

217/782-2113

"RENEWAL"
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Argo Terminal Company
Attn: Terry Kolacki, Plant Manager
Post Office Box 361
Argo, Illinois 60501

I.D. No.: 031808AAD
Application No.: 95080098

Date Received: December 16, 2003
Date Issued: September 17, 2007
Expiration Date¹: September 17, 2012

Operation of: Bulk Chemical Storage Terminal, Argo Terminal Company
Source Location: 8800 West 71st Street, Argo, Cook County, 60501
Responsible Official: Terry Kolacki, Plant Manager

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

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

Edwin C. Bakowski, P.E.
Acting Manager, Permit Section
Division of Air Pollution Control

ECB:MED:psj

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

1 Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 INTRODUCTION

1.1 Source Identification

Argo Terminal Company
8800 West 71st Street
Argo, Illinois 60501
773/735-0586

Illinois EPA I.D. No.: 031808AAD
Standard Industrial Classification Code: 5171, Petroleum Bulk Stations

1.2 Owner/Parent Company

Great Lakes Synergy Corporation
723 West Algonquin Road
Arlington Heights, Illinois 60006

1.3 Operator

Argo Terminal Company
8800 West 71st Street
Argo, Illinois 60501

Terry Kolacki, Plant Manager
773/735-0586

1.4 Source Description

Argo Terminal Company is a storage facility for chemical products. Emission units at the site consist of several chemical storage tanks and tank truck filling equipment. Emissions from the source are limited by work practices, submerged filling and the floating roof tanks installed on some of the tanks.

Other emission sources include a tanker truck loading/unloading stations, fugitives from leaking components, and a natural gas fired boiler with distillate fuel backup.

Note: This narrative description is for informational purposes only and is not enforceable.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations there under. These programs include PSD and MSSCAM, and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page

of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

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
ASTM	American Society for Testing and Materials
ATU	Allotment Trading Unit
BACT	Best Available Control Technology
BAT	Best Available Technology
bbl	Barrel
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft ³	cubic foot
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
°K	degrees Kelvin
kPa	kilo-Pascal
LAER	Lowest Achievable Emission Rate
lb	pound
m	meter
MACT	Maximum Achievable Control Technology
mmBtu	Million Btus
mmBtu/hr	Million Btus per hour
MSSCAM	Major Stationary Sources Construction and Modification (35 IAC 203, New Source Review for non-attainment areas)
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
psia	pounds per square inch absolute

PSD	Prevention of Significant Deterioration (40 CFR 52.21, New Source Review for attainment areas)
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
t	ton
TANKS	USEPA Emission Estimating Program for Storage Tanks
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
wt.	weight
yr	year

3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Truck Cleaning Operation

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

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

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

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

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

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC

212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.2.3 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.
- 3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia at 70°F, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, or a vapor recovery system.
- 3.2.5 For each emission unit required to be included in determining applicability of 35 IAC 218 Subpart TT, total VOM emissions from insignificant activities (including storage and handling of formulations) in conjunction with the applicable emission units in Section 7 of this permit shall not equal or exceed 25 ton/yr.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Emission Control Equipment
Group 1	Fixed Roof Storage Tanks	Permanent Submerged Fill
Group 2	Fixed Roof Storage Tanks Built After July 23, 1984	Permanent Submerged Fill
Group 3	Internal Floating Roof Storage Tanks	Floating Roof with Primary and Secondary Seals
Group 4	Tanker Truck Loading/Unloading Stations	Submerged Fill
Group 5	Component Fugitive Emissions Piping, Valves, and Pumps used to Transfer Materials Between the Storage Tanks and at the Unloading Station	None
Group 6	Natural Gas Fired Boiler w/ Distillate Fuel Backup	None

See Section 7.0 and Attachment 3 for a listing of all tanks covered by this permit.

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment) and/or PM_{2.5} and attainment or unclassifiable for all other criteria pollutants (CO, lead, NO₂, ozone, PM_{2.5}, PM₁₀, SO₂).

5.3 Source-Wide Applicable Provisions and Regulations

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

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

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. 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 the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.
- c. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC Section 218.302, 218.303, and 218.304 and the following exception: If no odor nuisance exists the limitation of this 35 IAC Subpart G shall apply only to photochemically reactive material.

In regards to the above, "Photochemically reactive material" means any organic material with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified below or the composition of which exceeds any of the following individual percentage composition limitations. Whenever any photochemically reactive material or any constituent of any organic

material may be classified from its chemical structure into more than one of the above groups of organic materials, it shall be considered as a member of the most reactive group, that is, the group having the least allowable percent of the total organic materials [35 IAC 211.4690].

A combination of hydrocarbons, alcohols, aldehydes, esters, ethers or ketones having an olefinic or cyclo-olefinic types of unsaturation: 5 percent. This definition does not apply to perchloroethylene or trichloroethylene.

A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.

A combination of ethylbenzene, ketones having branched hydrocarbon structures or toluene: 20 percent.

5.3.3 Fugitive Particulate Matter Operating Program

- a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with the fugitive particulate matter operating program, submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph b below.
- b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].
- c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.3.4 Ozone Depleting Substances

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3.5 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 owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.6 Future Emission Standards

- a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).
- b. 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.

5.3.7 Episode Action Plan

- a. Pursuant to 35 IAC 244.141, 244.142, and 244.143, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144 and is incorporated by reference into this permit.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared by the Director of the Illinois EPA or his or her designated representative.
- c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.
- d. Any subsequent revisions of the plan shall also be sent to the Cook County Department of Environmental Control.

5.3.8 PM₁₀ Contingency Measure Plan

Should the actual annual source-wide emissions of PM₁₀ equal or exceed 15 tons, then the Permittee shall prepare and submit a contingency measure plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U. This permit may also have to be revised or reopened to address this regulation (see Condition 9.12.2).

5.4 Source-Wide Non-Applicability of Regulations of Concern

- 5.4.1. This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart Y: Gasoline Distribution; because the source does not load gasoline from storage tanks into delivery vessels (tank trucks) (See also Condition 5.5) [35 IAC 218.581 and 218.582].
- 5.4.2. This permit is issued based on the source not being subject to 40 CFR 60, Subpart XX – Standards of Performance for Bulk Gasoline Terminals; because the source is not a bulk gasoline terminal (See also Condition 5.5) [40 CFR 60.500].

- 5.4.3. This permit is issued based on the source not being subject to 40 CFR 61, Subpart J - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene; because the pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source are not in benzene service as defined in 40 CFR 61.111 (See also Condition 5.5) [40 CFR 61.110].
- 5.4.4. This permit is issued based on the source not being subject to 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources); because pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels at the source are not in volatile hazardous air pollutant service as defined in 40 CFR 61.241 (See also Condition 5.5) and because the source is not a major source of HAP emissions [40 CFR 61.240].
- 5.4.5. This permit is issued based on the source not being subject to 40 CFR 61, Subpart Y-National Emission Standard for Benzene Emissions from Benzene Storage Vessels or Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations; the source does not store or load out, into tank trucks, railcars, or marine vessels, VOL containing benzene meeting the applicability criteria of the referenced subparts (See also Condition 5.5) and because the source is not a major source of HAP emissions [40 CFR 61.270 and 61.300].
- 5.4.6. This permit is issued based on the source not being subject to 40 CFR 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations); because the source is not a bulk gasoline terminal as defined in 40 CFR 63.421. (See also Condition 5.5)
- 5.4.7. This permit is issued based on the source not being subject to 40 CFR 63, Subpart Y - National Emission Standards for Marine Tank Vessel Tank Loading Operations; because the source is not a marine terminal as defined in 40 CFR 63.561 and because the source is not a major source of HAP emissions [40 CFR 63.560].
- 5.4.8. This permit is issued based on the source not being subject to 40 CFR 63, Subpart OO - National Emission Standards for Tanks - Level 1; because the source is not applicable to any subpart of 40 CFR parts 60, 61, or 63 which references the use of 40 CFR 63, Subpart OO for air emission control and because the source is not a major source of HAP emissions [40 CFR 63.900].
- 5.4.9. This permit is issued based on the source not being subject to 40 CFR 63, Subpart EEEE - National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline); because the source is not a major source of HAP emissions [40 CFR 63.2334].

5.5 Source-Wide Control Requirements and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

- 5.5.1 The pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels, loading racks and storage tanks at the source shall not be used to process, store, unload or load any of the following:
 - a. Gasoline or any other petroleum distillate or petroleum distillate/alcohol blend that is used as a fuel for internal combustion engines.
 - b. VOL containing vinyl chloride or benzene in excess of 2 percent by weight.

It should be noted that these limits are imposed in order for the source to avoid applicability of the regulations listed in Section 5.4.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	119.77
Sulfur Dioxide (SO ₂)	33.24
Particulate Matter (PM)	1.93
Nitrogen Oxides (NO _x)	10.60
HAP, not included in VOM or PM	----
Total	165.54

5.6.2 Emissions of Hazardous Air Pollutants

Pursuant to Section 39.5(7)(a) of the Act, the emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly

basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.2 and 5.9.3, and 5.10.2.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for PSD, state rules for MSSCAM, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, 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:

- a. Testing by Owner or Operator: The Illinois EPA 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 Illinois EPA, at such reasonable times as may be specified by the Illinois EPA 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 Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].
- b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, 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 [35 IAC 201.282(b)].
- c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that is that this source is not a major source of HAPs, the following testing requirements are established:

- a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs, using the following methods and procedures shall be performed.
 - i. To determine the uncontrolled HAP emissions from storage tanks at the source, testing shall be conducted using methods that would be acceptable under the federal National Emission Standards for Pharmaceuticals Production, 40 CFR 63 Subpart GGG. Specifically, the testing procedures detailed at 40 CFR 63.1257(b) of the performance tests. The Permittee shall test those tanks that make the largest contributions to individual and total HAP emissions. Likewise, testing shall be conducted under conditions that produce the under conditions that greatest amount of HAP emissions.
 - ii. To determine the uncontrolled HAP emissions from loading stations at the source, testing shall be conducted using methods that would be acceptable under the federal National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR 63 Subpart G. Specifically, the testing procedures detailed at 40 CFR 63.128 of the performance tests. The Permittee shall test all of the affected loading stations.
- b.
 - i. The Illinois EPA may require the Permittee to test the HAP content of the organic liquids transferred and stored at the source using EPA Method 311 or other method approved by the Illinois EPA. If the results of the EPA Method 311 (or any other approved method) are different from the HAP content determined by another means, the EPA Method 311 (or approved method) results will govern.

For tracking purposes, the Permittee may use other means, such as material safety data sheets (MSDS), or certified product data sheets, to determine the HAP content of the organic liquid. If the method used to determine the HAP content provides HAP content ranges, the Permittee must use the upper end of each

HAP content range in determining the total HAP content of the organic liquid.

- ii. Organic liquid HAP content testing may be conducted by the supplier of the HAP-containing material.
- c. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.
- d. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

5.8.1 Monitoring VOL Operations

- a. Available data on the storage temperature may be used to determine the maximum true vapor pressure [35 IAC 218.128(b)].
 - i. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service [35 IAC 218.128(b)(1)].
 - ii. For other liquids, the vapor pressure [35 IAC 218.128(b)(2)]:
 - A. Determined by ASTM Method D2879-83, incorporated by reference at 35 IAC 218.112(a)(1) [35 IAC 218.128(b)(2)(A)];
 - B. Measured by an appropriate method approved by the Agency and USEPA [35 IAC 218.128(b)(2)(B)]; or
 - C. Calculated by an appropriate method approved by the Agency and USEPA [35 IAC 218.128(b)(2)(C)].
- b. The owner or operator of each vessel storing a mixture of indeterminate or variable composition shall be subject to the following [35 IAC 218.128(c)]:

- i. Prior to the initial filling of the vessel, the maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in Condition 5.8.1(b) above and 35 IAC 218.128(b) [35 IAC 218.128(c)(1)].
- ii. For vessels in which the vapor pressure of the anticipated liquid composition is 0.5 psia or greater but less than 0.75 psia, an initial physical test of the vapor pressure is required; a physical test at least once every 6 months thereafter is required as determined by the following methods [35 IAC 218.128(c)(2)]:
 - A. ASTM Method D2879-83, incorporated by reference at 35 IAC 218.112(a)(1) [35 IAC 218.128(c)(2)(A)];
 - B. ASTM Method D323-82, incorporated by reference at 35 IAC 218.112(a)(25) [35 IAC 218.128(c)(2)(B)]; or
 - C. As measured by an appropriate method approved by the Agency [35 IAC 218.128(c)(2)(C)].
- c. In regard to the above, testing performed by an outside party (i.e., suppliers, manufactures, etc.) is acceptable.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 General Records for Storage Tanks

- a. Pursuant to Condition 5.11, the Permittee shall maintain a log identifying which unit-specific condition (Conditions 7.1, 7.2 or 7.3 of this permit) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.
- b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m³ (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to

date for each tank at the source and be retained until the tank is removed from the source.

- i. The date* on which construction of the tank was commenced, with a copy of supporting documentation;
- ii. The date(s)* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, were commenced on the tank, if applicable;
- iii. The dimensions of the tank and an analysis of capacity [35 IAC 218.129(f) and 40 CFR 60.116b(b)].

* If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

c. The Permittee shall maintain the following general operating records:

- i. For each storage vessel, a record of the VOL storage, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period [35 IAC 218.129(g)].
- ii. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;
- iii. The Permittee shall keep an MSDS or equivalent document showing the formulation of each organic liquid stored at the source, including content of all HAPs. These formulation sheets may be used to make the calculation of VOM and HAP emissions required by Condition 5.9.1 and 5.9.4. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 - 3%) then the highest value shall be used. Copies of any other supporting documentation for VOM and/or HAP vapor weight percent shall be maintained and retained;
- iv. A current analysis of the tank or tanks in each group that would have the greatest emissions from storage of various liquids in the event that the Permittee does not choose to keep throughput records by individual tank, to identify the tank that should be assumed for emission calculations; and
- v. The Permittee shall keep a record of the applicability determination for any future applicable rule (See Condition 5.3.6) at the source for a period of five years after the determination. This determination shall include a detailed analysis that

demonstrates why the Permittee believes the source is or is not subject to the regulation.

- d. The Permittee shall maintain records of the following items on a monthly basis for the previous month:
- i. The throughput of each organic liquid through each tank or group of tanks if based on 5.9.2(c)(iv);
 - ii. The organic material (OM) emissions attributable to each organic liquid stored at the source, tons/month, with supporting calculations, calculated utilizing an approved USEPA methodology, such as the TANKS program;
 - iii. For each HAP identified as present, the total emissions of the individual HAP for all emission units at the source, tons/month, with supporting calculations; and
 - iv. Total emissions of each individual HAP, and combined HAPs from the source, tons/month, with supporting calculations.

It should be noted, if applicable, that the results of the testing required in Condition 5.7.2 must be used in place of the emission estimation procedures required above and in Condition 5.12.

5.9.3 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the storage tanks at the source. These records shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

- a. The color of each storage tank;
- b. The condition of each storage tank; and
- c. The type and number of fittings.

5.9.4 Records for HAP Emissions

- a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

- b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.

5.9.5 Records for Source-Wide Operating Scenarios

- a. If any storage tank identified in this permit as storing VPL, changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F as provided for in Condition 5.11, the Permittee shall maintain a log identifying the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.

5.9.6 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.10.3 General Reporting for Tanks

The owner or operator of each storage vessel with a design capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia shall notify the Illinois EPA Compliance Section (See Condition 8.6.4) within 30 days when the maximum true vapor pressure of the liquid exceeds 0.75 psia [35 IAC 218.128(a)].

5.10.4 Annual Reporting of HAP Emissions

- a. The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emission Report (Condition 9.7);
- b. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all); and
- c. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding year through January, for the month of February, the emissions from March of the preceding calendar year through February, 12 months in all).

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Pursuant to Section 39.5(7)(1)(i) of the Act, the Permittee is authorized to make the following physical or operational changes without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Storage Tanks

- a. The Permittee is authorized to store materials with a vapor pressure less than 0.5 psia at 70°, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any storage tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.0 of this permit applicable to such tank based on the storage of VPL

shall no longer apply. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of an emission unit, as defined in 35 IAC 201.102:

- b. Upon resuming storage of VPL in such a tank, the applicable unit-specific conditions of Section 7.0 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct applicable inspection of the tank for storage of VPL.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

- a. For the purpose of estimating VOM and HAP emissions from the storage tanks, the current version of the TANKS program is acceptable.
- b. For the purpose of estimating fugitive VOM emissions from components at the facility, the compliance procedures in Condition 7.5 shall be used.
- c. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

6.1 Emissions Reduction Market System (ERMS)

6.1.1 Description of ERMS

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

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

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

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

6.1.2 Applicability

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

6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.1.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.1.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.1.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.1.4 Market Transactions

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

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

6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.1.3, it shall provide emissions excursion compensation in accordance with the following:

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

6.1.6 Quantification of Seasonal VOM Emissions

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

No exceptions

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

6.1.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data is not

yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

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

6.1.8 Allotment of ATUs to the Source

- a.
 - i. The allotment of ATUs to this source is 147 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 16.6785 tons per season.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.1.10 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

- b. Contingent Allotments for New or Modified Emission Units

None

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
 - ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and
 - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.1.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.1.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.1.10 Exclusions from Further Reductions

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

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

None

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

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

None

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Group 1 - Fixed Roof Storage Tanks

7.1.1 Description

The Permittee operates conical and vertical fixed roof storage tanks to store various organic liquids. Permanent submerged loading is used on these tanks, minimizing turbulence and evaporation of VOM during loading.

Note: This narrative description is for informational purposes only and is not enforceable.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
A-1	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-3	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-4	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-6	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-8	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-9	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-10	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-12	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-14	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-18	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-19	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-20	Fixed Roof Tank	Permanent Submerged Loading Pipe
A-21	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-1	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-2	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-3	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-4	Fixed Roof Tank	Permanent Submerged Loading Pipe

Storage Tank	Description	Emission Control Equipment
AS-5	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-6	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-7	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-8	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-9	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-10	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-11	Fixed Roof Tank	Permanent Submerged Loading Pipe
AS-16	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-A	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-B	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-C	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-D	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-E	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-F	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-G	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-H	Fixed Roof Tank	Permanent Submerged Loading Pipe
AH10-I	Fixed Roof Tank	Permanent Submerged Loading Pipe
BM-2	Fixed Roof Tank	Permanent Submerged Loading Pipe
BM-3	Fixed Roof Tank	Permanent Submerged Loading Pipe
BM-4	Fixed Roof Tank	Permanent Submerged Loading Pipe
BM-5	Fixed Roof Tank	Permanent Submerged Loading Pipe
Dock	Fixed Roof Tank	Permanent Submerged Loading Pipe
T/C B	Fixed Roof Tank	Permanent Submerged Loading Pipe
T/C G	Fixed Roof Tank	Permanent Submerged Loading Pipe
Diesel	Fixed Roof Tank	Permanent Submerged Loading Pipe

Storage Tank	Description	Emission Control Equipment
Dock 2	Fixed Roof Tank	Permanent Submerged Loading Pipe
Blend Tank A	Fixed Roof Tank	Permanent Submerged Loading Pipe
Blend Tank B	Fixed Roof Tank	Permanent Submerged Loading Pipe

Note: Attachment 3 provides a summary of affected storage tanks status (i.e., date of construction/modification, capacity, internal floating roof seals,...etc.)

7.1.3 Applicable Provisions and Regulations

- a. The "affected emission units" for the purpose of these unit-specific conditions, are the organic liquid storage tanks described in Conditions 7.1.1 and 7.1.2.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304, and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 218.301]. (See Condition 5.3.2(c))
- c. As applicable;
 - i. The limitations of 35 IAC 218.120 shall apply to all storage containers of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gal) capacity or greater, except to vessels as provided below [35 IAC 218.119]:
 - A. Vessels with a capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true pressure of less than 0.5 psia;
 - B. Vessels of coke oven by-product plants;
 - C. Pressure vessels designed to operate in excess of 29.4 psia and without emissions to the atmosphere;
 - D. Vessels permanently attached to mobile vehicles such as trucks, rail cars, barges, or ships;
 - E. Vessels storing petroleum liquids; or
 - F. Vessels used to store beverage alcohol.

- G. Vessels with storage capacity less than 40,000 gallons must comply with 35 IAC 218.129(f) (See Condition 7.1.9(c)).
- ii. Every owner or operator storing VOL in a vessel of 40,000 gallons or greater with a maximum true vapor pressure equal to 0.75 psia but less than 11.1 psia shall reduce VOM emissions from storage tanks, reservoirs, or other containers as required in 35 IAC 218.120 [35 IAC 218.120(a)].

7.1.4 Non-Applicability of Regulations of Concern

- a. The affected tanks are not subject to the NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 or for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60 Subparts K and Ka, respectively, because the affected tanks either have a storage capacity less than 151,416 l (40,000 gal) and/or because they were constructed prior to the applicability dates in the NSPS (See Attachment 3) [40 CFR 60.110(a) and 60.110a(a)].
- b. The affected tanks are not subject to the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60 Subpart Kb, because the affected tanks either has a capacity less than 75 cubic meters (19,812 gallons) and/or because they were constructed prior to the applicability dates in the NSPS (See Attachment 3) [40 CFR 60.110b(a)].
- c. The affected tanks are not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, or 35 IAC 218.123, Petroleum Liquid Storage Tanks, because the petroleum liquid stored in the tanks do meet the definition for volatile petroleum liquid (See Condition 7.1.6) [35 IAC 218.122(a)(6)].

“Volatile petroleum liquid” means any petroleum liquid with a true vapor pressure that is greater than 1.5 psia (78 millimeters of mercury) at standard conditions [35 IAC 211.7170].
- d. An affected tank is not subject to the requirements of 35 IAC 218.122, Loading Operations, if no odor nuisance exists the limitations of 35 IAC 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) (See Condition 7.1.6) [35 IAC 218.122(c)].

- e. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tanks are subject to 35 IAC 218, Subpart B [35 IAC 218.940(a) and (b) and 218.980(a) and (b)].
- f. The affected tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.1.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected storage tanks. However, there are requirements for source-wide control requirements and work practices set forth in Condition 5.5.

7.1.6 Production and Emission Limitations

Pursuant to Section 39.5(7) of the Act, the Permittee shall not store any VOL with a vapor pressure in excess of 0.75 psia in any affected storage tank with a storage capacity greater than 40,000 gallons.

7.1.7 Testing Requirements

Testing requirements are not set for the affected storage tanks. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.1.8 Monitoring Requirements

Monitoring requirements are not set for the affected storage tanks. However, there are provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected emission units to demonstrate compliance with Conditions 5.6.1, 7.1.3, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel [35 IAC 218.129(f)].

The storage tank capacity records required by Condition 5.9 (requiring records of tank dimensions and an analysis of the capacity of the storage vessel) are acceptable pursuant to the requirements of 35 IAC 218.129(f).

- b. Records of the VOL storage, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for each storage vessel subject to the requirements in 35 IAC 218.120 with a design capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true vapor pressure greater than or equal to 0.5 psia but less than 0.75 psia [35 IAC 218.129(g)].
- c. Records or log of the compliance status of each tank. These include but are not limited to the following:
 - i. A listing of whether a specific storage tank is subject to or exempt from the requirements in Conditions 5.3.2(c) and 7.1.3(a) and (c); and
 - ii. Records of any exceedances of the limit in Condition 7.1.6.

7.1.10 Reporting Requirements

a. Reporting of Deviations

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

- i. Operation of the affected emission units in excess of the limits specified in Condition 7.1.3 and/or 7.1.6 within 30 days of such occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

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

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

7.1.12 Compliance Procedures

- a. Compliance with Condition 7.1.3(b) and (c) is based upon the maximum true vapor pressure of the VOL stored in the affected tanks being limited to less than 0.75 psia (See Condition 7.1.6) and the source-wide monitoring,

recordkeeping, and reporting requirements in Conditions 5.8, 5.9, and 5.10, respectively, and the recordkeeping and reporting requirements in Conditions 7.1.9 and 7.1.10. In addition, a particular storage tank may also be exempt due to the current service, features, or other circumstances associated with the tank (See Conditions 5.3.2(c) and 7.1.3(b) and (c)).

- b. Emissions from each affected storage tank shall be determined through the use of the most current version of the TANKS program.
- c. For the purpose of estimating HAP emissions from equipment at the facility, the vapor weight percent (based on a 1992 USEPA survey or calculations based MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

7.2 Group 2 - Fixed Roof Storage Tanks built after July 23, 1984

7.2.1 Description

The Permittee operates fixed roof storage tanks to store various organic liquids collected during spill cleanup operations. Permanent submerged loading is used at these tanks, minimizing turbulence and evaporation of VOM during loading.

Note: This narrative description is for informational purposes only and is not enforceable.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
SP-1	Fixed Roof Tank	Permanent Submerged Loading Pipe
SP-2	Fixed Roof Tank	Permanent Submerged Loading Pipe

Note: Attachment 3 provides a summary of affected storage tanks status (i.e., date of construction/modification, capacity, internal floating roof seals,...etc.)

7.2.3 Applicable Provisions and Regulations

- a. The "affected emission units" for the purpose of these unit-specific conditions, are the organic liquid storage tanks described in Conditions 7.2.1 and 7.2.2.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304, and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 218.301]. (See Condition 5.3.2(c))
- c. The "affected emission units" are subject to the recordkeeping requirements of 35 IAC 218.129(f) [35 IAC 218.119(g)].

7.2.4 Non-Applicability of Regulations of Concern

- a. The affected tanks are not subject to the NSPS for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 or for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60 Subparts K and Ka, respectively, because the affected tanks have a storage capacity less

than 151,416 l (40,000 gal) [40 CFR 60.110(a) and 60.110a(a)].

- b. The affected storage tanks are not subject to the requirements of 40 CFR 60 Subpart Kb because the subpart does not apply to storage vessels with a capacity greater than or equal to 75 m³ (19,813 gallons) but less than 151 m³ (40,000 gallons) storing a liquid with a maximum true vapor pressure less than 15.0 kPa (2.17 psia) [40 CFR 60.110b(b)].

It should be noted that the applicability requirements for this subpart were revised by USEPA at 68 FR 59333, Oct. 15, 2003.

- c. An affected tank is not subject to the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, because their storage capacity is less than 151,416 liters (40,000 gal) [35 IAC 218.120(a)].
- d. An affected tank is not subject to the requirements of 35 IAC 218.121, Storage Containers of VPL, because the petroleum liquid stored in the tank does meet the definition for volatile petroleum liquid [35 IAC 211.7170].
- e. An affected tank is not subject to the requirements of 35 IAC 218.122, Loading Operations, if no odor nuisance exists the limitations of 35 IAC 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) [35 IAC 218.122(c)].
- f. An affected tank is not subject to the requirements of 35 IAC 218.123, Petroleum Liquid Storage Tanks, because the petroleum liquid stored in the tank does meet the definition for volatile petroleum liquid [35 IAC 218.123(a)(6)].
- g. An affected tank is not subject to the requirements of 35 IAC Part 218, Subpart QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B [35 IAC 218.940(a) and (b) and 218.980(a) and (b)].
- h. The affected tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected emission units. However, there are requirements for source-wide control requirements and work practices set forth in Condition 5.5.

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected emission units are subject to the following:

- a. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall not store any organic material with a true vapor pressure of 0.75 psia or greater.

Compliance with this limit shall be based upon the recordkeeping requirements of Condition 7.2.9 [T1].

The above limitations were established in Permit 95080098, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

- b. Emissions from each affected storage tank shall not exceed the following limits:

	VOM
<u>(lb/hr)</u>	<u>(ton/year)</u>
0.1	0.44

These limits are based on the operational limits referenced in Condition 7.2.6(a), the recordkeeping requirements in Conditions 5.9 and 7.2.9 and the compliance procedures referenced in Conditions 5.12 and 7.2.12.

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

The above limitations were established in Construction Permit 94040043, pursuant to 35 IAC Part 203. This limit documents that the construction and/or modification addressed in the aforementioned permit was a natural minor increase and does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.2.7 Testing Requirements

Testing requirements are not set for the affected emission units. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected emission units. However, there are provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected emission units to demonstrate compliance with Conditions 5.6.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel [35 IAC 218.129(f)].

The storage tank capacity records required by Condition 5.9 (requiring records of tank dimensions and an analysis of the capacity of the storage vessel) are acceptable pursuant to the requirements of 35 IAC 218.129(f).

- b. Records or log of the compliance status of each tank. These include but are not limited to the following:
 - i. A listing of whether a specific storage tank is subject to or exempt from the requirements in Conditions 5.3.2(c) and 7.1.3(a) and (c); and
 - ii. Records of any exceedances of the limit in Condition 7.1.6.

7.2.10 Reporting Requirements

- a. Reporting of Deviations

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

- i. Operation of the affected emission units in excess of the limits specified in Conditions 7.2.3 and/or 7.2.6 within 30 days of such occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected emission units without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's

obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.

7.2.12 Compliance Procedures

a. Compliance with Condition 7.2.3(b) is based upon the maximum true vapor pressure of the VOL stored in the affected tanks being limited to less than 0.75 psia (See Condition 7.2.6) and the source-wide monitoring, recordkeeping, and reporting requirements in Conditions 5.8, 5.9, and 5.10, respectively, and the recordkeeping and reporting requirements in Conditions 7.2.9 and 7.2.10. In addition, a particular storage tank may also be exempt due to the current service, features, or other circumstances associated with the tank (See Conditions 5.3.2(c) and 7.2.3(b)).

b. Emissions from each affected storage tank shall be determined through the use of the most current version of the TANKS program.

Hourly emissions shall be determined by dividing annual emissions by 8,760 hours/year.

c. For the purpose of estimating HAP emissions from equipment at the facility, the vapor weight percent (based on a 1992 USEPA survey or calculations based MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable

7.3 Group 3 - Internal Floating Roof Storage Tanks

7.3.1 Description

The Permittee operates internal floating roof storage tank(s) to store various chemical products. The internal floating roofs are equipped with both a primary and secondary seal (See Attachment 3). Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

Note: This narrative description is for informational purposes only and is not enforceable.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Storage Tank	Description	Emission Control Equipment
A-2	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
A-5	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
A-7	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
A-11	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
A-13	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
A-22	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof
BM1	Internal Floating Roof Tank	Permanent Submerged Loading Pipe and Internal Floating Roof

Note: Attachment 3 provides a summary of affected storage tanks status (i.e., date of construction/modification, capacity, internal floating roof seals,...etc.)

7.3.3 Applicable Provisions and Regulations

- a. The "affected emission units" for the purpose of these unit-specific conditions, are the internal floating roof storage tank(s) described in Conditions 7.3.1 and 7.3.2.
- b. The "affected emission units" are subject to the control requirements of 35 IAC 218.120(a), 218.121, 218.122(b), and 218.123 that relies on a permanent submerged loading pipe

and internal floating roof for compliance. These limits are shown as follows:

- i. An affected storage tank is subject to the control requirements of 35 IAC 218.120 if it has a capacity greater than or equal to 40,000 gallons (151 m³) storing a VOL with a vapor pressure of 5.19 kPa (0.75 psia) or more but less than or equal to a maximum true vapor pressure of 76.52 kPa (11.1 psia) [35 IAC 218.119 and 218.120].
- ii. An affected storage tank is subject to the control requirements of 35 IAC 218.121 if it has a capacity greater than or equal to 40,000 gallons (151 m³) storing a VPL with a vapor pressure of 10.34 kPa (1.5 psia) or greater at 294.3°K (70°F). (Internal floating roof - 35 IAC 218.121(b)(1))

VPL ("Volatile petroleum liquid" means any petroleum liquid with a true vapor pressure that is greater than 1.5 psia (78 millimeters of mercury) at standard conditions [35 IAC 211.7170].

- iii. Unless exempted pursuant to 35 IAC 218.122(c), an affected storage tank is subject to the control requirements of 35 IAC 218.122 with a storage capacity of greater than 250 gallon is required to be equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA.

As of the date of issuance of this permit, see page one of the permit, the Illinois EPA has not approved any alternative control.

- iv. Unless exempted pursuant to 35 IAC 218.123(a), an affected storage tank that stores volatile petroleum liquid is subject to the control requirements of 35 IAC 218.123(b) [35 IAC 218.123].

The above referenced control requirements are shown in Condition 7.3.5.

- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304, and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 218.301]. (See Condition 5.3.2(c))

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected tanks are not subject to the NSPS for Storage Vessels for Petroleum Liquids for Which Construction,

Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 or for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60 Subparts K and Ka, respectively, because the affected tanks were constructed prior to the applicability dates in the NSPS [40 CFR 60.110(a) and 60.110a(a)].

- b. The affected emission units are not subject to the requirements of 40 CFR 60 Subpart Kb because the installation of the internal floating roof on the existing fixed roof tank, referenced in Construction Permit 95050163 and 00020098, is not considered to be a modification since the internal floating roof constitutes greater control for the vessel.
- c. The affected emission units are not subject the closed vent system and control device requirements in 35 IAC 218.120(b) because the affected emission units are prohibited from storing organic liquids with a maximum true vapor pressure greater than or equal to 11.1 psia [35 IAC 218.120(b)].
- d. The affected emission units are not subject to the requirements of 35 IAC Part 218, Subparts QQ and TT, because the affected tank is subject to 35 IAC 218, Subpart B [35 IAC 218.940(a) and (b) and 218.980(a) and (b)].
- e. The affected tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected tanks 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.

7.3.5 Control and Operational Requirements

- a. The maximum true vapor pressure of the organic liquids stored in the affected emission units shall not exceed 11.0 psia.

This limitation is being imposed in order to avoid applicability of 35 IAC 218.120(b) which states the following:

The owner or operator of each storage vessel with a design capacity equal to or greater than 40,000 gallons which contains VOL that, as stored, has a maximum true vapor pressure greater than or equal to 11.1 psia shall equip each storage vessel with a closed vent system and control device as specified in 35 IAC 218.120(a)(4) [35 IAC 218.120(b)].

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

Pursuant to the definition in 35 IAC 211.6470(b), "Submerged loading pipe" means, for purposes of 35 Ill. Adm. Code 218, any discharge pipe or nozzle which meets either of the following conditions:

- i. Where the tank is filled from the top, the end of the discharge pipe or nozzle must be totally submerged when the liquid level is 15 cm (6 in.) above the bottom of the tank [35 IAC 211.6470(b)(1)].
 - ii. Where the tank is filled from the side, the discharge pipe or nozzle must be totally submerged when the liquid level is 46 cm (18 in.) above the bottom of the tank [35 IAC 211.6470(b)(2)].
- c. Each affected emission unit shall be equipped with an internal floating roof that meets the following specifications [35 IAC 218.120(a)(1)]:
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible [35 IAC 218.120(a)(1)(A)].
 - ii. Each affected emission unit in VOL service shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof [35 IAC 218(a)(1)(B)]:
 - A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank [35 IAC 218.120(a)(1)(B)(i)];
 - B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal

floating roof. The lower seal may be vapor-mounted, but both must be continuous [35 IAC 218.120(a)(1)(B)(ii)]; or

- C. A mechanical shoe seal, which is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof [35 IAC 218.120(a)(1)(B)(iii)].
- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface [35 IAC 218.120(a)(1)(C)].
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use [35 IAC 218.120(a)(1)(D)].
- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports [35 IAC 218.120(a)(1)(E)].
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting [35 IAC 218.120(a)(1)(F)].
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening [35 IAC 218.120(a)(1)(G)].
- viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover [35 IAC 218.120(a)(1)(H)].
- d. Subject to 35 IAC 218.123(a), no affected emission unit in VPL service shall cause or allow the storage of any volatile petroleum liquid in the tank unless [35 IAC 218.123(b)]:

- i. The tank is equipped with one of the vapor loss control devices specified in 35 IAC 218.121(b) (See below) [35 IAC 218.123(b)(1)];

In this case compliance is based upon the affected emission units using internal floating roof tanks, as per 35 IAC 218.121(b)(1), and the limitation on maximum true vapor pressure in Condition 7.3.5(a).

A floating roof which rests on the surface of the VPL and is equipped with a closure seal or seals between the roof edge and the tank wall. No person shall cause or allow the emission of air contaminants into the atmosphere from any gauging or sampling devices attached to such tanks, except during sampling or maintenance operations [35 IAC 218.121(b)(1)].

- ii. There are no visible holes, tears or other defects in the seal or any seal fabric or material of any floating roof [35 IAC 218.123(b)(2)];
- iii. All openings of any floating roof deck, except stub drains, are equipped with covers, lids or seals such that [35 IAC 218.123(b)(3)]:
 - A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 218.123(b)(3)(A)];
 - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 218.123(b)(3)(B)]; and
 - C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting [35 IAC 218.123(b)(3)(C)].

7.3.6 Production and Emission Limitations

Production and emission limitations are not set for the affected emission units. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.3.7 Testing Requirements

Testing requirements are not set for the affected emission units. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.3.8 Monitoring and Inspection Requirements

- a. For each affected storage tank, used to store petroleum liquids (See Condition 7.3.3), the Permittee shall verify compliance with the applicable control and operating requirements of 35 IAC 218.123 by visually inspecting the applicable storage tank's floating roof seals of each affected tank semiannually (i.e., once every six months) [35 IAC 218.123(b)(4)].
- b. For each affected storage tank, used to store petroleum liquids (See Condition 7.3.3), the Permittee shall verify compliance with the applicable control and operating requirements of 35 IAC 218.123 by visually inspecting the applicable storage tank's cover and seals whenever the tank is emptied for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b)(5)].
- c. For each affected storage tank, used to store VOLs (See Condition 7.3.3), the Permittee shall verify compliance with the requirements of 35 IAC 218.120(a)(1) by visually inspecting the applicable storage tank as follows:
 - i. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, the Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure is detected during the required inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the owner or operator may request a 30-day extension from the Illinois EPA in the inspection report required in Condition 7.3.10. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the owner or operator will take that will assure that the control equipment will be repaired or the vessel will be emptied within 60 days [35 IAC 218.127(a)(2)].
 - ii. For vessels equipped with both primary and secondary seals, the Permittee shall visually inspect the affected storage tanks as follows [218.127(a)(3)]:

- A. In accordance with the requirements of 7.3.8(c)(iii) below at least every 5 years; or
 - B. In accordance with the requirements of 7.3.8(c)(i) above at least once every 12 months.
- iii. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal, or if the seal fabric or the secondary seal has holes, tears, or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified above exists before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Condition 7.3.8(c)(i) and 7.3.8(c)(ii)(B) above and at intervals no greater than 5 years in the case of vessels specified in Condition 7.3.8(c)(ii)(A) above [35 IAC 218.127(a)(4)].
- d. Compliance with the inspection requirements of Condition 7.3.8(c) is deemed more stringent than the requirements in 7.3.8(a) and (b). Therefore, the inspections required by Condition 7.3.8(c) shall supercede the inspections required under 7.3.8(a) and (b).
- e. The Permittee is required to perform semi-annual inspections as per Conditions 7.3.8(a) and (b), these inspections shall include but are not limited to the procedures and requirements in Condition 7.3.8(c)(i). The semi-annual inspection requirements in Conditions 7.3.8(a) and (b) are deemed to be more stringent than the annual inspection requirements Conditions 7.3.8(c)(i). Conversely, compliance with the inspection and repair requirements of Condition 7.3.8(c) is deemed more stringent than the requirements in Conditions 7.3.8(a) and (b).

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected emission units to demonstrate compliance with

Conditions 5.6.1 and 7.3.5 and 7.3.6 pursuant to Section 39.5(7)(b) of the Act:

- a. A record of each inspection performed as required by the Condition 7.3.8 and as per 35 IAC 218.123(b)(4) and (5), 218.127(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall include the following [35 IAC 218.123(b)(6) and 218.129(a)(2)]:
 - i. Type of inspection;
 - ii. Date and time of the inspection and/or measurement was performed;
 - iii. Who performed the inspection and/or measurement;
 - iv. The method of inspection and/or measurement;
 - v. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
 - vi. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with the Out-of-Service Inspection requirements of Condition 7.3.8(b)(i):

Records that are sufficient to identify whenever the tank is empty for any reason or whenever repairs are made as a result of regular inspection or incident of roof damage or defect.
- c. The Permittee shall keep the operating records for each affected tank, as follows:

Records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period [Section 39.5(7)(f)(ii) of the Act and 35 IAC 218.129(g)].

7.3.10 Reporting Requirements

- a. Reporting of Deviations

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

- i. Storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.3.5, e.g., no "secondary seal," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
- ii. Any storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.3.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
- iii. If any of the conditions described in Condition 7.3.8(c)(i) and 35 IAC 218.127(a)(2) are detected during the annual visual inspection required by Condition 7.3.8(c)(i) and 35 IAC 218.127(a)(2), report to the Illinois EPA within 30 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made [35 IAC 218.129(a)(3)].
- iv. After each inspection required by Condition 7.3.8(c)(ii) and 35 IAC 218.127(a)(3) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 7.3.8(c)(ii)(B) and 35 IAC 218.127(a)(3)(B) are discovered, report to the Illinois EPA within 30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of Conditions 7.3.5 and 7.3.8 and 35 IAC 218.120(a)(1) or (2) or 35 IAC 218.127(a), and list each repair made [35 IAC 218.129(4)].

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

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

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.3 of this permit.
- b. Changes accounted for in Condition 5.11.

7.3.12 Compliance Procedures

- a. Compliance with Condition 7.3.3(b) and (c) is based upon the control and operational requirements in Condition 7.3.5.
- b. Compliance with Condition 7.3.5 is addressed by the inspection requirements of Condition 7.3.8, the records required in Condition 7.3.9, and the reporting requirements in Condition 7.3.10.
- c. Emissions from each affected storage tank shall be determined through the use of the most current version of the TANKS program.
- d. For the purpose of estimating HAP emissions from equipment at the facility, the vapor weight percent (based on a 1992 USEPA survey or calculations based MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

7.4 Group 4 - Tanker Truck Loading/Unloading Stations

7.4.1 Description

Tanker truck loading and unloading stations are used to load and unload various volatile organic liquids. The VOM emissions from loading occur when material is loaded into delivery vessels. The VOM emissions from unloading organic liquids are accounted for in the working losses of the storage tanks that the material is loaded into, with the exception of fugitive emissions that are attributed to the components, i.e., valves, flanges, etc., associated with the tank truck loading stations.

Note: This narrative description is for informational purposes only and is not enforceable.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Tanker Truck Loading Station	Loading Station That Includes One Loading Point	Permanent Submerged Fill Pipe

7.4.3 Applicable Provisions and Regulations

- a. The "affected emission units" for the purpose of these unit-specific conditions, are truck loading and unloading stations described in Conditions 7.4.1 and 7.4.2.
- b. The truck loading and unloading stations are subject to the requirements of 35 IAC 218.122.
 - i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gal/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108 [35 IAC 218.122(a)].

As of the date of issuance of this permit, see page one of the permit, the Illinois EPA has not approved any alternative control.

- ii. 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 or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108, or unless such tank is a pressure tank as described in 35 IAC 218.121(a) or is fitted with a recovery system as described in 35 IAC 218.121(b)(2) [35 IAC 218.122(b)].

As of the date of issuance of this permit, see page one of the permit, the Illinois EPA has not approved any alternative control.

- iii. Exception: If no odor nuisance exists the limitations of 35 IAC 218.122 shall only apply to the loading of VOL with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294°K (70°F) [35 IAC 218.122(c)].
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304, and the following exception: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 218.301]. (See Condition 5.3.2(c))

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected loading stations are not subject to the requirements of 40 CFR 60 Subpart XX because they do not load materials (e.g., gasoline) that fall under the applicability provisions of the NSPS for Bulk Gasoline Terminals. (See Condition 5.3 and 5.4)
- b. The affected loading stations are not subject to the requirements of 35 IAC Part 218, Subpart Y, because they do not load gasoline from the storage tanks into the delivery vessels (tank trucks) [35 IAC 218.581(b)].
- c. The affected loading stations are not subject to the requirements of 35 IAC Part 218, Subpart TT, because it is subject to 35 IAC 218, Subpart B [35 IAC 218.980(a) and (b)].
- d. The affected tanks are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected loading stations do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.4.5 Control Requirements and Work Practices

- a. Pursuant to Condition 7.4.3(b)(i), the Permittee is prohibited from loading in organic liquids from the

aggregate loading pipes of any loading area any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes as required under 35 IAC 218.122(a).

Pursuant to the definition in 35 IAC 211.6470(b), "Submerged loading pipe" means, for purposes of 35 Ill. Adm. Code 218, any discharge pipe or nozzle which meets either of the following conditions:

- i. Where the tank is filled from the top, the end of the discharge pipe or nozzle must be totally submerged when the liquid level is 15 cm (6 in.) above the bottom of the tank [35 IAC 211.6470(b)(1)].
- ii. Where the tank is filled from the side, the discharge pipe or nozzle must be totally submerged when the liquid level is 46 cm (18 in.) above the bottom of the tank [35 IAC 211.6470(b)(2)].

7.4.6 Production and Emission Limitations

Production and emission limitations are not set for the affected emission units. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.4.7 Testing Requirements

Testing requirements are not set for the affected emission units. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.4.8 Monitoring and Inspections Requirements

The Permittee is required to inspect and verify, on a monthly basis, that each loading area is equipped with a submerged loading pipe as per Condition 7.4.5.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected emission unit to demonstrate compliance with Conditions 5.6.1 and 7.4.3(b), pursuant to Section 39.5(7)(b) of the Act:

- a. The identification and properties of each organic liquid distributed through each affected loading station, as related to emissions, i.e., the materials name, vapor pressure, and molecular weight;
- b. The amount of each organic liquid distributed through each affected loading station, in gallons per month and gallons per year, with annual records updated each month by

totaling the throughput for that month plus the preceding 11 months;

- c. Emissions of VOM attributable to loading of petroleum products, in tons/month and tons/year, with supporting calculations, calculated utilizing compliance procedures in Condition 7.4.12, with annual records updated each month by totaling the emissions for that month plus the preceding 11 months; and
- d. Records of the monthly inspections required in Condition 7.4.8.

7.4.10 Reporting Requirements

a. Reporting of Deviations

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

- i. Operation of the affected loading rack in excess of the limits specified in Condition 7.4.3 or operation of the affected loading rack without the submerged loading pipe required in 7.4.3(b) within 30 days of such occurrence.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected emission units. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.4.12 Compliance Procedures

- a. Compliance with Condition 7.4.3(b) and (c) is based upon the control and operational requirements in Condition 7.4.5.
- b. Compliance with Condition 7.4.5 is addressed by the inspection requirements of Condition 7.4.8, the records required in Condition 7.4.9, and the reporting requirements in Condition 7.4.10.
- c. Compliance with the VOM emission limit in Condition 5.6 is addressed by the records required in Condition 7.4.9 and the emission factors and formulas listed below:

$$\text{Total Emissions (lb/month)} = LL = 12.46 \times [S \times P \times M/T]$$

Where:

L = Loading losses, in lbs/1,000 gallon

S = Saturation factor (unit less)

P = True vapor pressure, in psia

M = Molecular weight of vapors, in lb/lb-mole

T = Temperature of bulk liquid loaded, in degrees Rankine

- b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor weight percent (based on a 1992 USEPA survey or calculations based MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

7.5 Group 5 - Fugitives from Leaking Components

7.5.1 Description

Fugitive emissions from equipment components, those not included in the loading rack emissions, such as valves, flanges, etc., are generated during the processing of organic liquids through the piping distributed throughout the source.

Note: This narrative description is for informational purposes only and is not enforceable.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Equipment Components (valves, Flanges, Pump Seals, etc.)	Processing of Material Throughout the Source's Piping System	Work Practices and Equipment Replacement

7.5.3 Applicable Provisions and Regulations

- a. The "affected emission units" for the purpose of these unit-specific conditions, are the components described in Conditions 7.5.1 and 7.5.2.
- b. No person shall cause or allow the discharge of more than 32.8 ml (2 cu. in.) of VOL with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions [35 IAC 218.142].

7.5.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the affected components not being subject to 35 IAC 218 Subpart TT, Other Emission Units, because the affected components do not meet the applicability of 35 IAC 218.980(a) and (b). In particular, the affected recovery system has:
 - i. As a group, the maximum theoretical emissions of VOM from the affected components is less than 90.7 Mg (100 tons) per year; and
 - ii. A potential to emit for VOM that is less than 22.7 Mg (25 tons) per year.
- b. The affected emission units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.5.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected pumps, compressors, and other piping components. However, there are requirements for source-wide control requirements and work practices set forth in Condition 5.5.

7.5.6 Production and Emission Limitations

Production and emission limitations are not set for the affected emission units. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.5.7 Testing Requirements

Testing requirements are not set for the affected components. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.5.8 Monitoring and Inspections Requirements

The Permittee shall perform leak inspections of the source's affected pumps, compressors, and other piping components on at least a monthly basis. If a leak is detected by any means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs within 15 days after the leak is found, unless the leaking component cannot be repaired until the next emission unit shutdown, in which case the leaking component must be repaired before the unit is restarted.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected components to demonstrate compliance with Conditions 5.6.1, 7.5.5 and 7.5.8, pursuant to Section 39.5(7)(b) of the Act:

- a. The number of components (i.e., valves, pump seals, etc.) in service, as applicable.
- b. Records for Pump and Compressor Inspections and Repair

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 7.5.5.

- i. The performance of an inspection or other observation identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;

- ii. The condition, i.e., idle or operation, of each pump or compressor inspected;
 - iii. The presence of a leak, with description and the means of identification;
 - iv. The date the leak was repaired, or the component taken out of service; and
 - v. If a corrective action, as in Condition 7.5.5, was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.
- c. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.) tons/month and tons/year, with supporting calculations, calculated utilizing the compliance procedures in Condition 7.5.12 or other approved USEPA methodology.

7.5.10 Reporting Requirements

a. Reporting of Deviations

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

- i. Operation of the affected components in excess of the limits specified in Condition 7.5.5 within 30 days of such occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected components. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.5.12 Compliance Procedures

- a. Compliance with Conditions 7.5.3(b) shall be based upon the inspections and repair requirements in Condition 7.5.5 and the recordkeeping and reporting requirements in Conditions 7.5.9 and 7.5.10, respectively.
- b. Compliance with the emission limit in Condition 5.6 is addressed by the records required in Condition 7.5.9 and the emission factors and formulas listed below:

$$\text{Total Fugitive VOM Emissions (lb/hr)} = \sum_{i=1} EF_i \times N_i$$

Where:

EF_i = The specific component's (i.e., valves, pump seals, etc.) emission factor listed below. Emission factors found in "Development of Fugitive Emission Factors and Emission Profiles for Petroleum Marketing Terminals, Volume 1, Published by the American Petroleum Institute; and

Component	(lb/hr - Comp.)
Connectors	2.3×10^{-5}
Valves	1.5×10^{-4}
Open-Ended Lines	6.7×10^{-3}
Pump Seals	9.3×10^{-4}
Loading Arm Valves	8.7×10^{-4}
Other ^a	2.87×10^{-4}

a Other means any components other than connectors, valves, open-ended lines, and pump seals.

N_i = Number of specific components (i.e., valves, pump seals, etc.) in service as recorded in the records required in Condition 7.5.9.

Total annual emissions, in tons/year, shall be calculated by multiplying the hourly emission by 8,760 hours/year.

- c. For the purpose of estimating HAP emissions from equipment at the facility, the vapor weight percent (based on a 1992 USEPA survey or calculations based MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable.

7.6 Group 6 - Boiler

7.6.1 Description

A natural gas-fired boiler is used to produce steam for heating and air conditioning at the source. Distillate fuel is used as a backup fuel when the natural gas supply is disrupted.

Note: This narrative description is for informational purposes only and is not enforceable.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Unit 4	Boiler #48	Natural Gas-Fired Boiler Maximum Heat Input Capacity: 8.79 mmBtu/Hr	None

7.6.3 Applicable Provisions and Regulations

- a. The "affected emission unit" for the purpose of these unit-specific conditions, is the steam generating unit that is fired with natural gas or distillate oil, with a heat input capacity less than 10 mmBtu/hr described in Conditions 7.6.1 and 7.6.2.
- b. While burning fuel oil, the Permittee shall comply with the following:
 - i. The emissions of particulate matter (PM) into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion emission unit using liquid fuel exclusively [35 IAC 212.206].
 - ii. The emission of sulfur dioxide (SO₂) into the atmosphere in any one hour period from any existing fuel combustion emission unit, burning liquid fuel exclusively shall not exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/mmBtu) [35 IAC 214.161(b)].
- c. 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 the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

7.6.4 Non-Applicability of Regulations of Concern

- a. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9, 1989, with firing rates of 100 mmBtu/hr or less, but greater than 10 mmBtu/hr. The firing rate of the affected boiler is below the firing rate for which the NSPS would be applicable. Therefore, these rules do not apply.
- b. The affected boiler is not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).
- c. The affected boiler is not subject to 35 IAC 216.121, emissions of CO from existing fuel combustion emission units, because the actual heat input of the affected boiler is less than 2.9 MW (10 mmBtu/hr).
- d. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.
- e. The affected emission units are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission unit does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.6.5 Control Requirements and Work Practices

- a. The affected boiler shall only be operated with natural gas or distillate fuel oil as the fuels.
- b. The Permittee shall not use distillate fuel oil (Grades No. 1 and 2 fuels) in the affected boiler with a sulfur content greater than the larger of the following two values:
 - i. 0.28 weight percent; or
 - ii. The weight percent given by the formula:
$$\text{Maximum Weight Percent Sulfur} = (0.000015) \times (\text{Gross Heating Value of Oil, Btu/lb}).$$

"Distillate fuel oil" means fuel oils of Grade No. 1 or 2 as specified in detailed requirements for fuel oil ASTM D-369-69 (1971) [35 IAC 211.1770].

7.6.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected boiler is subject to the following:

- a. Emissions from the affected boiler shall not exceed the following limits:

	Emissions					
	NO _x		CO		SO ₂	
	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Natural Gas or Distillate Fuel (backup)	0.66	2.88	0.14	0.61	---	---
	0.95	5.15	0.24	1.05	4.04	17.65

These limits are based on the maximum firing rate, maximum operating time, and standard emission factors.

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

The above limitations were established in Permit 96030210, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.6.7 Testing Requirements

- a. Opacity Testing

Pursuant to 39.5(7)(d)(ii) of the Act, the Permittee shall use USEPA Method 9 for testing opacity once a year during representative operating conditions while burning fuel oil. Testing is not required if fuel oil is not burned during the relevant time period.

- b. Fuel Oil Sampling

- i. The Permittee shall have the sulfur content of the oil supply to the affected boiler, in lb/mmBtu, determined from an analysis of representative sample of the distillate oil supply, as follows, pursuant to Section 39.5(7)(d) of the Act:

- A. From a sample taken no later than 90 days after first operating the affected boiler pursuant to this permit, provided, however, that if such

sample is taken following operation of the affected boiler, the sample shall be taken prior to adding more oil to the storage tank.

- B. From a sample taken no later than 30 days after acceptance of a shipment of fuel whose sulfur content would not meet Condition 7.6.3(b(ii)) based upon supplier data. Oil samples may be collected from the fuel storage tank for the affected boiler immediately after the fuel tank is filled and before any oil is combusted. The owner or operator of the affected facility shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. Results of the fuel analysis taken after each new shipment of oil is received shall be used to determine compliance with Conditions 7.6.3(b)(ii) and/or 7.6.5(b).
- C. From a sample taken no later than 30 days after a request for such a sample is made by the Illinois EPA, provided, however, that such sample shall be taken prior to adding more oil to the relevant storage tank.
 - ii. Sampling and analysis, including that which forms the basis for the suppliers' data, shall be conducted using methods that would be acceptable under the federal New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.44c (e.g., fuel sampling and analysis procedures under Method 19) or the federal Acid Rain Program, 40 CFR 75, Appendix D, Optional SO₂ Emissions Data Protocol for Gas-Fired and Oil-Fired Units, Section 2.2.4 - Manual Sampling (e.g., ASTM D4057-88, "Standard Practice for Manual Sampling of Petroleum and Petroleum Products"; Section 2.2.5 - ASTM D129-91, "Standard Test Method for Sulfur in Petroleum Products (General Bomb Method)"; Section 2.2.7 - ASTM D240-87 (Reapproved 1991), "Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter"; etc.).
 - iii. The fuel analyses required above may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

7.6.8 Monitoring Requirements

Monitoring requirements are not set for the affected boiler. However, there are provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected boiler to demonstrate compliance with Conditions 5.6.1 and 7.6.5 and 7.6.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Total natural gas usage for the affected boiler (ft³/month and ft³/year);
- b. Total distillate fuel oil usage for the affected boiler (gallons/month and gallons/year);
- c. Sulfur content of distillate fuel. In lieu of analysis of fuel in the storage tank after each shipment, the Permittee may keep records of sulfur content analysis (% by wt.) and gross heating value of the oil (mmBtu/lb) provided by the supplier for each shipment [See Condition 7.6.7(b)];
- d. Annual aggregate NO_x, CO, PM, SO₂, and VOM emissions from the affected boiler, based on fuel consumption and the applicable emission factors, with supporting calculations; and
- e. Results of all tests performed to verify proper operation of the affected boiler and/or compliance with the requirements and limitations of this permit (e.g., Condition 7.6.7).

7.6.10 Reporting Requirements

a. Reporting of Deviations

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

- i. Notification within 30 days of operation of the affected boiler that may not have been compliance with the opacity limitations in Conditions 5.2.2(b) and 7.6.3(c), with a copy of such record for each incident.
- ii. If there is an exceedance of sulfur content of distillate fuel oil in excess of the limit specified

in Conditions 7.6.3(b)(ii) and/or 7.6.5(b), the Permittee shall submit a report within 30 days after receipt of a noncompliant shipment of distillate fuel oil.

- iii. Emissions of NO_x, PM, SO₂, or VOM from the affected boilers in excess of the limits specified in Condition 5.6 and 7.6.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.
- iv. Notification within 14 days of operation of the affected boiler that may not have been compliance with the operational limits in 7.6.5(a) and/or the fuel testing requirements in Conditions 7.6.7(b).

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected boiler. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.6.12 Compliance Procedures

- a. Compliance with the PM emission limitation of Condition 7.6.3(b)(i) the fuel records required in Condition 7.6.9 and emission calculations using the emission factor in USEPA's Compilation of Air Pollutant Emission Factors, AP-42, for uncontrolled emissions from a natural gas and/or oil fired boiler.
- b. Compliance with the opacity limit in Conditions 5.2.2 and 7.6.3(c) is based upon the testing required in Condition 7.6.7 and proper operation of natural gas-fired and distillate oil-fired boilers.
- c. Compliance with the SO₂ emission limitation of Condition 7.6.3(b)(ii) is addressed by the testing requirements of Condition 7.6.7, the recordkeeping requirements in Condition 7.6.9, and the following formula for SO₂:

$$\text{SO}_2 \text{ Emissions (Lb/mmBtu)} = (2 \text{ SO}_2/\text{S}) \times (\text{Weight Percent Sulfur in the Fuel}) / (\text{Gross Heating Value of Oil, mmBtu/Lb})$$

Further, compliance with Condition 7.6.5(a) and (b), assures compliance with Condition 7.6.3(b)(ii) based upon the following:

Condition 7.6.5(a)

$$0.3 \frac{\text{lb SO}_2}{\text{mmBtu}} \times 10^{-6} \frac{\text{mmBtu}}{\text{btu}} \times 0.5 \frac{\text{S}}{\text{SO}_2} \times 19,170 \frac{\text{btu}}{\text{lb}} \times 100\% \approx 0.28\%$$

Where:

0.3 lb/mmBtu = SO₂ limitation in Condition 7.6.3(b)(ii) and 35 IAC 214.161(b).

0.5 = Ratio of molecular of weight of sulfur in SO₂ (32/64).

19,170 mmBtu/lb = Worst Case heat of combustion of distillate oil.

and

Condition 7.6.5(b)

Where the maximum weight percent sulfur equation constant is calculated as follows :

$$0.3 \frac{\text{lb SO}_2}{\text{mmBtu}} \times 10^{-6} \frac{\text{mmBtu}}{\text{btu}} \times 0.5 \frac{\text{S}}{\text{SO}_2} \times 100\% = 0.000015 \frac{\%}{\text{btu/lb}}$$

Where:

0.3 lb/mmBtu = SO₂ limitation in Condition 7.6.3(b)(ii) and 35 IAC 214.161(b)

0.5 = Ratio of molecular of weight of sulfur in SO₂ (32/64).

- d. Compliance with the emission limits in Conditions 5.6 and 7.6.6 shall be based on the recordkeeping requirements in Condition 7.6.9 and the emission factors and formulas listed below:

- i. A. Emission factors for the affected boiler when fired by natural gas:

<u>Pollutant</u>	<u>Emission Factors</u> <u>(lb/10⁶ ft³)</u>
VOM	5.5
PM	7.6
SO ₂	0.6
NO _x	100
CO	84

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, August, 1998.

- B. Emission formula for the affected boiler when fired by natural gas:

(Boiler Emissions, lb) = (The Appropriate Emission Factor, lb/mmscf) x (Natural Gas Usage, 10⁶ ft³)

- ii. A. Emission factors for the affected boiler when fired by distillate fuel oil:

<u>Pollutant</u>	<u>Emission Factors</u> <u>(lb/1,000 gal)</u>
VOM	0.2
PM	2
SO ₂	142(S)
NO _x	20
CO	5

These are the emission factors for uncontrolled distillate fuel oil combustion in commercial/institutional/residential combustors, Tables 1.3-1 and 1.3-2, AP-42, Volume I, Supplement E. "S" indicates that the weight percent of sulfur in the oil should be multiplied by the value given, as determined by the records required in Condition 7.6.9(a).

- B. Emission formula for the affected boiler when fired by distillate fuel oil:

(Boiler Emissions, lb) = (The Appropriate Emission Factor, lb/1,000 gal) x (Distillate Fuel Oil Consumed (1,000 gal))

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

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

This permit shield does not extend to applicable requirements which are promulgated after June 29, 2007 (the date of issuance of the proposed permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test

methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods 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 Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA

every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

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

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

8.6.2 Test Notifications

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

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

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The

test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

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

8.6.4 Reporting Addresses

- a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.
- b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

- i. Illinois EPA - Air Compliance Unit

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

- ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

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

iv. USEPA Region 5 - Air Branch

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

- c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

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

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule.
- 9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:
- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 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.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

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

practices, or operations regulated or required under this permit;

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

9.4 Obligation to Comply with Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

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

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

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

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, 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 Permittee 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].

9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

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

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the 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 Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

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 this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

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

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

- a. 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 particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter 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 subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.321(b)]:

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

where:

P = Process weight rate; and

E = Allowable emission rate; and,

A. Up to process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.214	2.54
B	0.534	0.534

B. For process weight rate greater than or equal to 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	11.42	24.8
B	0.16	0.16

iii. Limits for Process Emission Units For Which Construction or Modification Commenced On or After April 19, 1972 [35 IAC 212.321(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

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

- i. 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 subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- ii. Interpolated and extrapolated values of the data in subsection (c) of 35 IAC 212.321 shall be determined by using the equation [35 IAC 212.322(b)]:

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

where:

P = Process weight rate; and

E = Allowable emission rate; and,

A. Up to process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

B. For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lb/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

iii. Limits for Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric P <u>Mg/hr</u>	E <u>kg/hr</u>	English P <u>T/hr</u>	E <u>lb/hr</u>
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.2	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.15	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Attachment 3 - Summary of Storage Tank Features and Groupings

Group 1 Tanks

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Maximum Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Tank A-1	420,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-3	630,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-4	420,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-6	210,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-8	210,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-9	420,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-10	840,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-12	630,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-14	840,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Maximum Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Tank A-18	210,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-19	210,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-20	420,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank A-21	420,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-1	20,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-2	20,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-3	20,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-4	25,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-5	25,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-6	25,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-7	35,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Maximum Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Tank AS-8	35,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-9	35,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-10	35,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-11	35,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AS-16	60,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AH10-A	7,500	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AH10-B	7,500	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AH10-C	7,500	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AH10-D	7,500	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AH10-E	4,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AH10-F	5,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Maximum Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Tank AH10-G	5,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AH10-H	5,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank AH10-I	5,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank BM-2	15,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank BM-3	15,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank BM-4	5,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Tank BM-5	5,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
Dock 1	10,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
T/C B	8,000	Fixed	None	None	Various Chemical Products	1.0	Pre-1972
T/C G	8,000	Fixed	None	None	Various Chemical Products	--	Pre-1972
Diesel	10,000	Fixed	None	None	Various Chemical Products	--	Pre-1972

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Maximum Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Dock 2	3,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
A (Blend)	60,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972
B (Blend)	60,000	Fixed	None	None	Various Chemical Products	<0.75	Pre-1972

Group 2 Tanks

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Maximum Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Group 2 SP1	25,000	Fixed	None	None	Various Chemical Products	<0.75	1994
SP2	25,000	Fixed	None	None	Various Chemical Products	<0.75	1994

Group 3 Tanks

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Maximum Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Group 3 Tank A-2	210,000	Internal Floating Roof	Vapor Mounted Resilient Seal	Rim-Mounted	Various Chemical Products	11.1	Pre-1972 IFR added July/2000
Tank A-5	105,000	Internal Floating Roof	Double-Wiper	Rim-Mounted	Various Chemical Products	11.1	Pre-1972
Tank A-7	420,000	Internal Floating Roof	Double-Wiper	Rim-Mounted	Various Chemical Products	11.1	Pre-1972
Tank A-11	840,000	Internal Floating Roof	Double-Wiper	Rim-Mounted	Various Chemical Products	11.1	Pre-1972

<u>Group/Tank No.</u>	<u>Capacity (Gallons)</u>	<u>Tank Type</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>	<u>Material Stored</u>	<u>Expected Maximum Vapor Pressure (psia at 70°F)</u>	<u>Date Constructed</u>
Group 3 (Cont.)							
Tank A-13	1,680,000	Internal Floating Roof	Double-Wiper	Rim-Mounted	Various Chemical Products	11.1	Pre-1972
Tank A-22	1,260,000	Internal Floating Roof	Double-Wiper	Rim-Mounted	Various Chemical Products	11.1	Pre-1972
Tank BM-1	15,000	Internal Floating Roof	Vapor Mounted Resilient Seal	Rim-Mounted	Various Chemical Products	11.1	Pre-1972 IFR added July/2000

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf

www.epa.state.il.us/air/permits/197-fee.pdf

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