PROPOSED CAAPP PERMIT
Interstate Brands Corporation
I.D. No.: 031126AAP
Application No.: 96030059
October 19, 1999

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Interstate Brands Corporation
Attn: Matt Yelland, Chief Engineer
7225 Santa Fe Drive
Hodgkins, Illinois 60525-5088

Application No.: 96030059
I.D. No.: 031126AAP
Applicant's Designation:
Date Received: March 6, 1996
Operation of: Bakery
Date Issued:
Expiration Date[2]:
Source Location: 7225 Santa Fe Drive, Hodgkins, Cook County
Responsible Official: Jeffrey Nutt, General Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a bakery, 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 William D. Marr at 217/782-2113.

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

DES:WDM:wdm

cc: Illinois EPA, FOS, Region 1
USEPA

1 This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

2 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Interstate Brands Corporation
7225 Santa Fe Drive
Hodgkins, Illinois 60525-5088
708/482-7770

I.D. No.: 031126AAP
Standard Industrial Classification: 2051, Bakery

1.2 Owner/Parent Company

Interstate Brands Corporation
12 East Armour Boulevard
Kansas City, Missouri 64141-6627

1.3 Operator

Interstate Brands Corporation
7225 Santa Fe Drive
Hodgkins, Illinois 60525-5088

Matt Yelland, Chief Engineer
708/482-7770

1.4 General Source Description

The Interstate Brands Corporation is located at 7225 Santa Fe Drive, Hodgkins. The source is a bakery that produces bread, buns, and muffins.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emissions Reduction Market System
°F	degrees Fahrenheit
ft^3	cubic foot
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
LAER	Lowest Achievable Control Technology
lb	pound
MACT	Maximum Achievable Control Technology
Mg	Megagram
mmBtu	Million British thermal units
$mmft^3$	Million cubic foot
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Dry ingredient feeding system with filters. The filters used on the dry ingredient feeding system are considered to be inherent control of the process equipment.

8.3 mmBtu/hr natural gas fired boilers.

3.78 mmBtu/hr natural gas fired garage heater.

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:

Bulk flour receiving and storage system with filters. The filters used on the bulk flour receiving and storage system are considered to be inherent control of the process equipment.

Dry ingredient mixing and weighing system with filters. The filters used on the dry ingredient mixing and weighing system are considered to be inherent control of the process equipment.

Dusting flour container filling station.

Ingrediators.

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 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)].

Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit’s process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee

shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
01	Main Bread Line Natural Gas Fired Baking Oven	November 1982	Natural Gas Fired Catalytic Oxidizer
	Variety Bread Line Natural Gas Fired Baking Oven	November 1982	Natural Gas Fired Catalytic Oxidizer
02	Bun Line Natural Gas Fired Baking Oven	November 1982	None
	Muffin Line Natural Gas Fired Griddle	November 1982	None
03	Natural Gas Fired Boiler	November 1982	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

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

5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

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

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

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

   Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

b. i. 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)].

   ii. 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].

   iii. 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].

c. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

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

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

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

5.2.5 Should this stationary source, as defined in 40 CFR Part 63, become subject to 40 CFR Part 63, then the owner or operator shall comply with the applicable requirements of 40 CFR Part 63 by the date(s) specified in the NESHAP and shall certify compliance with the applicable requirements

of 40 CFR Part 63 as part of the annual compliance certification as required by 40 CFR Part 70 or 71.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

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

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	64
Sulfur Dioxide (SO_2)	-
Particulate Matter (PM)	1
Nitrogen Oxides (NO_x)	19
HAP, not included in VOM or PM	-
TOTAL	84

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR

52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Retention and Availability of Records

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

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

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

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

5.7.2 Annual Emissions Report

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

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Permitted Emissions

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

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.

i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

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

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:

   i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

   ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source’s next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

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

   No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and

ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

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

b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 282 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 31.9481 tons per season.

A. This determination includes the use of 1995 and 1996 as baseline seasons.

B. This determination includes adjustment to actual emissions to account for voluntary over-compliance at the source, e.g., control requirements as specified in Condition 7.1.5(b) and emission limitations as specified in Condition 7.2.6, pursuant to 35 IAC 205.320(d), as further addressed in Section 7 of this permit.

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

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

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

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

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

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

ii. Deduction of ATUs as a consequence of emissions excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

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

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

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

6.11 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and

iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

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

Natural gas fired boiler.

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

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01 Natural Gas Fired Baking Ovens
Control Natural Gas Fired Catalytic Oxidizers

7.1.1 Description

These baking ovens are used to produce bread. Bakery products that contain yeast as an ingredient generate ethanol, a VOM, which is released during the baking process. The VOM emissions from each baking oven is controlled by a catalytic oxidizer. Each baking oven and catalytic oxidizer burns natural gas as the fuel.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity	Emission Control Equipment
01	Main Bread Line Natural Gas Fired Baking Oven	6.48 mmBtu/hr (Oven) 2.32 mmBtu/hr (Oxidizer)	Natural Gas Fired Catalytic Oxidizer
	Variety Bread Line Natural Gas Fired Baking Oven	5.16 mmBtu/hr (Oven) 2.32 mmBtu/hr (Oxidizer)	Natural Gas Fired Catalytic Oxidizer

7.1.3 Applicability Provisions and Applicable Regulations

a. The “affected ovens” for the purpose of these unit-specific conditions, are Natural Gas Fired Baking Ovens each controlled by a Natural Gas Fired Catalytic Oxidizer, for which construction or modification commenced on or after April 14, 1972, with a design capacity firing rate greater than 0.3 mmBtu/hr and less than 10 mmBtu/hr, and burn natural gas exclusively.

b. 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 determined by using the equation [35 IAC 212.321]:

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

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 408 Mg/hr (450 ton/hr):

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

d. Each affected oven is subject to the emission limits identified in Condition 5.2.2(c).

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected ovens not being subject to 35 IAC 218.301, Use of Organic Material, because ethanol does not create any odor nuisance and ethanol is not considered as a photochemically reactive material.

b. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart TT: Other Emission Units, because bakeries are exempted from the control requirements in Subpart TT, pursuant to 35 IAC 218.980(f).

c. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart FF: Bakery Ovens, because the regulation has been repealed by operation of law and is rendered null and void and of no force and effect.

7.1.5 Control Requirements

a. The catalytic oxidizers on the affected ovens shall each be operated so as to reduce outlet VOM concentration to no more than 5% of the inlet concentration (95% destruction) or 50 ppm, whichever is greater, except as provided in Condition 7.1.6(b).

b. The catalytic oxidizer on the main bread line natural gas fired baking oven shall be operated so as to reduce uncontrolled VOM emissions by 95% overall as provided by the combination of the capture system (100%) and the destruction across the catalytic oxidizer (95%), except as provided in Condition

7.1.6(b). The catalytic oxidizer on the variety bread line natural gas fired baking oven shall be operated so as to reduce uncontrolled VOM emissions by 85% overall as provided by the combination of the capture system (90%) and the destruction across the catalytic oxidizer (95%), except as provided in Condition 7.1.6(b).

7.1.6 Emission Limitations

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

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

Emission Unit	VOM Emissions (Lb/4 Week Period)	VOM Emissions (Ton/Year)
Main Bread Line	1650*	6.6
Variety Bread Line	4125*	16.5

* These limits do not apply during catalyst replacement or other malfunction and breakdown conditions.

The above limitations were established in Permit 82120046, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined on a four week period basis from the sum of the data for the current four week period plus the preceding 12 four week periods (running 13 four week period total).

b. Emissions of VOM from the affected ovens during malfunction and breakdown of the catalytic oxidizers, including catalyst replacement, shall not exceed 5 tons/year.

7.1.7 Operating Requirements

a. Natural gas shall be the only fuel fired in the affected ovens and catalytic oxidizers.

b. The Permittee shall follow good operating practices for the catalytic oxidizers, including periodic inspection, routine maintenance, and prompt repair of

defects, so as to address compliance with the control requirements in Condition 7.1.5.

c. Each affected oven shall be equipped and operated under negative pressure so that all VOM emissions are captured and discharged through the oven stacks to the catalytic oxidizer, except as provided in Condition 7.1.6(b), so as to address compliance with the control requirements in Condition 7.1.5(b).

7.1.8 Monitoring Requirements

Each catalytic oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the catalytic oxidizer is in use, except as provided in Condition 7.1.6(b). This device shall monitor the catalytic oxidizer temperature rise across each catalyst bed, so as to address compliance with the control requirements in Condition 7.1.5.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected oven to demonstrate compliance with Conditions 5.5.1, 7.1.6, 7.1.7, and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

a. Bread production (ton/4 week period and ton/year);

b. 4 week period and annual aggregate VOM emissions, based on bread production, the applicable emission factors from Condition 7.1.12(c), and the overall control efficiency, with supporting calculations;

c. 4 week period and annual aggregate VOM emissions, based on bread production and the applicable emission factors from Condition 7.1.12(c), during malfunction and breakdown of the catalytic oxidizer, with supporting calculations;

d. Records indicating development of the emission factors indicated in Condition 7.1.12(c) used to calculate VOM emissions;

e. Natural gas consumption ($mmft^3$/month and $mmft^3$/year);

f. Monthly and annual aggregate NO_x and CO emissions from the combustion of natural gas, based on natural gas consumption and the applicable emission factors from Condition 7.1.12(d), with supporting calculations;

g. The Permittee shall collect and record the following information each day for each affected oven and maintain the information at the source for a period of three years:

   i. Catalytic oxidizer pre and post catalyst bed temperature monitoring data (°F);

   ii. A log of operating time for the capture system, catalytic oxidizer, monitoring device, and the associated oven; and

   iii. A maintenance log for the capture system, catalytic oxidizer, and monitoring device detailing all routine and non-routine maintenance performed including dates and duration of any outages.

h. Records addressing use of good operating practices for the catalytic oxidizers:

   i. Records for periodic inspection of the catalytic oxidizers with date, individual performing the inspection, and nature of inspection; and

   ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

7.1.10 Reporting Requirements

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

a. The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected ovens;

b. Each period when the condition of the catalytic oxidizers that may have resulted in emissions of VOM from an affected oven in excess of the control requirements and emission limits specified in Conditions 7.1.5 and 7.1.6(a), within 30 days of such an occurrence; and

c. VOM emissions from an affected oven in excess of the emission limits specified in Condition 7.1.6, based on the current four week period’s records plus the

preceding 12 four week periods, within 30 days of such an occurrence.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

a. Compliance with the emission limits in Conditions 7.1.3(b), (c), and (d) is assumed to be achieved under inherent operating conditions of an affected oven, so that no compliance procedures are set in this permit addressing these requirements.

b. Compliance with the control requirements in Condition 7.1.5 is addressed by proper operation of a catalytic oxidizer, the operating requirements in Conditions 7.1.7(b) and 7.1.7(c), and the monitoring requirements in Condition 7.1.8.

c. Compliance with the VOM emission limits in Conditions 5.5.1 and 7.1.6 from the affected ovens shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

Emission Unit	Emission Factor (lb VOM/ton product)
Main Bread Line Baking Oven	7.51
Variety Bread Line Baking Oven	7.33

These are the emission factors for bread baking that were derived from Section 9.9.6, AP-42, Volume I, Supplement C, February, 1997, based on specific baking conditions.

The emission factor equation in Section 9.9.6, AP-42, was derived from USEPA's "Alternative Control Technology Document for Bakery Oven Emissions", (453/R-92-017, December, 1992).

Oven Emissions (lb) = (Bread production, ton) x (the applicable emission factor, lb/ton) x [1 – (the overall control efficiency*, % / 100)]

* As determined by the most recent stack test

d. Compliance with the emission limits in Condition 5.5.1 from the combustion of natural gas in the affected

ovens shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

Pollutant	Emission Factor ($lb/mmft^3$)
NO_x	100
CO	21

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 - <10 mmBtu/hr), Table 1.4-1, AP-42, Volume I, Supplement B, October, 1996.

Combustion Emissions (lb) = (Natural gas consumption, $mmft^3$) x (the applicable emission factor, $lb/mmft^3$)

7.2 Unit 02 Natural Gas Fired Baking Ovens

7.2.1 Description

These baking ovens are used to produce buns and muffins. Bakery products that contain yeast as an ingredient generate ethanol, a VOM, which is released during the baking process. The baking ovens do not utilize any emission control equipment. Each baking oven burns natural gas as the fuel.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity	Emission Control Equipment
02	Bun Line Natural Gas Fired Baking Oven	6.2 mmBtu/hr	None
	Muffin Line Natural Gas Fired Griddle	3.0 mmBtu/hr	None

7.2.3 Applicability Provisions and Applicable Regulations

a. The “affected ovens” for the purpose of these unit-specific conditions, are Natural Gas Fired Baking Ovens, for which construction or modification commenced on or after April 14, 1972, with a design capacity firing rate greater than 0.3 mmBtu/hr and less than 10 mmBtu/hr, and burn natural gas exclusively.

b. 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 determined by using the equation [35 IAC 212.321]:

$E = A(P)^B$

Where:

P = Process weight rate; and

E = Allowable emission rate; and,

For process weight rates up to 408 Mg/hr (450 ton/hr):

<u>Metric</u> <u>English</u>

P	Mg/hr	ton/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].

d. Each affected oven is subject to the emission limits identified in Condition 5.2.2(c).

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected ovens not being subject to 35 IAC 218.301, Use of Organic Material, because ethanol does not create any odor nuisance and ethanol is not considered as a photochemically reactive material.

b. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart TT: Other Emission Units, because bakeries are exempted from the control requirements in Subpart TT, pursuant to 35 IAC 218.980(f).

c. This permit is issued based on the affected ovens not being subject to 35 IAC Part 218, Subpart FF: Bakery Ovens, because the regulation has been repealed by operation of law and is rendered null and void and of no force and effect.

7.2.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected ovens.

7.2.6 Emission Limitations

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

Emissions from the affected ovens shall not exceed the following limits:

	VOM Emissions	
Emission Unit	(Lb/4 Week Period)	(Ton/Year)
Bun/Muffin Lines	10,000	40.0

The above limitations were established in Permit 82120046, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification

addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined on a four week period basis from the sum of the data for the current four week period plus the preceding 12 four week periods (running 13 four week period total).

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

None

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected oven to demonstrate compliance with Conditions 5.5.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

a. Bun production (ton/4 week period and ton/year);

b. Muffin production (ton/4 week period and ton/year);

c. 4 week period and annual aggregate VOM emissions, based on bun and muffin production and the applicable emission factors from Condition 7.2.12(b), with supporting calculations;

d. Records indicating development of the emission factors indicated in Condition 7.2.12(b) used to calculate VOM emissions;

e. Natural gas consumption ($mmft^3$/month and $mmft^3$/year); and

f. Monthly and annual aggregate NO_x and CO emissions from the combustion of natural gas, based on natural gas consumption and the applicable emission factors from Condition 7.2.12(c), with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of noncompliance of an affected oven with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe

the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected ovens; and

b. VOM emissions from an affected oven in excess of the emission limits specified in Condition 7.2.6, based on the current four week period's records plus the preceding 12 four week periods, within 30 days of such an occurrence.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

a. Compliance with the emission limits in Conditions 7.2.3(b), (c), and (d) is assumed to be achieved under inherent operating conditions of an affected oven, so that no compliance procedures are set in this permit addressing these requirements.

b. Compliance with the VOM emission limits in Conditions 5.5.1 and 7.2.6 from the affected ovens shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Emission Unit	Emission Factor (lb VOM/ton product)
Bun Line Baking Oven	6.44
Muffin Line Baking Oven	1.00

These are the emission factors for bread baking that were derived from Section 9.9.6, AP-42, Volume I, Supplement C, February, 1997, based on specific baking conditions.

The emission factor equation in Section 9.9.6, AP-42, was derived from USEPA's "Alternative Control Technology Document for Bakery Oven Emissions", (453/R-92-017, December, 1992).

Oven Emissions (lb) = (Bun and muffin production, ton) x (the applicable emission factor, lb/ton)

c. Compliance with the emission limits in Condition 5.5.1 from the combustion of natural gas in the affected ovens shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Pollutant	Emission Factor ($lb/mmft^3$)
NO_x	100
CO	21

These are the emission factors for uncontrolled natural gas combustion in commercial boilers (0.3 - <10 mmBtu/hr), Table 1.4-1, AP-42, Volume I, Supplement B, October, 1996.

Combustion Emissions (lb) = (Natural gas consumption, $mmft^3$) x (the applicable emission factor, $lb/mmft^3$)

7.3 Unit 03 Natural Gas Fired Boiler

7.3.1 Description

This boiler is used for the production of steam for the baking process, sanitation, and space heating. The boiler does not utilize any emission control equipment. The boiler burns natural gas as the fuel.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Rated Heat Input Capacity	Emission Control Equipment
03	Natural Gas Fired Boiler	12.6 mmBtu/hr	None

7.3.3 Applicability Provisions and Applicable Regulations

a. The “affected boiler” for the purpose of these unit-specific conditions, is a Natural Gas Fired Boiler, for which construction, modification, or reconstruction commenced before June 9, 1989, with actual heat input greater than 2.9 MW (10 mmBtu/hr) and less than 29 MW (100 mmBtu/hr), and burns natural gas exclusively.

b. No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

c. The affected boiler is subject to the emission limits identified in Condition 5.2.2(c).

7.3.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected boiler not being subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units for which construction, modification, or reconstruction was commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 MW (100 mmBtu/hr) or less, but greater than or equal to 2.9 MW (10 mmBtu/hr), 40 CFR Part 60, Subpart Dc, because the affected boiler was constructed in November 1982, and has not been modified since.

b. This permit is issued based on the affected boiler not being subject to 35 IAC 217.121, New Fuel Combustion

Emission Units, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).

c. This permit is issued based on the affected boiler not being subject to 35 IAC 218.301, Use of Organic Material, because fuel combustion emission units are not subject to 35 IAC 218.301, pursuant to 35 IAC 218.303.

7.3.5 Operational and Production Limits and Work Practices

Natural gas shall be the only fuel fired in the affected boiler.

7.3.6 Emission Limitations

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

N/A

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

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

a. Natural gas consumption (mmft^3/month and mmft^3/year); and

b. Monthly and annual aggregate NO_x, CO, and PM emissions, based on natural gas consumption and the applicable emission factors from Condition 7.3.12(b), with supporting calculations.

7.3.10 Reporting Requirements

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

The Permittee shall notify the Illinois EPA within 30 days of a change in fuel combusted in the affected boiler.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

a. Compliance with the emission limits in Conditions 7.3.3(b) and (c) is assumed to be achieved under inherent operating conditions of an affected boiler, so that no compliance procedures are set in this permit addressing these requirements.

b. Compliance with the emission limits in Condition 5.5.1 from the affected boiler shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

Pollutant	Emission Factor ($lb/mmft^3$)
NO_x	140
CO	35
PM	14

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (10 – 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, Supplement B, October, 1996.

Boiler Emissions (lb) = (Natural gas consumption, $mmft^3$) x (the applicable emission factor, $lb/mmft^3$)

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 September 18, 1999 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

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

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

a. Describe the physical or operational change;

b. Identify the schedule for implementing the physical or operational change;

c. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

d. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

e. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

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

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

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

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

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

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

iv. USEPA Region 5 - Air Branch

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

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

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

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

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

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

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

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

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

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be

submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

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

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

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

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

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

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

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

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final

action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 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: _____