC  
 I.D. No.: 033025AAJ  
 Permit No.: 95120092

Date Received: 12/6/2007  
 Date Issued: TBD

system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 215.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

**5. Compliance Method**

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed.
- b. Potential to emit emission calculations before any air pollution control device for each insignificant activity listed in Condition 6.2.
- c. Records of the throughput (gal/yr) for each storage tank listed in Condition 6.2.

**6. Notification Requirements for Insignificant Activities**

The source shall notify the IEPA accordingly to the addition of insignificant activities:

**a. Notification 7 Days in Advance**

- i. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
  - A. A description of the emission unit including the function and expected operating schedule of the unit.
  - B. A description of any air pollution control equipment or control measures associated with the emission unit.
  - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
  - D. The means by which emissions were determined or estimated.
  - E. The estimated number of such emission units at the source.
  - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), 35 IAC 201.146(kkk), and Sections 39.5(12)(a) and (b) of the Act; for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.
- iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any change made in Condition 6.6(a) above.

**b. Notification Required at Renewal**

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

**c. Notification Not Required**

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

## Section 7 - Other Requirements

### 1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
  - i. The name and identification of the emission unit(s) being tested.
  - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
  - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
  - iv. 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 emission unit and any control equipment will be determined.
  - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
  - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
  - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
  - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
  - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
  - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
  - ii. A summary of results.
  - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
  - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
  - v. Detailed description of test conditions, including:
    - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
    - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
    - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
  - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
  - vii. An explanation of any discrepancies among individual tests or anomalous data.
  - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
  - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
  - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

<b>2. PM Process Weight Rate Requirements</b>
---

**a. New Process Emission Units - 35 IAC 212.321**

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]

ii. Interpolated and extrapolated values of the data in 35 IAC 212.321(c) shall be determined by using the equation [35 IAC 212.321(b)]:

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)  
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54  
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8  
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321(c)]:

P (T/hr)	E (lbs/hr)	P (T/hr)	E (lbs/hr)
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

**b. Existing Process Emission Units - 35 IAC 212.322**

Existing Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322].

i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any process emission unit for which construction or modification

commenced prior to April 14, 1972, which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322(c)). See Condition 7.2(b)(iii) below. [35 IAC 212.322(a)]

- ii. Interpolated and extrapolated values of the data in 35 IAC 212.322(c) shall be determined by using the equation [35 IAC 212.322(b)]:

$$E = C + A(P)^B$$

Where:

P = Process weight rate (T/hr)  
E = Allowable emission rate (lbs/hr)

- A. Process weight rates of less than 30 T/hr:

A = 4.10  
B = 0.67  
C = 0

- B. Process weight rates greater than or equal to 30 T/hr:

A = 55.0  
B = 0.11  
C = -40.0

- iii. Limits for Existing Process Emission Units [35 IAC 212.322(c)]:

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	35.40
0.10	0.87	30.00	40.00
0.2	1.40	35.00	41.30
0.30	1.83	40.00	42.50
0.40	2.22	45.00	43.60
0.50	2.58	50.00	44.60
0.75	3.38	100.00	51.20
1.00	4.10	150.00	55.40
2.00	6.52	200.00	58.60
3.00	8.56	250.00	61.00
4.00	10.40	300.00	63.10
5.00	12.00	350.00	64.90
10.00	19.20	400.00	66.20
15.00	25.20	450.00	67.70
20.00	30.50	500.00	69.00

**3. Startup Requirements**

**a. Startup Provisions**

Pursuant to 35 IAC 201.149, 201.261, and 201.262, the source is authorized to operate in violation of the applicable requirements (as referenced in Section 4 of this CAAPP permit) during startup. The source has applied for such authorization in its application, generally describing the efforts that will be used "...to minimize startup emissions, duration of individual starts, and frequency of startups." As provided by 35 IAC 201.265, authorization in this CAAPP permit for excess emissions during startup does not shield the source from enforcement for any violation of applicable emission standard(s) that occurs during startup and only constitutes a prima facie defense to such an enforcement action provided that the source has fully complied with all terms and conditions connected with such authorization.

- i. This authorization does not relieve the source from the continuing obligation to demonstrate that all reasonable efforts are made to minimize startup emissions, duration of individual starts, and frequency of startups.
- ii. The source shall conduct startups in accordance with written startup procedures prepared by the source and maintained at the source, that are specifically developed to minimize startup emissions, duration of individual starts, and frequency of startups.
- iii. The authorization provided by Condition 4.2.4(a)(i)(A) is subject to the following:
  - A. Implementation of established startup procedures;
  - B. Neither kiln shall begin a cold startup if the baghouse controlling that kiln cooler is not operating properly unless the other kiln is not in service and its baghouse is available for control of PM emissions.
  - C. During a cold startup, natural gas shall be used as a supplemental heat source to the kiln and/or pyroscrubber from the time of initial preheating in order to minimize the time period to reach standard operating temperature (~1800°F) in the pyroscrubber.
  - D. During a "warm" startup, following a temporary shutdown, when green coke feed is resumed, natural gas shall be used as a supplemental heat source to the kiln in order to reach standard operating temperature (~1800°F) temperature in the pyroscrubber as quickly as possible.

**b. Monitoring - Recordkeeping**

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain the following recordkeeping requirements for startup procedures:

- i. A copy of the most recent startup procedures that contains at a minimum:
  - A. Estimates of excess emissions for each regulated air pollutant at startup.
  - B. Reasonable steps that will be used to minimize startup emissions, duration of individual starts, and frequency of startups.
- ii. Records for each individual startup that contains at a minimum:
  - A. Date, time, duration, and description of the startup.
  - B. Whether the most recent startup procedures were performed. If not performed, an explanation why the procedures were not performed.

- C. An explanation of whether emissions during the startup exceeded the estimates in the startup procedures and whether emissions exceeded any applicable standard or limit not authorized to be violated during startup.

c. Monitoring - Reporting

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

i. Prompt Reporting

A Deviation Report shall be submitted to the IEPA, Compliance Section (addresses are included Attachment 3) within five (5) days if a startup exceeded the emission estimates in the startup procedures or emissions exceeded any applicable standard or limit not authorized to be violated during startup.

ii. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a startup report including the following at a minimum: a list of the startups including the date, duration, and description of each startup accompanied by any explanations whether the most recent startup procedures were or were not performed.

**4. Malfunction Breakdown Requirements**

**a. Malfunction Breakdown Provisions**

Pursuant to 35 IAC 201.149, 201.261, and 201.262, the source is authorized to continue operation in violation of the applicable requirements (as referenced in Section 4 of the CAAPP permit) during malfunction or breakdown. The source has applied for such authorization in its application, generally describing "such continued operation is necessary to prevent injury to persons or severe damage to equipment; or that such continued operation is required to provide essential services; provided, however, that continued operation solely for the economic benefit of the source shall not be sufficient for granting of permission." As provided by 35 IAC 201.265, authorization in this CAAPP permit for continued operation during malfunction or breakdown does not shield the source from enforcement for any violation of applicable emission standard(s) that occurs during malfunction or breakdown and only constitutes a prima facie defense to such an enforcement action provided that the source has fully complied with all terms and conditions connected with such authorization.

- i. Upon continued operation in violation of the applicable requirements during malfunction or breakdown, the source shall as soon as practical, remove from service and repair the emission unit(s) or undertake other measures as described in the application so that any violation of the applicable requirements cease.
- ii. For continued operation in violation of the applicable requirements during malfunction or breakdown, the time shall be measured from the start of a particular incident and ends when violation of the applicable requirements ceases. The absence of a violation of the applicable requirements for a short period shall not be considered to end the incident if a violation of the applicable requirements resume. In such circumstances, the incident shall be considered to continue until corrective measures are taken so that a violation of the applicable requirements cease or the source takes the emission unit(s) out of service.
- iii. Following notification to the IEPA of continued operation in violation of the applicable requirements during malfunction or breakdown, the source shall comply with all reasonable directives of the IEPA with respect to such incident, pursuant to 35 IAC 201.263. Specifically, the Permittee shall repair the damaged feature(s) of the affected Petroleum Coke Calcining Operations or remove the kiln(s) from service as soon as practicable. This shall be accomplished within 1 day unless the feature(s) cannot be repaired within one day and the kiln(s) cannot be removed from service within one day, and the Permittee obtains an extension, for up to three days, from the Illinois EPA. The request for such an extension must document that parts or servicing are unavailable and specify a schedule of actions the Permittee will take that will assure the feature(s) will be repaired or the kilns removed as soon as possible.
- iv. In the event of a malfunction or breakdown, the Permittee shall follow the following operational procedures in order to minimize the emissions that may result from the malfunction or breakdown:
  - A. If only one kiln and one cooler is operating, and the cooler baghouse for the other kiln is in working condition, the cooler vent may be rerouted to the other baghouse.
  - B. If both kilns are operating and the No. 1 baghouse has a malfunction, the Rotary Cooler No. 1 shall be vented to its own pyroscrubber. If the malfunction occurs for 30 minutes or greater, the kiln operating rate shall be reduced to 18 tons/hr of green coke.
  - C. If both baghouses undergo malfunction at the same time, each cooler shall be vented to its own respective pyroscrubber. If the malfunction occurs for 30

minutes or greater, each kiln operating rate shall be reduced to 18 tons/hr of green coke.

- D. If both kilns are operating and baghouse No. 2 malfunctions, Rotary Cooler No. 2 shall be vented to its own pyroscrubber. If the malfunction occurs for 30 minutes or greater, the kiln operating rate shall be reduced to 18 tons/hr of green coke.

**b. Monitoring - Recordkeeping**

Pursuant to Section 39.5(7)(b) of the Act and 35 IAC 201.263, the source shall maintain records of continued operation in violation of the applicable requirements during malfunction or breakdown shall include at a minimum:

- i. A malfunction breakdown plan that includes the following at a minimum:
  - A. Estimates of typical emissions during malfunction or breakdown.
  - B. Reasonable steps that will be taken to minimize emissions, duration, and frequency of malfunction or breakdown.
- ii. Date and duration of the malfunction or breakdown.
- iii. A detailed explanation of the malfunction or breakdown.
- iv. An explanation why the emission unit(s) continued operation.
- v. The measures used to reduce the quantity of emissions (specifically noting the operational methods followed in Condition 7.4.(a)(iv)) and the duration of the event.
- vi. The duration of time at which the emission units operated under the operational procedures, as listed in Condition 7.4(a)(iv).
- vii. The steps taken to prevent similar malfunctions or breakdowns and reduce their frequency and severity.
- viii. An explanation of whether emissions during malfunction or breakdown were above typical emissions in the malfunction or breakdown procedures and whether emissions exceeded any applicable requirements.

**c. Monitoring - Reporting**

Pursuant to Sections 39.5(7)(b) and (f) of the Act and 35 IAC 201.263, the source shall provide the following notification and reports to the IEPA, Compliance Section and Regional Field Office (addresses are included in Attachment 3) concerning continued operation in violation of the applicable requirements during malfunction or breakdown:

i. Prompt Reporting

When continued operation in violation of an applicable emission standard(s) has occurred during malfunction or breakdown:

- A. The source shall notify the IEPA's regional office by telephone as soon as possible during normal working hours, but no later than three (3) days, upon the occurrence of noncompliance due to malfunction or breakdown.
- B. Upon achievement of compliance, the source shall give a written follow-up notice within 15 days to the IEPA, Air Compliance Section and Regional Field Office, providing a detailed explanation of the event, an explanation why continued operation was necessary, the length of time during which operation

continued under such conditions, the measures taken by the source to minimize and correct deficiencies with chronology, and when the repairs were completed or when the unit(s) was taken out of service.

- C. If compliance is not achieved within 5 working days of the occurrence, the source shall submit interim status reports to the IEPA, Air Compliance Section and Regional Field Office, within 5 days of the occurrence and every 14 days thereafter, until compliance is achieved. These interim reports shall provide a brief explanation of the nature of the malfunction or breakdown, corrective actions accomplished to date, actions anticipated to occur with schedule, and the expected date on which repairs will be complete or the emission unit(s) will be taken out of service.

ii. Semiannual Reporting

As part of the required Semiannual Monitoring Reports, the source shall submit a semiannual malfunction breakdown report including the following at a minimum:

- A. A listing of all malfunctions and breakdowns, in chronological order, that includes: the date, time, and duration of each incident; and identity of the affected operation(s) involved in the incident.
- B. Dates of the notices and reports required by Prompt Reporting requirements of 3(i)(A) above.
- C. The aggregate duration of all incidents during the reporting period.
- D. If there have been no such incidents during the reporting period, this shall be stated in the report.

**5. Compliance Assurance Monitoring (CAM) Requirements**

**a. CAM Provisions**

i. Proper Maintenance

Pursuant to 40 CFR 64.7(b), at all times, the source shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

ii. Continued Operation

Pursuant to 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the source shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit (PSEU) is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The source shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

iii. Response to Excursions or Exceedances

A. Pursuant to 40 CFR 64.7(d)(1), upon detecting an excursion or exceedance, the source shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

B. Pursuant to 40 CFR 64.7(d)(2), determination of whether the source has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device.

**b. Monitoring - Monitoring**

Pursuant to 40 CFR 64.7(a), the source shall comply with the monitoring requirements of the CAM Plans as described in 7.5(e) below, pursuant to 40 CFR Part 64 as submitted in the source's CAM plan application.

**c. Monitoring - Recordkeeping**

Pursuant to 40 CFR 64.9(b)(1), the source shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information related to the monitoring requirements established for CAM.

**d. Monitoring - Reporting**

Pursuant to Sections 39.5(7)(b) and (f) of the Act, the source shall submit the following reporting requirements:

**i. Semiannual Reporting**

As part of the required Semiannual Monitoring Reports, the source shall submit a CAM report including the following at a minimum:

- A. Summary information on the number, duration, and cause of excursions or exceedances, and the corrective actions taken pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(i).
- B. Summary information on the number, duration, and cause for monitoring equipment downtime incidents, other than downtime associated with calibration checks pursuant to 40 CFR 64.6(c)(3) and 64.9(a)(2)(ii).

**e. CAM Plans**

The following tables contain the CAM Plans in this CAAPP permit:

Table	Emission Unit Section	PSEU Designation	Pollutant
7.5.1	4.2	Kiln 1	VOM
7.5.2	4.2	Kiln 1	PM
7.5.3	4.2	Kiln 2	VOM
7.5.4	4.2	Kiln 2	PM
7.5.5	4.2	Cooler 1	PM
7.5.6	4.2	Cooler 2	PM

**Table 7.5.1 - CAM Plan**

Emission Unit Section:	4.2	
PSEU Designation:	Kiln 1	
Pollutant:	VOM	
Indicators:	#1) Pyroscrubber No. 1 Inlet Temperature	#2)
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Inlet Thermocouple	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Minimum of 1,800°F	
Quality Improvement Plan (QIP) Threshold Levels:	Accumulation of exceedances or excursions exceeding 5% duration of unit's operating time	
<b>General Criteria</b>		
The Specifications for Obtaining Representative Data:	Thermocouple on inlet of Pyroscrubber, installed per manufacture's specifications	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Manufacture's specifications for installation, calibration, and start-up operation	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Calibration of thermocouple per manufacture's specifications	
The Monitoring Frequency:	Minimum of four or more data values equally spaced over each hour	
The Data Collection Procedures That Will Be Used:	Temperature logged via facility's process control system	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Three hour average, when in operation	

**Table 7.5.2 - CAM Plan**

Emission Unit Section:	4.2	
PSEU Designation:	Kiln 1	
Pollutant:	PM	
Indicators:	#1) Pyroscrubber No. 1 Inlet Temperature	#2)
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Inlet Thermocouple	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Minimum of 1,800°F	
Quality Improvement Plan (QIP) Threshold Levels:	Accumulation of exceedances or excursions exceeding 5% duration of unit's operating time	
<b>General Criteria</b>		
The Specifications for Obtaining Representative Data:	Thermocouple on inlet of Pyroscrubber, installed per manufacture's specifications	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Manufacture's specifications for installation, calibration, and start-up operation	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Calibration of thermocouple per manufacture's specifications	
The Monitoring Frequency:	Minimum of four or more data values equally spaced over each hour	
The Data Collection Procedures That Will Be Used:	Temperature logged via facility's process control system	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Three hour average, when in operation	

**Table 7.5.3 - CAM Plan**

Emission Unit Section:	4.2	
PSEU Designation:	Kiln 2	
Pollutant:	VOM	
Indicators:	#1) Pyroscrubber No. 2 Inlet Temperature	#2)
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Inlet Thermocouple	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Minimum of 1,800°F	
Quality Improvement Plan (QIP) Threshold Levels:	Accumulation of exceedances or excursions exceeding 5% duration of unit's operating time	
<b>General Criteria</b>		
The Specifications for Obtaining Representative Data:	Thermocouple on inlet of Pyroscrubber, installed per manufacture's specifications	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Manufacture's specifications for installation, calibration, and start-up operation	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Calibration of thermocouple per manufacture's specifications	
The Monitoring Frequency:	Minimum of four or more data values equally spaced over each hour	
The Data Collection Procedures That Will Be Used:	Temperature logged via facility's process control system	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Three hour average, when in operation	

**Table 7.5.4 - CAM Plan**

Emission Unit Section:	4.2	
PSEU Designation:	Kiln 2	
Pollutant:	PM	
Indicators:	#1) Pyroscrubber No. 2 Inlet Temperature	#2)
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Inlet Thermocouple	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Minimum of 1,800°F	
Quality Improvement Plan (QIP) Threshold Levels:	Accumulation of exceedances or excursions exceeding 5% duration of unit's operating time	
<b>General Criteria</b>		
The Specifications for Obtaining Representative Data:	Thermocouple on inlet of Pyroscrubber, installed per manufacture's specifications	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Manufacture's specifications for installation, calibration, and start-up operation	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Calibration of thermocouple per manufacture's specifications	
The Monitoring Frequency:	Minimum of four or more data values equally spaced over each hour	
The Data Collection Procedures That Will Be Used:	Temperature logged via facility's process control system	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Three hour average, when in operation	

**Table 7.5.5 - CAM Plan**

Emission Unit Section:	4.2
PSEU Designation:	Rotary Cooler 1
Pollutant:	PM

Indicators:	#1) Baghouse No.1 Pressure Drop	#
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Pressure Drop Gauge	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Minimum pressure drop of 2" H <sub>2</sub> O, Maximum pressure drop of 8" of H <sub>2</sub> O	
Quality Improvement Plan (QIP) Threshold Levels:	Accumulation of exceedances or excursions exceeding 5% duration of the unit's operating time.	
<b>Performance Criteria</b>		
The Specifications for Obtaining Representative Data:	Pressure gauge across Baghouse, installed per manufacture's specifications	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Manufacture's specifications for installations, calibration, and start-up operation	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Calibration of pressure gauge per manufacture's specifications	
The Monitoring Frequency:	Minimum of four or more data values equally spaced over each hour	
The Data Collection Procedures That Will Be Used:	Pressure Drop logged via facility's process control system	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Three hour average, when in operation	

**Table 7.5.6 - CAM Plan**

Emission Unit Section:	4.2
PSEU Designation:	Rotary Cooler 2
Pollutant:	PM

Indicators:	#1) Baghouse No.2 Pressure Drop	#
<b>General Criteria</b>		
The Monitoring Approach Used to Measure the Indicators:	Pressure Drop Gauge	
The Indicator Range Which Provides a Reasonable Assurance of Compliance:	Minimum pressure drop of 2" H <sub>2</sub> O, Maximum pressure drop of 8" of H <sub>2</sub> O	
Quality Improvement Plan (QIP) Threshold Levels:	Accumulation of exceedances or excursions exceeding 5% duration of the unit's operating time.	
<b>Performance Criteria</b>		
The Specifications for Obtaining Representative Data:	Pressure gauge across Baghouse, installed per manufacture's specifications	
Verification Procedures to Confirm the Operational Status of the Monitoring:	Manufacture's specifications for installations, calibration, and start-up operation	
Quality Assurance and Quality Control (QA/QC) Practices that Ensure the Validity of the Data:	Calibration of pressure gauge per manufacture's specifications	
The Monitoring Frequency:	Minimum of four or more data values equally spaced over each hour	
The Data Collection Procedures That Will Be Used:	Pressure Drop logged via facility's process control system	
The Data Averaging Period For Determining Whether an Excursion or Exceedance Has Occurred:	Three hour average, when in operation	

## Section 8 - State Only Requirements

### 1. Permitted Emissions for Fees

Emission limitations are not set for this source for the purpose of permit fees. The Permittee shall be required to pay the maximum fee, pursuant to Section 39.5(18)(a)(ii)(A) of the Act.

## Attachment 1 - List of Emission Units at This Source

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Green Coke Screening	The Coke passes the green coke screening operation when it is unloaded and prior to entering the green coke crusher.
4.1	Green Coke Crushing	Green coke crushing uses a single roller crusher to reduce the size of the oversized coke, or the coke that is larger than 4 inches. The crusher is used to prepare the oversized coke for the kilns.
4.1	Green Coke Stacking	Green coke stacking uses an enclosed conveyor to transport excess properly sized coke to storage piles, where the stockpiled green coke is eventually reclaimed and conveyed to the green coke storage bins. The conveyor essentially "stacks" or piles the green coke.
4.1	Green Coke Conveying	Green coke conveying uses an enclosed conveyor to transport the green coke from the green coke crusher or the stockpiles to the green coke feed bins.
4.1	Green Coke Feed Bins	The green coke feed bins are the final storage place for green coke that is prepared and ready to enter the kilns.
4.1	Calcined Coke Conveying	Calcined coke exits one of the rotary coolers and is transferred using an oscillating covered conveyor to an elevator. The elevators take the calcined coke that was conveyed from the rotary cooler, and they load it into one of four overhead calcined coke storage bins.
4.1	Calcined Coke Storage Bins	There are four overhead calcined coke storage bins at the source. Two of the bins use bin vent filters to reduce PM emissions. All of the bins use good operating practices to minimize emissions. The overhead storage bins hold the finished product to eventually be unloaded.
4.1	Calcined Coke Railcar Load-out	The calcined coke leaves the overhead calcined coke storage bins via load-out spouts. The finished product is loaded into railcars for distribution to commercial markets. The calcined coke railcar load-out uses a heavy naphthlenic petroleum distillate, referred to as dedust oil, to control the PM emissions during railcar loading.

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.2	Petroleum Coke Calcining Line 1 and Petroleum Coke Calcining Line 2	Petroleum Coke Calcining Lines 1 and 2 consist of a rotary kiln, a pyroscrubber, a rotary cooler, and a baghouse. The kiln for each line can process 28 T/hr of green coke feed. The calcining process reduces VOM and moisture content of the green petroleum coke and chemically reforms the carbon content of the material to produce a final product, referred to as calcined coke. Calcined coke is a high-purity carbon compound used primarily by the aluminum and steel industries. Natural gas is used during startup of the kilns to reach optimum operating temperature (about 2,400°F) and simultaneously during operation to maintain the optimum operation temperature. The combustion of VOM from the green coke feed and the consumption of green coke provide the primary source of heat for the calcining process. The heating process consumes approximately 20% of the green coke feed, with the remaining material forming the final product, calcined coke.
4.3	Fugitive Dust	Emissions caused by moving vehicles that creates particulate matter (road dust) emissions on paved and unpaved roadways. Particulate Matter is also emitted from loading/unloading operations and storage piles at the source. Emissions of fugitive dust from storage piles at the facility are controlled by the quality and moisture content of materials as received and application of dust suppressants if needed to prevent emissions.
4.4	Gasoline Storage Tank	The gasoline storage tank is a 250 gallon tank used to store gasoline for onsite vehicle fueling at the source.
4.4	Dedust Oil Storage Tank	The dedust oil storage tank is a 15,000 gallon tank used to store a desust oil used at the source to limit PM emissions associated with the calcined coke load-out operation.

## Attachment 2 - Acronyms and Abbreviations

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
BACT	Best Available Control Technology
BAT	Best Available Technology
BTU	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EAF	Electric arc furnace
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
HP	Horsepower
hr	Hour
H <sub>2</sub> S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
KW	Kilowatts
LAER	Lowest Achievable Emission Rate
lb	Pound

Rain CII Carbon LLC  
I.D. No.: 033025AAJ  
Permit No.: 95120092

Date Received: 12/6/2007  
Date Issued: TBD

m	Meter
MACT	Maximum Achievable Control Technology
mm	Million
mon	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM <sub>2.5</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

## Attachment 3 - Contact and Reporting Addresses

<p style="text-align: center;">IEPA Compliance Section</p> <p style="text-align: center;">IEPA Stack Test Specialist</p> <p style="text-align: center;">IEPA Air Quality Planning Section</p> <p style="text-align: center;">IEPA Air Regional Field Operations Regional Office #3</p> <p style="text-align: center;">IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance &amp; Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, IL 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276</p> <p>Phone No.: 217/524-4343</p> <p>Illinois EPA, Bureau of Air Regional Office #3 2009 Mall Street Collinsville, IL 62234</p> <p>Phone No.: 618/346-5120</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, IL 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p style="text-align: center;">USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, IL 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 4 - Example Certification by a Responsible Official

<b>SIGNATURE BLOCK</b>	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Rain CII Carbon LLC  
I.D. No.: 033025AAJ  
Permit No.: 95120092

Date Received: 12/6/2007  
Date Issued: TBD