

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

PERMITTEE

Marine Cleaning and Repair, LLC
Attn: Armando Sanchez
227 2nd Street
Downers Grove, Illinois 60515

Application No.: 13010009

I.D. No.: 197090ABV

Applicant's Designation:

Date Received: January 8, 2013

Subject: Liquid Barge Cleaning

Date Issued: January 29, 2014

Expiration Date: January 29, 2024

Location: 127th Street and New Avenue, Romeoville, Will County

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of:

Barge Gas Freeing/Cleaning (EQT009);

One (1) 11,000 Gallon Fixed Roof Product Storage Tank 1 (EQT001);

Two (2) 10,000 Gallon Fixed Roof Storage Tank 2 and Tank 3 (EQT002) and (EQT003);

One (1) 5,000 Gallon Fixed Roof Storage Tank 4 (EQT004);

Two (2) 3,500 Gallon Fixed Roof Storage Tank 6 and Tank 7 (EQT005) and (EQT006);

One (1) 3,000 Gallon Fixed Roof Storage Tank 9 (EQT007); and

One (1) 2,500 Gallon Fixed Roof Storage Tank 10 (EQT008);

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued:

- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for Volatile Organic Material (VOM), 10 tons/year for any single Hazardous Air Pollutant (HAP), and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- ii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- iii. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units).

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
 - c. This permit supersedes all operating permit(s) for this location.
2. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- 3a. Pursuant to 35 Ill. Adm. Code 218.122(a), no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere during the loading of any organic material from the aggregate loading pipes of any loading area having through-put of greater than 151 cubic meters per day (40,000 gallons/day) into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes or a device that is equally effective in controlling emissions and is approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108.
- b. Pursuant to 35 Ill. Adm. Code 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 liters (250 gallons), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 Ill. Adm. Code Part 201, and further processed consistent with 35 Ill. Adm. Code 218.108, or unless such tank is a pressure tank as described in 35 Ill. Adm. Code 218.121(a) or is fitted with a recovery system as described in 35 Ill. Adm. Code 218.121(b)(2).
 - c. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall only apply to photochemically reactive material.
4. This permit is issued based upon the source not being subject to the New Source Performance Standards (NSPS) for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 60 Subpart XX because the source does not receive gasoline by pipeline, ship or barge.
5. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Benzene Emissions From Benzene Transfer Operations, 40 CFR 61 Subpart BB because benzene is not loaded into tank trucks, railcars, or marine vessels at this source.

6. This permit is issued based upon the source not being subject to the Maximum Achievable Control Technology (MACT) standards and Reasonably Available Control Technology (RACT) standards of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Marine Tank Vessel Tank Loading Operations, 40 CFR 63 Subpart Y because the source does not load marine vessels. Pursuant to 40 CFR 63.561, marine tank vessel loading operation means any operation under which a commodity is bulk loaded onto a marine tank vessel from a terminal, which may include the loading of multiple marine tank vessels during one loading operation.
- 7a. This permit is issued based on the storage tanks not being subject to 35 Ill. Adm. Code 218.120 (Control Requirements for Storage Containers of VOL). Pursuant to 35 Ill. Adm. Code 218.119(a), the limitations of volatile organic liquid (VOL) with a maximum true vapor pressure of 0.5 psia or greater in any stationary tank, reservoir, or other container of 151 cubic meters (40,000 gallons) capacity or greater, except to vessels with a capacity greater than or equal to 40,000 gallons storing a liquid with a maximum true pressure of less than 0.5 psia.
- b. Pursuant to 35 Ill. Adm. Code 218.122(c), if no odor nuisance exists the limitations of 35 Ill. Adm. Code 218.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F).
- c. This permit is issued based on the storage tanks not being subject to 35 Ill. Adm. Code 218.123(b) (Petroleum Liquid Storage Tanks). Pursuant to 35 Ill. Adm. Code 218.123(a)(6) the requirements of 35 Ill. Adm. Code 218.123(b) shall not apply to any stationary storage tank volatile petroleum liquid is not stored.
- d. This permit is issued based on the solvent cleaning operations at this source not being subject to the requirements of 35 Ill. Adm. Code 218.187(b) (Other Industrial Solvent Cleaning Operations Material and Control Requirements) because no solvents are used in the cleanup operation.
- e. This permit is issued based on the source not being subject to 35 Ill. Adm. Code 218 Subpart GG (Marine Terminals) because source does not load and is not permitted to load gasoline or crude oil.
- f. This permit is issued based on the barge gas freeing operation not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart TT (Other Emission Units). This is a result of federally enforceable production and operating limitations established in this permit, which restrict the potential to emit for VOM from emissions units not included within the categories specified in 35 Ill. Adm. Code 218 Subparts B or E to less than 25 tons per year.
- 8a. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to

minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.

- b. All liquid residual material must be removed from barge before venting commences.
- c. This permit is issued based on no transfer or handling of gasoline occurring at this source. The transfer or handling of gasoline at this source will require that the Permittee first obtain a construction permit from the Illinois EPA and the demonstration of compliance with all applicable requirements.
- 9a. Emissions from and operation of barge venting system and storage tanks shall not exceed the following limits:

<u>Emission Unit</u>	<u>VOM Emissions</u>		<u>Single HAP</u>		<u>Combination HAP</u>	
	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
Barge Gas Freeing/ Cleaning	1.98	19.73	0.78	7.81	1.98	19.70
Eight Product Storage Tanks	0.02	<u>0.17</u>	0.01	<u>0.09</u>	0.16	<u>0.20</u>
Total:		<u>19.90</u>		<u>7.90</u>		<u>19.90</u>

These limits are based on the maximum equipment operation, maximum emissions, and standard emission estimation procedures (Section 5.2, AP-42, Fifth Edition, Volume I, July 2008 for barge gas freeing/cleaning and Section 7.1, AP-42 Fifth Edition, Volume I, November 2006 or TANKS Emissions Estimation Software, Version 4.09D, October 5, 2006 for collection of residual materials in storage tanks). VOM emissions from barge ventilation shall be determined from Equation 1 of Section 5.2, AP-42, as follows:

$$L_L = 12.46 \times (S P M) / (460 + T)$$

where:

L = Loading loss rate in lbs VOM/1,000 gallons throughput;

S = Saturation Factor (0.5 for Barges);

P = True Vapor Pressure of Liquid Loaded (psia);

M = Molecular Weight of Liquid Loaded (lbs/lb-mole); and

T = Temperature of Liquid Loaded (°F)

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

10. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
11. Pursuant to 35 Ill. Adm. Code 218.129(f), the owner or operator of each storage vessel specified in 35 Ill. Adm. Code 218.119 shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel. Each storage vessel with a design capacity less than 40,000 gallons is subject to no provisions of 35 Ill. Adm. Code Part 218 other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
- 12a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Design information for the transfer systems showing the presence of a permanent submerged loading pipes;
 - ii. Maintenance and repair records for the tanks, as related to the repair or replacement of the loading pipes;
 - iii. Identification of material type and throughputs for each such material handled at the source (gallons/month and gallons/year);

- iv. Barge Ventilation emission factor calculation (lbs VOM/1,000 gallons throughput); and
 - v. Monthly and annual emissions of VOM and HAPs with supporting calculations (tons/month and tons/year).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
13. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.
- 14a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

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

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If you have any questions on this, please call Mike Dragovich at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

RWB:MJD:psj

cc: Illinois EPA, FOS Region 1
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the barge gas freeing operation operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons/year for VOM, 10 tons/year for any single HAP, and 25 tons/year for any combination of such HAPs) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	Single <u>HAP</u>	Total <u>HAPs</u>
Barge Gas Freeing/Cleaning	19.73	7.81	19.70
Eight Product Storage Tanks	<u>0.17</u>	<u>0.09</u>	<u>0.20</u>
Totals	19.9	<u>7.90</u>	19.90