

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

DIVISION of AIR POLLUTION CONTROL

PERMIT SECTION

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

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

Illinois EPA ID Number: 031808AAD

Application Number: 95080098

Application Type: Renewal

Start of Public Comment Period: March 12, 2007

Close of Public Comment Period: April 11, 2007

Permit Engineer/Technical Contact: Mike Davidson, 217/782-2113

Community Relations/Comments Contact: Brad Frost, 217/782-7027

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

I. INTRODUCTION

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

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

The principal changes from the previous version of the CAAPP permit are as follows:

Title Page	Addressee and responsible official was changed to show "Terry Kolacki, Plant Manager"
Condition 1.0	Changed contact information
Condition 3.1.1	Inclusion of tanker truck cleaning operation in the list of insignificant activities;
Condition 5.0	Added new limitations regarding the HAP PTE, testing, records,...etc.
Condition 5.1.1	Corrected the previous error where the source was identified as being major for HAPs. (See supporting documentation provided with the application)
Condition 5.3.2	Added requirement for 35 IAC 218.301.

Condition 5.5	Added clarification to Condition 5.5.1 in that the limits were imposed in order to avoid applicability of requirements in Section 5.4 and deleted Condition 5.5.2 pertaining to pump, compressors and leaking component inspections and added the requirements to Section 7.5.
Condition 5.6.1	Corrected typographical error
Condition 5.7.2	Revised and added to the HAP testing requirement
Condition 5.8	Deleted notification requirement formally in Condition 5.8.1(a) and moved it to Section 5.10.3
Condition 5.9.2	Clarified that testing results from Condition 5.7.2 has precedence over emissions estimate from Condition 5.12.
Condition 5.9.5	Deleted leak inspection records requirements for pumps, compressors, and other piping components and moved them to Section 7.5.
Condition 5.10.3	Added notification requirement formally in Condition 5.8.1(a)
Condition 5.10.3	Deleted malfunction and breakdown records requirement since the Permittee does not have approval to operate during malfunctions and breakdowns. Requirement is covered under Condition 5.10.1.
Condition 5.13	Deleted permit shield since the Permittee is required comply with requirements in Section 7.5.
Condition 7.1.2	Added reference to Attachment 3
Condition 7.1.3	Added applicable regulations, i.e., 35 IAC 218.119, 218.120 and 218.301.
Condition 7.1.4	Revised to clarify non-applicability of requirements and added 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources to the listing. CAM is non-applicable because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.
Condition 7.1.9	Additional recordkeeping requirements were added

Condition 7.1.12	Augmented compliance procedures pursuant to addition of requirements in Condition 7.1.3.
Condition 7.2.2	Added reference to Attachment 3
Condition 7.2.3	Added applicable regulations, i.e., 218.301.
Condition 7.2.4	Revised to clarify non-applicability of NSPS requirements. Note: Revisions made to show that the affected tanks are no longer subject to 40 CFR 60 Subpart Kb, pursuant to 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
	Added 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources to the listing. Non-applicable because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.
Condition 7.2.6	Clarified Title 1 limitations is based upon the emissions increase as being a natural minor.
Condition 7.2.9	Revised tank records requirement
Condition 7.2.12	Augmented compliance procedures pursuant to addition of requirements in Condition 7.2.3.
Condition 7.3.1	Added clarification that the internal floating roofs are equipped with both a primary and secondary seal
Condition 7.3.2	Incorporation of the construction of internal floating roofs on to two existing fixed roof storage tanks (i.e., Tanks A2 and BM1) and added reference to Attachment 3
Condition 7.3.3	Added applicable regulations, i.e., 218.301.

Condition 7.3.4	Revised to clarify non-applicability of NSPS requirements and added 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources to the listing. Note, CAM is non-applicable 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..
Condition 7.3.5(b)	Added clarification in regard to the submerged loading requirement
Condition 7.3.5(d)(i)	Deleted the following “Such floating roof shall not be permitted if the VPL has a vapor pressure of 86.19 kPa (12.5 psia) or greater at 294.3°K (70°F).”, due to the limit in Condition 7.3.5(a).
Condition 7.3.8(e)	Added to clarify semi-annual inspections requirement as per Conditions 7.3.8(a) and (b). This limit is more stringent than requirements in Conditions 7.3.8(c)(i).
Condition 7.3.12(a) & (b)	Augmented compliance procedures in Condition 7.3.3 and 7.3.5.
Condition 7.4.3	Added applicable regulations, i.e., 218.301.
Condition 7.4.4	Added 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources to the listing. Non-applicable because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.
Conditions 7.4.5	Added submerged loading requirement
Conditions 7.4.8	Added submerged loading inspections as per Condition 7.4.5
Conditions 7.4.9	Revised Condition 7.4.9(c) and added Condition 7.4.9(d), i.e., records of monthly inspections required in 7.4.8
Conditions 7.4.10	Revised reporting requirement to include operation without required submerged loading.
Conditions 7.4.12	Augmented compliance procedures in Conditions 7.4.12(a) and (b)

Conditions 7.5.3	Deleted reference to permit shield in Condition 5.13 as per the changes referenced above
Conditions 7.5.4	Added 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources to the listing. Non-applicable because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.
Conditions 7.5.5	Revised and deleted inspection and repair requirement. Condition was moved to Conditions 7.5.8.
Conditions 7.5.8	Revised and added requirements from Conditions 7.5.5
Conditions 7.5.9 Condition 7.5.12(a)	Revised to add requirements formally in Condition 5.9 Augmented compliance procedures.
Conditions 7.6.3(c)	Revised to clarify opacity limitations
Conditions 7.6.7	Added opacity testing in order to verify compliance with Condition 7.6.3(c) and fuel sampling requirements in order to verify compliance with Conditions 7.6.3(b)(ii) and 7.6.5.
Conditions 7.6.9	Added addition recordkeeping requirements pursuant to Conditions 7.6.7 and 7.6.12.
Conditions 7.6.10	Revised reporting requirements pursuant to Conditions 7.6.3, 7.6.7, and 7.6.12.
Conditions 7.6.12	Augmented compliance procedures.
Appendix 10.0 - Attachment 3	Corrected vapor pressure typographical error

II. GENERAL SOURCE DESCRIPTION

a. Nature of source

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.

b. Ambient air quality status for the area

The source is located in an area that is currently 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 carbon monoxide, lead, nitrogen dioxide, PM₁₀, and sulfur dioxide.

c. Major source status

1. The source requires a CAAPP permit as a major source of volatile organic material (VOM) emissions.

d. Source Emissions

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

Pollutant	Annual Emissions (tons)				
	2004	2003	2002	2001	2000
CO	0.17	0.24	0.24	0.24	0.25
NO _x	0.20	0.28	0.29	0.43	0.33
PM	0.02	0.02	0.02	0.06	0.03
PM ₁₀	0.02	0.02	0.02	0.05	0.02
SO ₂	0.00	0.00	0.00	0.62	0.00
VOM	4.02	7.11	17.33	11.03	10.43
MEK (top HAP)	--	2.26	9.14	--	--

III. NEW SOURCE REVIEW/TITLE I CONDITIONS

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

CAAPP application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This draft permit would not establish any new Title I requirements or revised Title I requirements.

IV. COMPLIANCE INFORMATION

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

V. PROPOSED ILLINOIS EPA ACTION/REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

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

ATTACHMENT 1: Summary of Source-Wide Requirements

Table 1 Summary of applicable regulations

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

Program/Plan	Applicable
Emissions Reduction Market System (ERMS) ¹	Yes
Nitrogen Oxides (NO _x) Trading Program	No
Acid Rain Program	No
Compliance Assurance Monitoring (CAM) Plan	No
Fugitive Particulate Matter (PM) Operating Program ²	Yes
Risk Management Plan (RMP)	No
PM ₁₀ Contingency Measure Plan ³	Yes

1. The ERMS is a market-based program designed to reduce VOM emissions from stationary sources located in the Chicago ozone non-attainment area in order to contribute to reasonable further progress toward attainment (35 IAC Part 205). If applicable, this program is further described in Section 6.0 of the draft permit, including the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS.
2. The fugitive PM operating program is required to significantly reduce fugitive particulate matter emissions from certain affected locations and facilities (35 IAC Part 212.309 – 212.312). Normally, elements of this program include, but are not limited to, addressing normal traffic pattern roads, parking facilities, and material piles and handling through the use of water, oils, or chemical dust suppressants.
3. PM₁₀ Contingency Measure Plan is a program for PM10 emission reductions (35 IAC Part 212, Subpart U). The Permittee is required to maintain and have this plan on file with the Illinois EPA.

Table 2 (Section 5.0 of the draft permit)

Source-Wide Limitations	
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • See Table 1 above and Section 5.3 of the draft permit list the applicable source wide regulations.
Non-applicability (Section 5.4)	<ul style="list-style-type: none"> • 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] • 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] • 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] • 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] • 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] • 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) • 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]

Source-Wide Limitations	
Non-applicability (Section 5.4)	<ul style="list-style-type: none"> • 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] • 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]
Control & Work Practices (Section 5.5)	<ul style="list-style-type: none"> • Excludes the source's 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 from processing, storing, unloading or loading: <ul style="list-style-type: none"> ○ Gasoline or any other petroleum distillate or petroleum distillate/alcohol blend that is used as a fuel for internal combustion engines. ○ VOL containing vinyl chloride or benzene in excess of 2 percent by weight. <p>These limits were imposed in order for the source to avoid applicability of the regulations listed in Section 5.4.</p>
Periodic Monitoring (other than basic regulatory requirements)	
Testing (Section 5.7)	HAP testing required if source exceeds 80% of the major source threshold for HAPS (See Condition 5.7.2(b))
Operational Monitoring (Section 5.8)	VOL operational temperature and vapor pressure monitoring pursuant to 35 IAC 218.128(b) and (c)
Recordkeeping (Section 5.9)	General records for storage tanks, floating roof tank condition, source wide HAP emissions, and change in operating scenario records
Reporting	
Prompt Reporting	30 day reporting of operational change for those tanks which normal store organic liquids with vapor pressure below 0.75 psia pursuant to 35 IAC 218.128(a).
Other Reporting	Annual reporting of HAP emission order to verify compliance with non-major source limitation in Condition 5.6.2.

ATTACHMENT 2: Summary of Requirements for Specific Emission Units

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

Table 1 (Section 7.1 of the draft permit)

Emission Unit	
Name	Group 1 - Fixed Roof Storage Tanks
Description	Various sized conical and vertical fixed roof storage tanks used to store various organic liquids.
Date Constructed	A summary of the tank sizes, date constructed, usage...etc. is in Attachment 3 of the draft permit
Emission Control Equipment	Permanent submerged loading is used on these tanks, minimizing turbulence and evaporation of VOM during loading.
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 218.301 – Limits discharge of organic material to less than 8.0 lb/hr (See Conditions 5.3.2(c) and 7.1.6(b)). • 35 IAC 218.119 and 218.120(a) – Establishes applicability and emissions control limitations. <p>Note: Control is not required because of the vapor pressure limit in Condition 7.1.6.</p>
Non-applicability	<ul style="list-style-type: none"> • 40 CFR 60 Subparts K, Ka or Kb: excluded either due to storage capacity or date of construction. • 35 IAC 218.121: Petroleum liquid stored in the tank does not meet the definition of volatile petroleum liquid • 35 IAC 218.122: Vapor Pressure limit in Condition 7.1.6 • 35 IAC 218.123: Petroleum liquid stored in the tank does not meet the definition of volatile petroleum liquid • 35 IAC Part 218, Subpart QQ or TT: Affected tank is subject to 35 IAC 218, Subpart B • 40 CFR Part 64 (CAM) - The affected tanks do not use an add-on control device to achieve
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Not Required

Emission Unit	
Emissions Monitoring	Not Required - See Below
Operational Monitoring	Not Required - See Below
Inspections	Not Required - See Below
Recordkeeping	Tank Dimensions - 35 IAC 218.129(f) VOL Storage records - 35 IAC 218.129(g) Compliance records - Section 39.5(7)(b) of the Act
Other	Note source wide storage tank control and work practice limits, monitoring, recordkeeping, and reporting limitations shown in Sections 5.5, 5.8, 5.9 and 5.10, respectively of the draft permit.
Reporting	
Prompt Reporting	Exceedance of the vapor pressure limit in Conditions 7.1.3 and 7.1.6 required to be reported within 30 days
Other Information	
Flexibility	Condition 7.1.11: Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.1 of the permit.

Table 2 (Section 7.2 of the draft permit)

Emission Unit	
Name	Group 2 - Fixed Roof Storage Tanks built after July 23, 1984
Description	The Permittee operates fixed roof storage tanks to store various organic liquids collected during spill cleanup operations.
Date Constructed	A summary of the tank sizes, date constructed, usage...etc. is in Attachment 3 of the draft permit.
Emission Control Equipment	Permanent submerged loading is used on these tanks, minimizing turbulence and evaporation of VOM during loading.
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 218.301 – Limits discharge of organic material to less than 8.0 lb/hr (See Conditions 5.3.2(c) and 7.1.6(b)). • 35 IAC 218.119(g): Recordkeeping requirements of 35 IAC 218.129(f)
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Conditions 7.2.6. These limits were incorporated from Permit 94040043.
Non-applicability	<ul style="list-style-type: none"> • 40 CFR 60 Subparts K or Ka: Date of Construction • 40 CFR 60 Subparts Kb: Tank Capacity and Vapor Pressure limit in Condition 7.2.6 • 35 IAC 218.120: Vapor Pressure limit in Condition 7.2.6 • 35 IAC 218.121: Petroleum liquid stored in the tank does not meet the definition of volatile petroleum liquid • 35 IAC 218.122: Vapor Pressure limit in Condition 7.2.6 • 35 IAC 218.123: Petroleum liquid stored in the tank does not meet the definition of volatile petroleum liquid • 35 IAC Part 218, Subpart QQ or TT: Affected tank is subject to 35 IAC 218, Subpart B • 40 CFR Part 64 (CAM), The affected tanks do not use an add-on control device to achieve
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Not Required
Emissions Monitoring	Not Required - See Below
Operational Monitoring	Not Required - See Below
Inspections	Not Required - See Below

Recordkeeping	Tank Dimensions - 35 IAC 218.129(f) Compliance records - Section 39.5(7)(b) of the Act
Other	Note source wide storage tank control and work practice limits, monitoring, recordkeeping, and reporting limitations shown in Sections 5.5, 5.8, 5.9 and 5.10, respectively of the draft permit.
Reporting	
Prompt Reporting	Exceedance of the limits in Conditions 7.2.3 and 7.2.6 required to be reported within 30 days
Other Information	
Flexibility	Condition 7.2.11, allows changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of the permit.

Table 3 (Section 7.3 of the draft permit)

Emission Unit	
Name	Group 3 - Internal Floating Roof Storage Tanks
Description	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).
Date Constructed	A summary of the tank sizes, date constructed, usage...etc. is in Attachment 3 of the draft permit
Emission Control Equipment	Permanent submerged loading is used on these tanks, minimizing turbulence and evaporation of VOM during loading.
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 218.301 – Limits discharge of organic material to less than 8.0 lb/hr (See Conditions 5.3.2(c) and 7.1.6(b)). • 35 IAC 218.120(a), 218.121, 218.122(b), and 218.123: Subject to the control standards (i.e., permanent submerged loading pipe and internal floating roof for compliance)
Title I Conditions	<ul style="list-style-type: none"> • Not Applicable
Non-applicability	<ul style="list-style-type: none"> • 40 CFR 60 Subparts K or Ka: Date of Construction • 40 CFR 60 Subparts Kb: Installation of the internal floating roofs on the existing fixed roof tanks, referenced in Construction Permit 95050163 and 00020098, is not considered to be a modification since the new internal floating roofs constitutes greater control for the vessels. • 35 IAC 218.120(b): Vapor Pressure limit in Condition 7.3.5 • 35 IAC Part 218, Subpart QQ or TT: Affected tank is subject to 35 IAC 218, Subpart B • 40 CFR Part 64 (CAM): 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.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Not Required – See Below
Emissions Monitoring	Not Required – See Below
Operational Monitoring	Not Required – See Below

Emission Unit	
Inspections	Tank inspections required under 35 IAC 218.123(b) and 218.127(a). 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). (See Condition 7.3.8(e))
Recordkeeping	Tank inspection and operational records required under 35 IAC 218.129(a), (f), and (g)
Other	Note source wide storage tank control and work practice limits, monitoring, recordkeeping, and reporting limitations shown in Sections 5.5, 5.8, 5.9 and 5.10, respectively of the draft permit.
Reporting	
Prompt Reporting	Operation in violation of the control requirements (i.e., submerged loading and internal floating roof) in Condition 7.3.5 and 7.3.8 required to be reported within 30 days
Other Information	
Flexibility	Condition 7.3.11, allows changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.3 of the permit.

Table 4 (Section 7.4 of the draft permit)

Emission Unit	
Name	Group 4 - Tanker Truck Loading/Unloading Stations
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.
Date Constructed	Prior to 1972
Emission Control Equipment	Permanent submerged loading is used to minimize turbulence and evaporation of VOM during loading. [35 IAC 218.122(a)]
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 218.122: Subject to the control standards (i.e., permanent submerged loading pipe • 35 IAC 218.301 – Limits discharge of organic material to less than 8.0 lb/hr (See Conditions 5.3.2(c) and 7.1.6(b)).
Non-applicability	<ul style="list-style-type: none"> • 40 CFR 60 Subpart XX and 35 IAC Part 218, Subpart Y: Source does not load gasoline • 35 IAC Part 218, Subpart TT: Operation is subject to 35 IAC 218, Subpart B • 40 CFR Part 64 (CAM): because the affected loading stations do not use an add-on control device to achieve compliance with an emission limitation or standard.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Not Required – See Below
Emissions Monitoring	Not Required – See Below
Operational Monitoring	Not Required – See Below
Inspections	Inspection to verify, on a monthly basis, that each loading area is equipped with a submerged loading pipe as per Condition 7.4.5.
Recordkeeping	Records of organic liquid material throughput and physical properties (i.e., vapor pressure), VOM emission calculations and records of the monthly

Emission Unit	
	inspections required in Condition 7.4.8.
Other	Note source wide control and work practice limits, monitoring, recordkeeping, and reporting limitations shown in Sections 5.5, 5.8, 5.9 and 5.10, respectively of the draft permit.
Reporting	
Prompt Reporting	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) required to be reported within 30 days
Other Information	
Flexibility	None

Table 5 (Section 7.5 of the draft permit)

Emission Unit	
Name	Group 5 - Fugitives from Leaking Components
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 material through the piping distributed throughout the source.
Date Constructed	Prior to 1972
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 218.142: Leaks from pump or compressor
Non-applicability	<ul style="list-style-type: none"> • 35 IAC Part 218, Subpart TT: Applicability criteria in 35 IAC 218.980(a) and (b) • 40 CFR Part 64 (CAM): because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Not Required – See Below
Emissions Monitoring	Not Required – See Below
Operational Monitoring	Not Required – See Below
Inspections	Component leak inspections and repair required
Recordkeeping	Log of component inspection and repair, record of the number of each class of components and VOM emissions record.
Other	Note source wide storage tank control and work practice limits, monitoring, recordkeeping, and reporting limitations shown in Sections 5.5, 5.8, 5.9 and 5.10, respectively of the draft permit.
Reporting	
Prompt Reporting	Operation in violation of the work practice requirements in Condition 7.5.5 required to be reported within 30 days

Table 6 (Section 7.6 of the draft permit)

Emission Unit	
Name	Group 6 - Boiler
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.
Date Constructed	1996
Emission Control Equipment	None
Applicable Rules and Requirements	
Emission Standards	<ul style="list-style-type: none"> • 35 IAC 212.206: PM limit 0.10 lb/mmBtu while burning liquid fuel. • 35 IAC 214.161(b): SO₂ limit of 0.3 lb/mmBtu while burning liquid fuel (Compliance assured based upon the sulfur content limitation in Condition 7.6.5). • 35 IAC 212.123(a): General Opacity limitation.
Title I Conditions	<ul style="list-style-type: none"> • The draft permit contains limits on operation and emissions in Conditions 7.6.5 and 7.6.6. These limits were incorporated from Permit 96030210.
Non-applicability	<ul style="list-style-type: none"> • 40 CFR 60, Subpart Dc: Maximum firing rate less than applicability threshold (i.e., less than 10 mmBtu/hr). • 35 IAC 217.141: Maximum firing rate less than applicability threshold (i.e., less than 250 mmBtu/hr). • 35 IAC 218.301: Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301 • 40 CFR Part 64 (CAM): the affected emission unit does not use an add-on control device to achieve compliance with an emission limitation or standard
Periodic Monitoring (other than basic regulatory requirements)	
Testing	Opacity Testing and Fuel Oil Sampling pursuant to Section 39.5(7)(d) of the Act. Data will be used to verify compliance with limits in 7.6.3.
Emissions Monitoring	Not Required – See Below
Operational Monitoring	Not Required – See Below

Emission Unit	
Inspections	Not Required – See Below
Recordkeeping	Fuels Usage, sulfur content, emissions and results 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).
Other	Note source wide storage tank control and work practice limits, monitoring, recordkeeping, and reporting limitations shown in Sections 5.5, 5.8, 5.9 and 5.10, respectively of the draft permit.
Reporting	
Prompt Reporting	<ul style="list-style-type: none"> • Operation in violation of the opacity limits in 5.2.2, use of distillate fuel with a sulfur content in excess of the limits in Condition 7.6.5, and operation with emissions in excess of the limits in Conditions 5.6 and 7.6.6 are required to be reported within 30 days • 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).
Other Information	
Flexibility	None

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