

217/782-2113

CONSTRUCTION PERMIT - NSPS SOURCE

PERMITTEE

Robbins Community Power LLC
Attn: Edward C. Kalebich
13400 South Kedzie Avenue
Robbins, Illinois 60472

Application No.: 07060081

I.D. No.: 031270AAB

Applicant's Designation: WOOD COMBUSTOR

Date Received: August 17, 2007

Subject: Wood-Fueled Power Plant

Date Issued: June 23, 2008

Location: 13400 South Kedzie Avenue, Robbins

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a wood-fired power plant, two wood-fired boilers, each with fluidized bed staged combustion, overfire air, flue gas recirculation, a spray dryer absorber (SDA), a selective non-catalytic reduction (SNCR) system, an oxidation catalyst and baghouse, associated wood and ash storage and handling systems with baghouses, several small process space and comfort heating systems, and other ancillary operations, as described in the above-referenced application. This Permit is granted based upon and subject to the findings and standard conditions attached hereto, and the following conditions.

If you have any questions on this permit, please call Bob Smet at 217/782-2113.

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

Date Signed: _____

ECB:RPS:psj

cc: Region 1
USEPA Region V

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FINDINGS

- 1a. Robbins Community Power, LLC (RCP) has requested a permit for a wood fired power plant with a nominal rated capacity of 55 MW. The proposed plant would have two circulating fluidized bed (CFB) boilers, each nominally rated at 395 million Btu/hour (mmBtu/hour). The boilers would be equipped with selective noncatalytic reduction (SNCR), an oxidation catalyst, a spray dryer absorber and a baghouse. The steam from the boilers will generate electricity in a steam turbine. Ancillary operations would include wood handling and storage; ash handling and storage; cooling tower; and other ancillary operations.
- b. The two boilers would be fired on wood as the primary fuel. Natural gas will be used as an auxiliary fuel for startup, with burner rated at 120 mmBtu/hour. The design wood fuel will nominally have 7,050 Btu per pound higher heating value (HHV). The wood fuel could be supplemented with biomass fuels such as switchgrass or corn stover.
2. The plant would be located in an area that is currently designated nonattainment for ozone and PM_{2.5} and attainment for all other criteria pollutants.
3. The proposed plant will not be a major source under the PSD rules. This is because the plant, as indicated in the application, would not have the potential to emit 250 tons per year or more of any PSD pollutant, where 250 tons per year is the applicable major source threshold under the PSD rules. (Refer to Table I for the potential emissions from the boilers.) For this purpose, this permit is issued based on the two wood-fired boilers not being in one of the 28 categories of sources for which the major source threshold under the PSD rules is 100 tons per year. This is because the plant and boilers are being developed to burn wood and the natural gas fired burners in each boiler will only have a rated capacity of 120 mmBtu/hour, which is consistent with their role as auxiliary burners.
4. The proposed plant is a major source for emissions of NO_x under Illinois's rules for Major Stationary Sources Construction and Modification (MSSCAM), 35 IAC Part 203. This is because the plant would be located in an area that is designated nonattainment for ozone and, as indicated in the application, would have potential annual emissions of NO_x that are in excess of 100 tons. Although the source will be located in an area that is nonattainment for PM_{2.5}, the source will not be major for emissions of PM.
5. The proposed plant is not a major source for emissions of hazardous air pollutants (HAP), e.g., the potential HAP emissions from the plant will not be 10 tons per year or more of an individual HAP, such as hydrogen chloride and hydrogen fluoride. Therefore, the plant is not being subjected to case-by-case review under Section 112(g) of the Clean Air Act.

- 6a. After reviewing the materials submitted by RCP, the Illinois EPA has determined that the project will (i) comply with applicable Board emission standards (ii) comply with applicable federal emission standards, and (iii) achieve the Lowest Achievable Emission Rate (LAER) for emissions of NO_x as required by 35 IAC Part 203.
- b. The determination of LAER made by the Illinois EPA for the proposed plant is the control technology determination contained in the permit conditions for specific emission units. For this purpose, limits related to NO_x emissions constitute LAER.
- c. The permit also contains determinations of Best Available Control Technology (BACT) for the boilers for certain pollutants, including hazardous air pollutants (HAPs).
- 7a. As a major project for emissions of NO_x under MSSCAM, 35 IAC Part 203, RCP must obtain NO_x emission offsets at a ratio of 1.15 to 1 for its permitted emissions of NO_x. (Refer to Condition 1.4.)
- b. The air quality analysis submitted by RCP and reviewed by the Illinois EPA also shows that the proposed project will not cause violations of the ambient air quality standards for NO₂, SO₂, PM₁₀, and CO. The air quality analysis shows compliance with the allowable increments for NO_x and PM₁₀ established under the PSD regulations.
8. The analysis of alternatives to the project submitted by RCP shows that the benefits of the proposed plant, which would utilize existing boilers and other facilities at a plant formerly operated by Robbins Resource Recovery outweigh the potential impacts of its emissions of NO_x, as required by 35 IAC 203.306. The analysis of alternatives conducted by the Illinois EPA also found that benefits of the plant would outweigh potential impacts.
9. The Illinois EPA has determined that the application for proposed plant complies with all applicable Illinois Pollution Control Board Air Pollution Regulations and applicable federal New Source Performance Standards (NSPS), 40 CFR 60.
10. In conjunction with the issuance of this construction permit, the Illinois EPA is also issuing a separate Acid Rain permit for the proposed boilers, to address requirements of the federal Acid Rain program. These boilers would be affected units under the Acid Rain Deposition Control Program pursuant to Title IV of the Clean Air Act. As affected units under the Acid Rain Program, RCP must hold SO₂ allowances each year for the actual emissions of SO₂ from the boilers. The boilers are also subject to emissions monitoring requirements pursuant to 40 CFR Part 75.
11. A copy of the application, the project summary prepared by the Illinois EPA, a draft of this construction permit, and a draft of the Acid Rain permit was placed in public locations near the plant, and the public was given notice and an opportunity to examine this material and to participate in a public hearing and to submit comments on these matters.

SECTION 1: SOURCE-WIDE CONDITIONS

1.1 Authorization for Construction

- a. This permit shall become invalid if construction of the plant is not commenced within 18 months after this permit becomes effective, if construction of the plant is discontinued for a period of 18 months or more, or if construction of the plant is not completed within a reasonable period of time. This condition supersedes Standard Condition 1.
- b. For purposes of this provision, the definitions of "construction" and "commence" at 40 CFR 52.21 (b)(8) and (9) shall apply, which requires that a source must enter into a binding agreement for on-site construction or begin actual on-site construction. (See also the definition of "begin actual construction," 40 CFR 52.21 (b)(11)).

1.2 Emission Limitations

The emissions from the plant shall not exceed the limitations in Table I.

1.3 Applicability of Requirements for Local Approval of Siting

- a. i. This permit is issued based on the proposed plant not constituting a "pollution control facility", as defined by Section 3.330 of the Environmental Protection Act, so that local siting approval pursuant to Section 39.2 of the Act was not required before issuance of this permit for construction of the proposed plant. In particular, the proposed plant is exempted from local siting approval by Section 3.330(a)(16) of the Act as a facility that previously obtained local siting approval and that will only burn wood fuel as included in a fuel specification approved by the Illinois EPA (See also Condition 2.1.5-1(b)).
- ii. This permit is issued based on the plant being a separate source from the transfer station operated by Allied Waste at the same address.

1.4 Emissions Offsets

- a. The Permittee shall maintain 278 tons of NO_x emission offsets generated by other sources in the Chicago ozone nonattainment area such that the total is 1.15 times the permitted NO_x emissions of the plant.
- b. i. This NO_x emission reduction credit is provided by permanent emission reductions that occurred at the following source, as identified below. These emission reductions have been relied upon by the Illinois EPA to issue this permit and cannot be used as emission

reduction credits for other purposes. The reductions at the source identified below have been made enforceable by the reduction in netted allowable emissions of the air pollution control permits for the units generating the permanent emission reductions.

Corn Products International, Bedford Park
Reduction in NO_x Emissions 278 tons/year NO_x

- ii. If the Permittee proposes to rely upon emission offsets from another source, the Permittee shall apply for and obtain a revision to this permit prior to relying on such emission offsets, which application shall be accompanied by detailed documentation for the nature and amount of those alternative emission offsets.
- c. The acquisition of emission offsets shall be completed prior to commencement of construction of the plant.

1.5 Emissions of Hazardous Air Pollutants

- a. This permit is issued based on the proposed plant not being a major source for emissions of hazardous air pollutants (HAP), because the potential HAP emissions from the project will be less than 10 tons of an individual HAP, and 25 tons of total HAPs. Since this plant will not be a major source of hazardous air pollutants (HAP), the provisions of 40 CFR Part 63, and Section 112(g) of the Clean Air Act will not apply. Therefore a case-by-case determination of Maximum Achievable Control Technology (MACT) for emissions of HAP from the proposed plant is not required for the units that are part of this project.
- b. The plant's emissions of hazardous air pollutants (HAPS) shall not exceed the following limitations:
 - i. Emissions of formaldehyde shall not exceed 1.74 pounds/hour and 7.7 tons/year.
 - ii. Emissions of any individual HAP, other than formaldehyde, shall not exceed 1.0 pounds per hour and 4.4 tons per year.
 - ii. Emissions of all HAPs, in aggregate, shall not exceed 4.8 pounds per hour and 21.0 tons per year.

1.6 Emission Standards of General Applicability

In addition to other applicable regulations, the emission units at the plant are subject to the following state emission standards of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer

looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

- b. 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.

- f. The Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9 for units at the plant that it conducts or that are conducted at its behest by individuals who are qualified to make such observations. For each occasion on which such measurements are made, these records shall include the formal report for the measurements if conducted pursuant to any Condition of this permit, the identity of the observer, a description of the measurements that were made, the operating condition of the affected unit, the observed opacity, and copies of the raw data sheets for the measurements.

1.7 Requirements for Miscellaneous Ancillary Equipment

- a.
 - i.
 - A. Diesel engines shall only be used as emergency equipment, as defined at 35 IAC 211.1920.
 - B. The power output of each engine shall be no more than 1,500 horsepower.
 - C. Ultra-low sulfur diesel shall be the only fuel oil fired in the main fire water pump engine and other diesel engines.
 - D. Operation of each engine shall not exceed 100 hours per year, provided, however, that the Illinois EPA may authorize temporary operation of engine(s) in excess of 500 hours per year to address extraordinary circumstances that require operation of engine(s), by issuance of a separate State construction permit addressing such circumstances.
 - ii.
 - A. The water storage tank heater and other heaters at the plant shall only be fired on natural gas.
 - B. The water storage tank heater shall be equipped with ultra low-NO_x burners, designed to minimize emissions of NO_x to a rate not to exceed 0.037 lb/mmBtu.
 - C. This permit is issued based on negligible emissions of NSR pollutants from the water storage tank heater and other heaters. For this purpose, emissions of

each pollutant from the water storage tank heater and other heaters each shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

- iii. This permit is issued based on negligible emissions of NSR pollutants from the hydraulic reservoirs. For this purpose, emissions of each pollutant shall for each not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
- iv. This permit is issued based on negligible emissions of NSR pollutants from the vehicle fuel and sodium hydroxide storage tanks. For this purpose, emissions of each pollutant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.

Note: These requirements constitute the determination of LAER for miscellaneous ancillary equipment, as required by MSSCAM.

- b.
 - i. The ancillary equipment shall comply with all applicable emission standards and control requirements of applicable federal New Source Performance Standards (NSPS), 40 CFR Part 60, including the NSPS for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII, for the engines at the plant.
 - ii. The ancillary equipment shall comply with all applicable emission standards and control of requirements of applicable state emission regulations at Title 35, Subtitle B, Chapter I, Subchapter c.
 - iii. The Permittee shall fulfill applicable requirements of applicable regulations, including provisions for testing, monitoring, recordkeeping, notification and reporting.
- c. The rated heat input capacity of the water tank storage heater shall not exceed 3.8 mmBtu/hour.
- d. Diesel-fueled nonroad equipment at the plant operated by the Permittee shall only use ultra low sulfur diesel fuel.

1.8 Compliance with Annual Limitations

- a. Unless otherwise specified in a particular provision of this permit, compliance with annual limitations established by this permit shall be determined from a running total of 12 months of data, i.e., from the sum of the data for the current month plus the preceding 11 months (12 month total).

1.9 Good Air Pollution Control Practices

The Permittee shall operate and maintain the emission units at this plant, including associated air pollution control equipment, in a

manner consistent with good air pollution control practice, as follows:

- a. At all times, including periods of startup, shutdown, malfunction or breakdown, operate as practicable to minimize emissions.
- b. Conduct routine inspections and perform appropriate maintenance and repairs to facilitate proper functioning of equipment and minimize or prevent malfunctions and breakdowns.
- c. Install, calibrate and maintain required monitoring devices and instrumentation in accordance with good monitoring practices, following the manufacturer's recommended operating and maintenance procedures or such other procedures as otherwise necessary to assure reliable operation of such devices.

1.10 Records for Required Monitoring Systems and Instrumentation

The Permittee shall keep records of the data measured by required monitoring systems and instrumentation. Unless otherwise provided in a particular condition of this permit, the following requirements shall apply to such recordkeeping:

- a. For required monitoring systems, data shall be automatically recorded by a central data system, dedicated data logging system, chart recorder or other data recording device. If an electronic data logging system is used, the recorded data shall be the hourly average value of the particular parameter for each hour. During periods when the automatic recording device is out of service, data shall be recorded at least once per shift for periods when the associated emission unit(s) are in service.
- b. For required instrumentation, the measured data shall be recorded manually at least once per day, unless otherwise specified, with data and time both recorded, for periods when the associated emission unit(s) are in service, provided however that if data from an instrument is recorded automatically, the above provisions for recording of data from monitoring systems shall apply.

1.11 Records of Opacity Measurements

- a. The Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9 for emission units at the plant that it conducts or that are conducted on its behalf by individuals who are qualified to make such observations. For each occasion on which such measurements are made, these records shall include the formal report for the measurements if conducted pursuant to this permit or a request from the Illinois EPA, or otherwise the identity of the observer, a description of the measurements that were made, the operating

condition of the affected operations, the observed opacity, and copies of the raw data sheets for the measurements.

1.12 Retention and Availability of Records

- a. Except as specified in a particular provision of this permit or as superseded in a subsequent CAAPP Permit, the Permittee shall keep all records required by this permit, including written procedures and logs, at a readily accessible location at the plant for at least five years and shall make such records available for inspection and copying upon request by the Illinois EPA and USEPA.
- b. Upon written request by the Illinois EPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the Illinois EPA. For this purpose, material shall be submitted to the Illinois EPA within 30 days unless additional time is provided by the Illinois EPA or the Permittee believes that the volume and nature of requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule of the requested material.

1.13 General Reporting Requirements

- a. On an annual basis after the plant begins operation, the Permittee shall submit an Annual Emission Report to the Illinois EPA not later than May 1 of the following year to address emission during each calendar year, as required by 35 IAC Part 254. For this notwithstanding general requirements for submittal of reports, only a single copy of this report needs to be submitted to the Illinois EPA.
- b. Until a CAAPP Permit is issued for the plant, the terms and conditions of this construction permit shall be addressed in an annual compliance certification submitted by the Permittee by May 1 of the following year to address operation in each calendar year, as if a CAAPP permit were issued for the plant.

1.14 Submission of Notifications and Reports

- a. Any reports and notifications required by this permit shall be sent to the Illinois EPA at the following address unless otherwise indicated:

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

- b. A copy of these reports and notifications, shall also be sent directly to the Illinois EPA's regional office at the following address:

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

- c. A copy of these reports and notifications concerning emission testing and initial installation and certification of continuous emission monitoring systems (CEMS) shall also be sent directly to the Illinois EPA's Source Monitoring Unit at the following address:

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

1.15 Effect of Permit

- a. This permit does not relieve the Permittee of the responsibility to comply with all Local, State and Federal Regulations which are part of the applicable Illinois State Implementation Plan, as well as all other applicable Federal, State and Local requirements.
- b. In particular, this permit does not relieve the Permittee from the responsibility to carry out practices during the construction and operation of the plant, such as application of water or dust suppressant or vacuum sweeping of roadways, as necessary to minimize fugitive dust and prevent an air pollution nuisance from fugitive dust, as prohibited by 35 IAC 201.141.

1.16 Authorization to Operate

- a.
 - i. Under this permit, each boiler and all associated equipment may be operated for a period that ends 180 days after initial startup of the boiler to allow for equipment shakedown and required emissions testing. This period may be extended by Illinois EPA upon request of the Permittee if additional time is needed to complete shakedown or perform emission testing. This condition supersedes Standard Condition 6. (See Attachment 2)
 - ii. Upon successful completion of emission testing of a boiler demonstrating compliance with applicable requirements or limitations, the Permittee may continue to operate the boiler unit as allowed by Section 39.5(5) of the Environmental Protection Act.

- b.
 - i. The remainder of the plant, other than the above units, may be operated under this construction permit for a period of 365 days after initial startup of the first boiler. This period of time may be extended by the Illinois EPA for up to an additional 365 days upon written request by the Permittee as needed to reasonably accommodate unforeseen difficulties experienced during shakedown of the plant. This condition supersedes Standard Condition 6. (See Attachment 2)
 - ii. Upon successful completion of applicable emission testing demonstrating compliance with applicable requirements or limitations, the Permittee may continue to operate the remainder of the plant as allowed by Section 39.5(5) of the Environmental Protection Act.

SECTION 2: UNIT-SPECIFIC CONDITIONS

CONDITION 2.1: UNIT-SPECIFIC CONDITIONS FOR THE BOILERS

2.1.1 Description

The two circulating fluidized bed, wood-fired boilers, each nominally rated at 395 mmBtu/hour, would supply steam for operation of a single 55 MW turbine-generator, which will supply electricity to the grid. Natural gas would be used as the auxiliary fuel for the boilers.

The emissions from the boilers will be controlled by low-NO_x combustion technology, good combustion practices and a multi-stage control system.

2.1.2 Control Technology Determination

a. Emissions from each affected boiler shall be controlled by the following:

- i. Low-NO_x combustion technology (staged combustion and advanced combustion controls, overfire air and flue gas recirculation);
- ii. Selective non-catalytic reduction (SNCR) system;
- iii. Good combustion practices;
- iv. Oxidation catalyst system;
- v. Spray dryer absorber; and
- vi. Baghouse.

- b. i. Emissions of NO_x from each affected boiler shall not exceed 0.070 lb/mmBtu (24-hour daily average).
- ii. Notwithstanding the above, during a 24-hour period in which a boiler undergoes a cold startup or two or more hot startups, the emissions of NO_x from the boiler shall not exceed 0.20 lb/mmBtu.

c. Emissions of SO₂ and PM from each affected boiler shall not exceed the following limits.

Pollutant	Emission Limit (Lbs/mmBtu)	Averaging Time
Sulfur Dioxide (SO ₂)	0.0114	24-Hour Daily Average
PM (Filterable)	0.0120	3-Hour Block Average

d. Emissions of HAPs from each affected boiler shall not exceed the limits specified in Table II.

2.1.3-1 Applicable Federal Emission Standards

- a. The affected boilers are subject to the NSPS for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db and applicable provisions in 40 CFR 60, Subpart A, General Provisions. Each boiler shall comply with applicable emission standards on and after the date on which the initial performance test is completed or is required to be completed under 40 CFR 60.8, whichever date comes first:
- b. Pursuant to the NSPS, each affected boiler shall comply with the following standards:
 - i. Opacity shall not exceed 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity pursuant to 40 CFR 60.43b(f). This standard shall apply at all times, except during periods of startup, shutdown or malfunction as provided by 40 CFR 60.2 and 60.11(c).
 - ii. PM emissions (filterable only) shall not exceed 13 ng/J per actual heat input in any one hour period (0.030 lb/million Btu), pursuant to 40 CFR 60.43b(h)(1), except during periods of startup, shutdown or malfunction as provided by 40 CFR 60.2 and 60.11(c).
 - iii. NO_x emissions shall not exceed 130 ng/J (0.30 lb/million Btu) heat input on a 30-day rolling average, pursuant to 40 CFR 60.44b(d).
 - iv. SO₂ emissions shall not exceed 87 ng/J (1.4 lbs/million Btu) or 95 percent removal of the potential SO₂ emission rate, on a 30-day rolling average, pursuant to 40 CFR 60.42b(i)(1).
- c. At all times, the Permittee shall operate and maintain the affected boilers, including the associated control system, in a manner consistent with good air control practice, as required by the NSPS, 40 CFR 60.11(d).

2.1.3-2 Applicable State Emission Standards

- a. Each affected boiler is subject to the following state emission standards:
 - i. The emission of smoke or other particulate matter shall not have an opacity greater than 20 percent, except as allowed by 35 IAC 212.122(b) and 212.124. Compliance with this limit shall be determined by 6-minute averages of opacity measurements in accordance with USEPA Reference Method 9. [35 IAC 212.109 and 212.122(a)]
 - ii. The emission of CO shall not exceed 200 ppm, corrected to 50 percent excess air. [35 IAC 216.121]

- iii. The emissions of NO_x shall not exceed 0.7 lb/mmBtu in any one-hour period. [35 IAC 217.121(d)]
 - iv. The emissions of SO₂ shall not exceed 1.2 lbs/mmBtu in any one-hour period. (35 IAC 214.121)
 - v. The emissions of PM (filterable only) shall not exceed 0.1 lb/mmBtu in any one-hour period. (35 IAC 212.204)
- b. Pursuant to 35 IAC 201.149, 201.161 and 201.262 the Permittee is authorized to operate an affected boiler in violation of the applicable standards in 35 IAC 216.121 and 217.121 (Condition 2.1.3-3(a)(ii) and (iii)) during startup. This authorization is subject to the following terms and conditions.
- i. This authorization does not relieve the Permittee from the continuing obligation to demonstrate that all reasonable efforts are made to minimize startup emissions, duration of individual startups and frequency of startups.
 - ii. The Permittee shall conduct startup of the affected boilers in accordance with a Startup, Shutdown and Malfunction Plan, as further addressed by Condition 2.1.5-3.
 - iii. The Permittee shall fulfill applicable recordkeeping and reporting requirements of Conditions 2.1.9-2(d) and 2.1.10(d)(iv).
 - iv. As provided by 35 IAC 201.265, an authorization in a permit for excess emissions during startup does not shield a Permittee from enforcement for any violation of applicable emission standard(s) that occurs during startup and only constitutes a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all terms and conditions connected with such authorization.
- c. Pursuant to 35 IAC 201.149, 201.161 and 201.262, the Permittee is authorized to continue operation of an affected boiler in violation of the applicable limit of 35 IAC 216.121 and 217.121 (Condition 2.1.3-2(a)(ii) and (iii)) in the event of a malfunction or breakdown of the boiler. This authorization is subject to the following terms and conditions:
- i. This authorization only allows such continued operation as necessary to prevent risk of injury to personnel or severe damage to equipment, provided however, that operation shall not continue solely for the economic benefit of the owner or operator of the plant. As provided by 35 IAC 201.265, this authorization does not shield the source from enforcement for any such violation

and shall only constitute a prima facie defense to such an enforcement action.

- ii. The Permittee shall operate the boiler in accordance with a Startup, Shutdown and Malfunction Plan, as further addressed by Condition 2.1.5-3.
- iii. Upon occurrence of excess emissions due to malfunction or breakdown, the Permittee shall as soon as practicable, repair the affected boiler or remove the boiler from service, so that excess emissions cease. For this purpose, if the Permittee has operated and maintained the affected boiler and air pollution control equipment so that malfunctions are infrequent, sudden, and not caused by poor maintenance or careless operation, and in general are not preventable, the Permittee shall begin shutdown of the boiler within 2 hours unless the malfunction is expected to be repaired within 12 hours. In such case, the shutdown of the system shall be undertaken when it is apparent that the repair will not be accomplished within 12 hours.
- iv. The Permittee shall fulfill applicable recordkeeping and reporting requirements of Conditions 2.1.9-2(d) and 2.1.10(c).
- v. Following notification to the Illinois EPA of a malfunction or breakdown that resulted in excess emissions, the Permittee shall comply with all reasonable directives of the Illinois EPA with respect to such incident, pursuant to 35 IAC 201.263.

- 2.1.3-3 a. The Permittee shall comply with applicable requirements of Title IV of the Clean Air Act, Acid Deposition Control and regulations thereunder for the affected boilers. In particular, the Permittee shall retire SO₂ allowances for the SO₂ emissions of the affected boilers and the Permittee shall conduct emissions monitoring for NO_x, SO₂ and opacity in accordance with 40 CR Part 75.
- b. The Permittee shall comply with applicable requirements of the NO_x and SO₂ Allowance Programs for Electrical Generating Units, 35 IAC Part 225, Subparts C, D and E, for the affected boilers. In particular, the Permittee shall retire allowances for the NO_x and SO₂ emissions of the boilers during each calendar year and seasonal control period (NO_x only) and shall conduct operational monitoring for the electrical output of the associated generator.

2.1.4 Non-Applicability of Regulations of Possible Concern

- a. This permit is issued based on the affected boilers not being subject to the NSPS for Electric Utility Steam Generating Units for which construction is commenced after September 18, 1978,

40 CFR Part 60, Subpart Da, since each boiler is not capable of combusting more than 250 mmBtu/hour heat input of fossil fuel.

- b. This permit is issued based on the affected boilers not being subject to various emission standards for incinerators, e.g., 40 CFR 60 Subparts Eb or Ec or 35 IAC 212.181, because the boilers are fired on fuel material and do not burn waste as defined by 40 CFR Part 60 or the Environmental Protection Act.

2.1.5-1 Requirements for the Fuel Supply to the Affected Boilers

- a.
 - i. This Permit does not authorize acceptance of fuel by the Permittee that would qualify as acceptance of waste under the provisions of the Environmental Protection Act or acceptance of hazardous waste under the provisions of the Federal Resource Conservation, the Recovery Act, Environmental Protection Act, or 35 IAC Part 721.
 - ii. This Permit does not authorize processing of fuel feedstocks at the plant to produce fuel, e.g., processing of mixed construction and demolition debris to select clean wood. This does not prohibit final preparation of fuel for use as typically occurs with use of solid fuel, e.g., by final size adjustment and additional magnetic screening for tramp metal in the fuel.
- b. The Permittee shall only accept wood fuel that has been processed in accordance with the Wood Fuel Quality Control Plan prepared by the Permittee and approved by Illinois EPA, which is included in Attachment 3 of this permit.

Note: The fuel specification established by the Illinois EPA for the wood material accepted and used as fuel at the plant is that the material comply with and have been prepared and accepted in accordance with this plan, which plan also serves to ensure that the plant does not receive or process waste material.

- c.
 - i. For the purpose of this permit, biomass means a fuel such as switchgrass, corn stover or other similar vegetative material that is grown and/or harvested from agricultural operations for the purpose of use as fuel or recovered from grain processing plants. Biomass does not include waste, e.g., vegetative material that has been discarded.
 - ii. The Permittee shall only accept biomass from suppliers that are addressed in the records required by Condition 2.1.9-1(b).
 - iii. The Permittee shall only accept shipments of biomass in which the biomass is clean, that is, the biomass as unloaded at the plant is free of foreign matter and any contaminants that would adversely impact the environment when the Permittee uses the biomass as fuel.

- iv. The Permittee shall carry out the acceptance of biomass in a manner that ensures that accepted biomass satisfies all applicable criteria for such material.
- v. The Permittee shall implement appropriate practices given the nature of particular biomass materials to store and otherwise manage accepted biomass so that it does not degrade or is otherwise damaged such that it can no longer be used as fuel.
- d. The Permittee shall handle all solid fuel at the plant in accordance with a Fuel Management Plan that is developed and maintained by the Permittee and specifies the practices that will be implemented to store and handle solid fuel so that storage and handling of fuel is not a source of nuisance dust, odor or litter. The Permittee shall make changes to this Plan if necessary to satisfy the requirements of this permit or address changes to the solid fuel supply for the boilers or if required by the Illinois EPA. This Plan is a record required by this permit, which the Permittee must retain in accordance with the general requirements for retention and availability of records. In addition, when the Permittee revises the Plan, the Permittee must also retain and make available the previous version of the Plan for a period of at least 5 years after such revision.

2.1.5-2 Operational Limitations for the Boiler

- a.
 - i. The rated heat input capacity of each affected boiler shall not exceed 395 mmBtu/hour, total.
 - ii. The rated heat input capacity of the natural gas burners of each affected boiler shall not exceed 120 million Btu/hour, total.
- b. The usage of solid fuel in the affected boilers shall not exceed 492,000 tons years (equivalent to 6,930,000 million Btu/year, for fuel with a nominal heat content of 7,050 Btu/pound).

2.1.5-3 Work Practice requirements for the Boilers

- a. For the affected boilers, the Permittee shall develop, implement, and maintain a written Startup, Shutdown, and Malfunction Plan (SSM Plan) that describes, in detail, its procedures for operating and maintaining the affected boilers during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process, and air pollution control and monitoring equipment used to comply with the relevant emission standards and limits. This SSM Plan shall be developed to satisfy the purposes set forth in 40 CFR 63.6(e)(3)(i)(A), (B) and (C). For this purpose and other conditions of this permit for which the regulatory definitions

of the terms "startup," "shutdown" and "malfunction" under the NSPS are not applicable, the definitions of the terms "startup," "shutdown" and "malfunction" under the NESHAP, at 40 CFR 63.2, shall apply and be used. In addition, as related to the scope of the Startup Shutdown and Malfunction Plan, the term "malfunction" shall also address and apply to failures of equipment that could reasonably be preventable and that may be attributable to poor maintenance or careless operation, and shall not be restricted to malfunctions as defined by 40 CFR 63.2. Similarly, requirements for recordkeeping, notification and reporting related to malfunctions shall be applicable for failures of equipment irrespective of the cause of such failure.

Note: Although the plant is not a major source of HAPs for purposes of Section 112 of the Clean Air Act, this permit refers to provisions of the federal NESHAP to establish appropriate work practices for the startup, shutdown and malfunction of the affected boilers.

- b. At all times, including periods of startup, shutdown, and malfunction as defined at 40 CFR 63.2, the Permittee shall operate and maintain the affected boilers, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by the relevant standards and limits, i.e., meet the emission standard(s) or comply with the applicable SSM Plan, as required below. Determination of whether such operation and maintenance procedures are being used will be based on available information, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM Plan), review of operation and maintenance records, and inspection of the unit. [Reflects 40 CFR 63.6(e)(1)(i)]
- c.
 - i. During periods of startup, shutdown, and malfunction of a boiler, the Permittee shall operate and maintain each affected boiler, including associated air pollution control and monitoring equipment, in accordance with the procedures specified in the SSM Plan. The Permittee shall correct malfunctions as soon as practicable after their occurrence in accordance with the SSM Plan. To the extent that an unexpected event arises during a startup, shutdown, or malfunction, the Permittee shall comply by minimizing emissions during such a startup, shutdown, and malfunction event consistent with safety and good air pollution control practices. [Reflects 40 CFR 63.6(e)(1)(ii) and (3)(ii)]
 - ii. When actions taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in SSM Plan, the Permittee shall keep records

for that event which demonstrate that the procedures specified in the SSM Plan were followed. In addition, the Permittee shall keep records of these events as specified in 40 CFR 63.10(b), including records of the occurrence and duration of each startup, shutdown, or malfunction of operation and each malfunction of the air pollution control and monitoring equipment. Furthermore, the Permittee shall confirm in the periodic compliance reports (refer to Condition 2.1.10(d)) that actions taken during periods of startup, shutdown, and malfunction were consistent with the SSM Plan. [Reflects 40 CFR 63.6(e)(3)(iii)]

iii. If an action taken by the Permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) of a boiler is not consistent with the procedures specified in the SSM Plan, and the boiler exceeds a relevant emission standard or limit, then the Permittee must record the actions taken for that event and must promptly report such actions as specified by 40 CFR 63.10(d)(5), unless otherwise specified elsewhere in this permit or when superseded in the CAAPP Permit. [Reflects 40 CFR 63.6(e)(3)(iv)]

d. i. The Permittee shall develop its initial SSM Plan prior to the initial startup of the affected boilers. The Permittee shall make changes to the SSM Plan if required by the Illinois EPA or necessary to satisfy the requirements of this permit or address other changes to the procedures for the boilers. [Reflects 40 CFR 63.6(e)(3)(vii) and (viii)]

ii. This SSM Plan is a record required by this permit, which the Permittee must retain in accordance with the general requirements for retention and availability of records. In addition, when the Permittee revises the SSM Plan, the Permittee must also retain and make available the previous (i.e., superseded) version of the SSM Plan for a period of at least 5 years after such revision. [Reflects 40 CFR 63.6(e)(3)(v) and 40 CFR 63.10(b)(1)]

2.1.6 Emission Limitations

The emissions of the affected boilers shall not exceed the limits in Table II.

2.1.7-1 Testing Requirements

a. i. Within 60 days after achieving the maximum rate at which each affected boiler will be operated, but not later than 180 days after initial startup, the Permittee shall have tests conducted for its emissions of pollutants for which limits are set by Condition 2.1.2(b) or 2.1.6 and metals, as specified below, at its expense by an approved testing

service while the affected boiler is operating in the maximum load range and other representative operating conditions.

Note: For emission testing required by the NSPS, an extension of this timing for testing can only be provided by USEPA.

- ii. To confirm continuing compliance, the Permittee shall again have emission testing conducted for each boiler as specified above, for pollutants other than NO_x, CO, SO₂ and CO, between 15 and 24 months after the initial emission tests are completed.
 - iii. In addition to the emission testing required above, the Permittee shall have testing performed as specified by the Illinois EPA within 45 days of a written request by the Illinois EPA or such later date agreed to by the Illinois EPA.
- b. Applicable USEPA test methods and procedures shall be used for testing emissions of the affected boilers, including the following methods unless another method is approved by the Illinois EPA.

Nitrogen Oxides ¹	Method 7, 7E or 19
Carbon Monoxide ¹	Method 10
Sulfur Dioxide ¹	Method 6C or 19
Volatile Organic Material ³	Method 18, 25 and/or 25A
PM ₁₀ (Filterable) ²	Method 5 and 201 or 201A
PM ₁₀ (Condensable)	Method 202
PM _{2.5} (Filterable)	Conditional Test Method 040
Lead, Mercury and Other Metals ⁴	Method 29 or Draft ASTM Z65907
Sulfuric Acid Mist (H ₂ SO ₄)	Method 8
Hydrogen Chloride (HCl)	Method 26
Organic Compounds ⁵	Method 18 and 23
Formaldehyde	Method 18 or 316 (proposed)

Notes:

- ¹ Testing shall be conducted in accordance with the certification of the required continuous emissions monitoring systems (CEMS) as specified by 40 CFR 60.11 and 60.48b(d).
- ² The Permittee may report all PM emissions measured by USEPA Method 5 as filterable PM₁₀, in which case separate testing using USEPA Method 201 or 201A need not be performed.
- ³ The Permittee may exclude methane, ethane and other exempt compounds from the results of any VOM test provided that the test protocol to quantify and correct

for such compounds is included in the test plan approved by the Illinois EPA.

⁴ Metals shall include arsenic, cadmium, chromium, copper, lead, mercury and nickel.

⁵ Organic compounds measured by Method 23 shall include polychlorinated dibenzo-p-dioxins, polychlorinated dibenzofurans and polynuclear aromatic hydrocarbons.

- c. The Permittee shall submit an initial test plan to the Illinois EPA 60 days prior to the initial startup of a boiler.
- d. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification and test protocol for the expected date of testing shall be submitted a minimum of 30 days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of 5 working days prior to the actual date of the test. Notwithstanding 40 CFR 60.8(d), the Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.
- e. Three copies of the Final Report for these tests shall be promptly submitted to the Illinois EPA and in no case later than 60 days after the completion of the testing, and shall include as a minimum:
 - i. A summary of results that includes measured emission rates, emission rates in the terms of the applicable limits (e.g., lbs/hour and lbs/mmBtu), and whether compliance was demonstrated with applicable limits.
 - ii. Description of test methods and procedures used, including description of sampling train, analysis equipment, and test schedule.
 - iii. Detailed description of operating conditions during the period of testing, including the composition of the solid fuel (refer to Condition 2.1.7-2), operating parameters of the boiler (e.g., fuel usage, heat input, and oxygen content in the flue gas leaving the boiler), operating parameters of control equipment (refer to Condition 2.1.8-2), and composition of the ash (refer to Condition 2.1.7-2).
 - iv. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - v. Monitored emissions of NO_x, SO₂ and CO and opacity during the period of testing.

- f. Copies of emission test reports shall be retained for at least five years after the date that an emission test is superseded by a more recent test.

2.1.7-2 Sampling and Analysis of Solid Fuel Supplies and Boiler Ash

- a. i. The Permittee shall collect representative samples of the solid fuel supply for the affected boilers and have them analyzed for:
 - A. Heat content, Btu per pound, and moisture and ash content, by weight, by proximate analysis using the procedures specified by USEPA Method 19 and other standard methods.
 - B. Sulfur, chlorine, fluorine and metals (i.e., arsenic, cadmium, chromium, copper, lead, mercury and nickel) content, by weight, by ultimate analysis using standard methods accepted by USEPA.
- ii. This sampling and shall be conducted under the following circumstances and on the following schedule:
 - A. Analyses of the fuel supply to an affected boiler shall be conducted in conjunction with emissions testing, from composite sample(s) of fuel collected during the period in which testing is conducted (See Condition 2.1.7-1).
 - B. Analyses of representative samples of a biomass fuel other than wood shall be conducted in conjunction with acceptance of a new type of biomass fuel.
 - C. If analyses are not otherwise performed pursuant to the above requirements, analyses of representative samples of solid fuels shall be conducted on at least a quarterly basis during the first two years (24 months) of operation of the boilers and at least annually thereafter.
 - D. Analyses shall be conducted on the solid fuel supply to the boiler or fuel from specific supplier(s), as specified by the Illinois EPA within 15 days of a written request by the Illinois EPA or such later date agreed to by the Illinois EPA.
- b. i. The Permittee shall collect representative samples of the fly ash from the affected boilers and have them analyzed for metals (i.e., arsenic, cadmium, chromium, copper, lead, mercury and nickel) content, by weight, by ultimate analysis using standard methods accepted by USEPA.

- ii. This sampling and shall be conducted under the following circumstances and on the following schedule:
 - A. Analysis of the fly ash from an affected boiler shall be conducted in conjunction with emissions testing, from composite sample(s) of ash collected during the period in which testing is conducted (See Condition 2.1.7-1).
 - B. If analyses are not otherwise performed pursuant to the above requirement, analyses of representative samples of fly ash shall be conducted on at least a quarterly basis during the first two years (24 months) of operation of the boilers and at least annually thereafter.
 - C. Analysis shall be conducted on fly ash from the boilers collected under normal operating conditions of the boilers, as may be further identified by the Illinois EPA, within 15 days of a written request by the Illinois EPA or such later date agreed to by the Illinois EPA.
- c. For the purpose of Condition 2.1.7-2(a) and (b), unless otherwise specified, the Permittee may either analyze individual grab samples or composite samples collected over a period that is no longer than seven days.
- d. The Permittee shall keep records for the sampling and analysis conducted pursuant to this condition, and other sampling and analysis of the fuel for or ash from the boilers, including the results of the analysis, identification of the analysis methodology, and documentation for the collection of samples.

2.1.8-1 Emissions and Opacity Monitoring Requirements

- a. Emissions monitoring for NO_x and SO₂:
 - i. Pursuant to 40 CFR 60.48b and 40 CFR Part 75, for each affected boiler, the Permittee shall install, operate and maintain continuous emission monitoring systems (CEMS) for measuring NO_x and SO₂ emissions and either oxygen (O₂) or carbon dioxide (CO₂) from the boiler. These CEMS shall be installed and operational prior to initial firing of fuel in a boiler, and certified promptly thereafter. The procedures under 40 CFR 60.13 shall be followed for the installation, evaluation, and operation of these CEMS.
 - ii. For purposes of determining compliance with NSPS limits, these CEMS shall be operated during all periods of operation of a boiler except for CEMS breakdowns and repairs. This CEMS shall obtain emission data for at least 75 percent of the operating hours in at least 22

out of 30 successive boiler operating days as specified by 40 CFR 60.48b(f). Data is to be obtained during calibration checks, and zero and span adjustments as specified in the NSPS.

iii. In addition to being used to calculate emissions for purposes of the NSPS (as provided by 40 CFR 60.13(h) and 60.48b(b)(2)) and the Acid Rain Program, the data collected by these CEMS shall also be used to determine compliance with applicable mass emission limitations for NO_x and SO₂ established by this permit.

b. Emissions monitoring for CO:

i. The Permittee shall install, calibrate, operate and maintain CEMS for measuring CO emissions from each affected boiler. The relevant monitoring procedures in 40 CFR 60.48b(j)(4) shall be followed for these CEMS until and unless USEPA adopts procedures that would be directly applicable for continuous monitoring of CO emissions from boilers.

ii. These CEMS shall be used to determine compliance with the CO limits in Conditions in 2.1.2(b), 2.1.3-2(a) and 2.1.6.

c. Opacity Monitoring:

i. Pursuant to 40 CFR 60.48b and 40 CFR Part 75, the Permittee shall install, operate, and maintain continuous opacity monitoring systems (COMS) for each affected boiler. These COMS shall meet the performance specifications and operating requirements in Sections 3.1 through 3.8 of 40 CFR 51, Appendix P. These COMS shall be operated pursuant to formal monitoring procedures that include a quality assurance/control plan, which procedures shall reflect the manufacturer's instructions as adopted by the Permittee based on its experience. These COMS shall be installed and operational prior to initial firing of solid fuel in the boilers, and certified promptly thereafter.

ii. The Permittee shall collect the opacity monitoring system data pursuant to 40 CFR 60.49b(f) and reduce the opacity monitoring data to 6-minute averages.

d. i. Availability of emission data from a monitoring system does not shield the Permittee from potential enforcement for failure to properly maintain and operate the system.

ii. If the Permittee determines that a CEMS is inaccurately reporting excess emissions, an affected boiler may continue to operate provided the Permittee records the information it is relying upon to conclude that the

boiler and associated emission control systems are functioning properly and the CEMS is reporting inaccurate data, and the Permittee takes prompt action to restore the accuracy of the CEMS.

2.1.8-2 Operational Instrumentation and Monitoring Requirements

- a. The Permittee shall install, operate and maintain instrumentation for each affected boiler for the following operating parameters:
 - i. Consumption of fuels (i.e., solid fuel and natural gas).
 - ii. Combustion chamber temperature.
 - iii. Temperature of the flue gas at the inlet to the SNCR system and reagent feed rate by the SNCR system.
 - iv. Temperature and CO concentration of the flue gas at the inlet to the oxidation catalyst system and pressure drop across the oxidation catalyst beds.
 - v. Temperature of the flue gas at the inlet to the absorber and sorbent feed rate of the absorber.
 - vi. Temperature of the flue gas at the inlet to the baghouse and status of individual compartments in the baghouse (i.e., on-line, cleaning cycle, or out of service).
 - vii. Oxygen in the flue gas.
- b. The Permittee shall install, operate, and maintain the following monitoring devices on the baghouse for each affected boiler.
 - i. A bag leak detection system, which shall be installed, operated and maintained in accordance with relevant requirements of 40 CFR 63.7525(i) and records shall be kept for alarms from these systems that at a minimum include relevant information specified by 40 CFR 63.7540(a)(9).
 - ii. A device to monitor the pressure drop across the baghouse.

2.1.9-1 Recordkeeping Requirements for Solid Fuel

- a. i. The Permittee shall maintain a file containing the following information for each supplier of wood fuel to the plant:
 - A. Name and address of the supplier and each facility operated by the supplier that sends wood fuel to the plant.

- B. The type(s) of wood fuel that are supplied.
 - C. Copies of the completed agreements by the supplier to comply with the Wood Fuel Quality Control Plan (Attachment 3).
 - D. Copies of relevant portions of other contracts, agreements or other material developed by the supplier and the Permittee identifying the technical specifications for the type(s) of wood fuel that are provided to the plant.
 - E. Information and documentation to show that applicable criteria for acceptance of wood fuel from the supplier would be met.
- ii. The Permittee shall maintain records that address compliance with the requirements for acceptance of wood fuel, including the following information for each shipment of wood fuel presented to the plant: The identity of the supplier, the amount and type of wood, the staff member(s) that inspected the shipment, photographs of the shipment, and either confirmation that applicable criteria for acceptance were met or detailed explanation why the shipment was rejected, with description of the accompanying actions taken by the Permittee with the supplier.
 - iii. The Permittee shall maintain monthly records for:
 - A. The amount of wood fuel accepted during the month and the amount of wood fuel in storage at the plant at the end of the month (tons, by type of wood fuel).
 - B. A listing for shipments of wood fuel that were presented to the plant and rejected, by supplier.
 - iv. The Permittee shall maintain records documenting its training of personnel that are responsible for acceptance of wood fuel for the plant.
 - v. The Permittee shall maintain records documenting its inspections of the facilities that supply wood fuel to the plant.
- b. i. The Permittee shall maintain a file containing the identity and address of each supplier of biomass fuels (not including wood fuel, which is addressed above) to the plant, accompanied by: (1) the type(s) of biomass supplied; (2) the origin of material, if other than the supplier; (3) copies of relevant portions of the contracts, agreements or other material developed by the

supplier and the Permittee identifying the technical specifications and regulatory criteria for the type(s) of biomass that are provided to the plant; (4) copies of documentation for the biomass showing applicable technical specifications are met; and (5) information and documentation as the Permittee deems appropriate to show that applicable criteria for acceptance of the biomass should be met.

- ii. The Permittee shall maintain records that address compliance with the requirements for acceptance of biomass, including the following information for each shipment of biomass presented to the plant: The identity the supplier, the amount and type of material, the staff member(s) that inspected the shipment, and either confirmation that applicable criteria for acceptance were met or detailed explanation why the shipment was rejected, with description of the accompanying actions taken by the Permittee with the supplier.
- iii. The Permittee shall maintain records for the amount of biomass accepted (tons, by type).
- iv. The Permittee shall maintain logs (or other similar records) for periods when biomass is fired in the affected boilers, that include the estimated firing rate (i.e., the amounts of biomass and other fuels fired in the affected boilers, in tons, and the percentage of biomass fired, by weight) and any significant effect or consequences for the operation of the boilers and their emissions.

2.1.9-2 Recordkeeping Requirements for the Boilers

- a. The Permittee shall maintain a file that contains the following information:
 - i. The rated heat input of each affected boiler and the rated heat input of the natural gas fired burners in each boiler, with supported documentation.
 - ii. The Permittee's SSM Plan and other operating, maintenance and monitoring procedures for the affected boilers.
- b. The Permittee shall maintain the following operating records for each affected boiler:
 - i. Daily records of fuel usage, by type, and monthly records of annual capacity factor, as required by 40 CFR 60.49b(d).
 - ii. Usage of reagent for the SNCR system and sorbent (tons/month).

- iii. Usage of solid fuel (tons) and operating hours, on a monthly basis.
- c. The Permittee shall maintain the following logs or other similar records for each affected boiler:
 - i. An operating log, in accordance with Condition 3.1(a), which shall also include the information specified by the NSPS, 40 CFR 60.8(b), and note any deviations from normal startup procedures, as set forth in the Permittee's SSM Plan
 - ii. Inspection, maintenance and repair log(s) in accordance with Condition 3.1(b).
- d. The Permittee shall maintain for each occurrence when operation of an affected boiler continued during a malfunction or breakdown that acted to increase emissions or affect compliance, including the following information:
 - i. Date and duration of malfunction or breakdown.
 - ii. A description of the malfunction or breakdown.
 - iii. The corrective actions used to reduce the quantity of emissions and the duration of the occurrence.
 - iv. If excess emissions occurred:
 - A. An explanation why continued operation of the boiler was necessary;
 - B. The preventive measures planned or taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and
 - C. An estimate of the magnitude of excess emissions during the occurrence.
- e. The Permittee shall keep the following records related to emissions of each affected boiler:
 - i. Records of the emissions of NO_x and SO₂ from the boiler and other related information as required for each boiler operating day by the NSPS, 40 CFR 60.48b(g) and (k) or (l).
 - ii. A file containing a demonstration that the maximum emission rates of different pollutants, in lbs/mmBtu, lbs/hour, and ppm, as appropriate, of each boiler when operating normally comply with the applicable emission limits in Condition 2.1.2, 2.1.3-1, 2.1.3-2 and 2.1.6, with supporting documentation.

- iii. Records for any period of time including startup or malfunction/breakdown when emissions exceed an applicable limit.
- iv. Records for emissions of pollutants for which this permit contains standards or limitations, tons/month and tons/year, based on continuous emissions monitoring data or appropriate emission factors, and operating information, with supporting calculations.

2.1.10 Notification and Reporting Requirements

- a. The Permittee shall fulfill applicable notification and reporting requirements of the NSPS, 40 CFR 60.7 and 60.49b, for the affected boilers by sending required notifications and reports to the Illinois EPA, including the following reports:
 - i. Notification of the date of initial startup of each boiler, as provided by 40 CFR 60.7. This notification shall include: (1) the design heat input of the boiler, and (2) the annual capacity factor at which the Permittee anticipates operating the boiler.
 - ii. Reports containing the information recorded under 40 CFR 60.49b(g) and (j).
 - iii. Periodic reports for excess emissions, as further addressed by Condition 2.1.10(d).
- b. The Permittee shall promptly notify the Illinois EPA of any deviations from the requirements of this permit for the affected boilers as follows. These notifications shall include the information specified by Condition 3.4(a).
 - i. If there is an exceedance of a state emission or opacity standard other than during startup or shutdown, e.g., due to a malfunction or breakdown event, the Permittee shall immediately notify the Illinois EPA in accordance with Condition 2.1.10(c).
 - ii. If there is a deviation from other applicable requirements for PM emissions or opacity that is not repaired or otherwise corrected within two hours (120 minutes), the Permittee shall notify the Illinois EPA within 30 days.
 - iii. The deviations addressed above and all other deviations shall be reported in the periodic compliance report.
- c.
 - i. Pursuant to 35 IAC 201.263, the Permittee shall immediately report to the Illinois EPA, Regional Office, by telephone or fax upon continued operation of an affected boiler during a malfunction or breakdown of the boiler or associated control equipment when such

continued operation would cause an exceedance or violation of the applicable state emission standard.

- ii. The Permittee shall submit a written follow-up report to the Illinois EPA within five business days providing a detailed explanation of the event and explanation why continued operation of the boiler was necessary, the length of time during which operation continued under such conditions, the measures by the Permittee to minimize and correct deficiencies with chronology, and when the repairs were completed or the boiler was taken out of service.
- d. The Permittee shall submit periodic compliance reports to the Illinois EPA for the affected boilers, which reports shall include the following information. Unless otherwise specified, these reports shall be submitted on a quarterly basis, with each report submitted no later than 30 days following the end of the calendar quarter:
- i. As related to NSPS standards for NO_x or SO₂ emissions and opacity, the information required for reporting of exceedances under 40 CFR 60.7(c) or (d) and 60.49b(h) and (j) and the information specified by Condition 3.4(a). If there are no such exceedances during the reporting period, the report shall state that no exceedances occurred during the reporting period.
 - ii. As related to exceedances of other applicable emission limits in Condition 2.1.2(b), 2.1.3-2 or 2.1.6, the information specified by Condition 3.4.
 - iii. Information for other deviations during the reporting period, with the information specified by Condition 3.4.
 - iv. A summary of operation and emissions of each affected boiler during the reporting period, including the amounts of wood fuel and biomass used, total operating hours, number of startups by type, and average hourly emission rates for NO_x, SO₂ and CO.
 - v. The list of fuel shipments presented to the plant and rejected, based on the records required under 2.1.9(a)(iii)(B).
 - vi. The results of the analyses of solid fuel and fly ash pursuant to Condition 2.1.7-2 obtained during the reporting period, other than results that are provided to the Illinois EPA with a report for emission testing.
- e. The Permittee shall notify the Illinois EPA within 30 days of the following events with respect to the solid fuel supply for the affected boilers:

- i. Any significant change in the composition or character of the wood fuel supply to the boilers.
- ii. Use of a new type of biomass fuel.
- iii. If wood fuel or biomass, once accepted, is found to be either unacceptable or unsuitable for use as fuel, so as to require an alternative disposition of the material.

2.1.11 Additional Reporting for the Shakedown Period and the Following Year

- a. The Permittee shall provide the Illinois EPA with at least 15 days advance notice prior to initial startup (i.e., firing of fuel to produce steam) of each affected boiler.
- b. During the shakedown period for each boiler provided by Condition 1.16(a), the Permittee shall promptly notify the Illinois EPA of any event(s) that disrupts the orderly shakedown of the affected boiler.
- c. During the shakedown period for the affected boilers and a period that extends for one year (12 months) after the conclusion of the shakedown period, the Permittee shall submit the periodic compliance reports required by Condition 2.1.10(d) on a monthly basis, with reports submitted no later than 25 days after the end of each calendar month, beginning with the first month in which any fuel is fired in the boiler. During the shakedown period, these reports shall also include the following information:
 - i. Operating data for the boiler, i.e., total operating hours and solid fuel usage and maximum heat input achieved during the reporting period and maximum wood usage);
 - ii. Activities accomplished and significant events related to emissions of the boilers;
 - iii. Current schedule for emission testing;
 - iv. A summary of any emission measurements conducted; and
 - v. When applicable, notice that all emission testing has been completed and shakedown of the boiler is considered complete.

CONDITION 2.2: UNIT-SPECIFIC CONDITIONS FOR WOOD AND OTHER BULK MATERIAL
HANDLING AND STORAGE OPERATIONS

2.2.1 Description of Emission Units

The affected units for the purpose of these unit-specific conditions are the facilities at the plant for handling wood, biomass, limestone, lime and any other bulk materials, other than boiler ash, that are involved with the operation of the boilers and that have the potential for PM emissions. Affected units include receiving, transfer, storage operations (e.g., piles, etc.), as relevant for particular materials.

Emissions of PM from affected units must be controlled by appropriate measures given the nature of the material. In particular, units handling dry materials must be enclosed and aspirated to control equipment. For receiving and storage of fuel, for which total enclosure is not practicable, measures must be used to very effectively reduce the generation of emissions.

2.2.2 Applicable Federal Emission Standards

None

2.2.3 Applicable State Emission Standards

- a. The emission of smoke or other PM from affected units shall not have an opacity greater than 30 percent, except as allowed by 35 IAC 212.124. Compliance with this limit shall be determined by 6-minute averages of opacity measurements in accordance with USEPA Reference Method 9. [35 IAC 212.109 and 212.123(a)]
- b. With respect to emissions of fugitive PM, affected units shall comply with 35 IAC 212.301, which provides that emissions of fugitive PM shall not be visible from any process, including any material handling or storage activity, when looking generally toward the zenith at a point beyond the property line of the source, except when the wind speed exceeds 25 miles per hour, as provided by 35 IAC 212.314.
- c. The emissions of PM from affected units other storage piles for solid fuels and associated operations excluded by 35 IAC 212.323 (see Condition 2.2.4) shall comply with the applicable limit pursuant to 35 IAC 212.321, which rule limits emissions based on the process weight rate of emission units and allows a minimum emission rate of 0.55 lb/hour for any individual unit.

2.2.4 Non-Applicability of Regulations of Possible Concern

- a. This permit is issued based on the storage piles for solid fuel and associated operations not being subject to 35 IAC 212.321 pursuant to 35 IAC 212.323, which provides that 35 IAC 212.321 shall not apply to emission units, such as stock piles, to

which, because of the disperse nature of such emission units, such rules cannot reasonably be applied.

- b. This permit is issued based on the storage piles for solid fuel not being subject to 35 IAC 212.304 because the potential particulate matter emissions of the plant are less than 100 tons/year so that the applicability criteria of this rule are not satisfied.

2.2.5 Operating Requirements

- a. PM emissions from an affected unit handling lime or other similar fine material shall be controlled by:
 - i. Enclosure of the unit so as to prevent visible fugitive emissions from the affected unit.
 - ii. Aspiration to a control device designed to emit no more than 0.005 grains/dry standard cubic foot (gr/dscf), which device shall be operated in accordance with good air pollution control practice to minimize emissions.
- b. PM emissions from handling of solid fuel shall be controlled by application of water or other dust suppressants so as to minimize fugitive emissions to the extent practicable. For this purpose, there shall either:
 - i. Be no visible emissions from the affected unit, as determined in accordance with USEPA Method 22, or
 - ii. A nominal control efficiency of 80 percent shall be achieved from the uncontrolled emission rate, as follows, as determined using appropriate USEPA emission factors for particulate emissions from handling of material dry, in the absence of any control of emissions, and engineering analysis and calculations for the control measures that are actually present.
- c. PM emissions from an affected unit handling a wet material shall be controlled by maintaining the material with adequate moisture to prevent visible emissions directly from such unit during the handling, storage or load out of the material. For this purpose, wet material is a material that has sufficient moisture during normal operation to minimize the potential for direct emissions.
- d. The Permittee shall implement and maintain control measures for the affected units in accordance with a Fuel Management Plan that minimizes visible emissions of PM and provides assurance of compliance with the applicable standards and requirements in Conditions 2.2.3 and 2.2.5(a), (b) and (c). (See also Condition 2.1.5-1(d).)

2.2.6 Emission Limitations

Annual emissions of PM and PM₁₀ from the affected units shall not exceed 0.42 and 0.33 tons/year, respectively. Compliance with this limit shall be calculated from the material handled and other, operating information for affected units, and appropriate emission factors.

2.2.7 Emissions Testing and Opacity Observations

The Permittee shall conduct testing for the affected units in accordance with Conditions 3.2 and 3.3.

2.2.8 Operational Instrumentation

The Permittee shall install, operate and maintain systems to measure the pressure drop across each baghouse used to control affected units, other than bin vent filters and other similar filtration devices.

2.2.9 Inspections

- a.
 - i. The Permittee shall conduct inspections of affected units on at least a monthly basis with personnel who are not directly responsible for the day-to-day operation of these units, for the specific purpose of verifying that the measures identified in the operating program and other measures required to control emissions from affected units are being properly implemented.
 - ii. These inspections shall include observation for the presence of visible emissions, performed in accordance with USEPA Method 22, from buildings in which affected units are located and from units from which the Permittee has elected to demonstrate no visible emissions.
- b. The Permittee shall perform detailed inspections of the dust collection equipment for affected units while the units are out of service, with an initial inspection performed before any maintenance and repair activities are conducted during the period the unit is out of service and a follow-up inspection performed after any such activities are completed. These inspections shall be conducted at least every 15 months.

2.2.10 Recordkeeping

- a. The Permittee shall maintain file(s), which shall be kept current, that contain:
 - i. The maximum operating capacity of each affected unit or group of related units (tons/hour).
 - ii. A. For the baghouse(s) and other filter devices associated with affected units, design

specifications for each device (type of unit, maximum design exhaust flow (acfm and scfm), filter area, type of filter cleaning, performance guarantee for particulate exhaust loading in gr/scf, etc.), the manufacturer's recommended operating and maintenance procedures for the device, and design specification for the filter material in each device (type of material, surface treatment(s) applied to material, weight, performance guarantee, warranty provisions, etc.).

- B. For each baghouse, the normal range of pressure drop across the device and the minimum and maximum safe pressure drop for the device, with supporting documentation.
- iii. For affected units that are not controlled with baghouses or other filter-type devices, a detailed description of the work practices used to control emissions of PM pursuant to Condition 2.2.5(b). These control measures are referred to as the "established control measures" in this subsection of this permit.
- iv. The designated PM and PM₁₀ emission rate, in pounds/hour and tons/year, from affected units, either individually or grouped by related units, with supporting calculations and documentation, including detailed documentation for the level of emissions control achieved through the work practices that are used to control PM emissions. The sum of these annual emission rates shall not exceed the limit in Condition 2.2.6.
- v. A demonstration that confirms that the above established control measures are sufficient to assure compliance with the above emissions rates and, for units to which it applies, Condition 2.2.3(c), at the maximum process weight rate at which each affected unit can be operated (tons/hour), with supporting emission calculations and documentation for the emission factors and the efficiency of the control measures being relied upon by the Permittee. Except as addressed by Condition 2.2.10(b)(ii) or testing of PM emissions from an affected unit is conducted in accordance with Condition 2.2.7-1, this demonstration shall be developed using emission factors for uncontrolled PM emissions, efficiency of control measures, and controlled PM emissions published by USEPA.
- b. The Permittee shall keep records for the amount of bulk materials received by or loaded out from the plant by category or type of material (tons/month).
- c. i. The Permittee shall keep inspection and maintenance log(s) or other records for the control measures

associated with the affected units, including buildings and enclosures, dust suppression systems and control devices.

- ii. These records shall include the following information for the inspections required by Condition 2.2.9(a):
 - A. Date and time the inspection was performed and name(s) of inspection personnel.
 - B. The observed condition of the control measures for each affected unit, including the presence of any visible emissions.
 - C. A description of any maintenance or repair associated with established control measures that are recommended as a result of the inspection and a review of outstanding recommendations for maintenance or repair from previous inspection(s), i.e., whether recommended action has been taken, is yet to be performed or no longer appears to be required.
 - D. A summary of the observed implementation or status of actual control measures, as compared to the established control measures.
- iii. These records shall include the following information for the inspections required by Condition 2.2.9(b):
 - A. Date and time the inspection was performed and name(s) of inspection personnel.
 - B. The observed condition of the dust collection equipment.
 - C. A summary of the maintenance and repair that is to be or was conducted on the equipment.
 - D. A description of any maintenance or repair that is recommended as a result of the inspection and a review of outstanding recommendations for maintenance or repair from previous inspection(s), i.e., whether recommended action has been taken, is yet to be performed or no longer appears to be required.
 - E. A summary of the observed condition of the equipment as related to its ability to reliably and effectively control emissions.
- d. The Permittee shall maintain records of the following for each incident when any affected unit operated without the control measures required by Condition 2.2.2 or 2.2.5(b) or (c):

- i. The date of the incident and identification of the unit(s) that were involved.
 - ii. A description of the incident, including: the established control measures that were not present or implemented; the established control measures that were present, if any; and other control measures or mitigation measures that were implemented, if any.
 - iii. The time at and means by which the incident was identified, e.g., scheduled inspection or observation by operating personnel.
 - iv. Operational data for the incident, e.g., the measured pressure drop of a baghouse, if the pressure drop of the baghouse, as measured pursuant to Condition 2.2.8, deviated outside the levels set as good air pollution control practices.
 - v. The corrective action(s) taken and the length of time after the incident was identified that the unit(s) continued to operate before established control measures were in place or the operations were shutdown (to resume operation only after established control measures were in place) and, if this time was more than one hour, an explanation why this time was not shorter, including a detailed description of any mitigation measures that were implemented during the incident.
 - vi. The estimated total duration of the incident, i.e., the total length of time that the unit(s) ran without established control measures and the estimated amount of material processed during the incident.
 - vii. A discussion of the probable cause of the incident and any preventative measures taken.
 - viii. An estimate of any additional emissions of PM or PM₁₀ (pounds) above the emissions associated with normal operation that resulted from the incident, if any, with supporting calculations.
 - ix. A discussion whether any applicable emission standard, as listed in Condition 2.2.3, or any applicable emission rate, as identified in the records pursuant to Condition 2.2.10(b), may have been violated during the incident, with an estimate of the amount of any excess PM emissions (lbs) and supporting explanation.
- e. The Permittee shall maintain the following records for the emissions of the affected units:

- i. A file containing the standard emission factors used by the Permittee to determine PM emissions from the units, with supporting documentation.
- ii. Records of PM and PM₁₀ emissions based on operating data for the unit(s) and appropriate emission factors, with supporting documentation and calculations.

2.2.11 Notifications and Reporting Requirements

- a. The Permittee shall notify the Illinois EPA within 30 days of deviations from applicable 24 hour requirements or requirements for the affected units that continue for more than 24 hours. These notifications shall include the information specified by Condition 3.4(a).
- b. The Permittee shall submit quarterly reports to the Illinois EPA for all deviations from emission standards and operating requirements set by this permit. These notifications shall include the information specified by Condition 3.4(a).
- c. These reports shall also address any deviations from applicable compliance procedures established by this permit for affected units.

CONDITION 2.3: UNIT-SPECIFIC CONDITIONS FOR ASH HANDLING

2.3.1 Description

The affected units are the fly ash and bed ash handling, transfer and storage units. Fly ash recovered by the baghouses on the boilers is transferred to the fly ash storage silo. Displaced air from the fly ash storage silo is filtered through the bin vent filter. Stored fly ash is loaded out by trucks either wet, after mixing with water, or dry in an enclosed system, with displaced air passed through a baghouse. Bed ash collected from the bed of the boilers handled indoors, within the boiler building, and wetted as needed to prevent emissions.

2.3.2 Applicable Federal Emission Standards

None

2.3.3 Applicable State Emission Standards

- a. The affected units are subject to 35 IAC 212.321(b), which provides that 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, either alone or in combination with the emission of particulate matter from all other similar new process emission units, at a source or premises, exceeds the allowable emission rates specified in of 35 IAC 212.321(c).
- b. The emission of smoke or other PM from the affected units shall not have an opacity greater than 30 percent, except as allowed by 35 IAC 212.124. Compliance with this limit shall be determined by 6-minute averages of opacity measurements in accordance with USEPA Reference Method 9. [35 IAC 212.109 and 212.123(a)]
- c. With respect to emissions of fugitive PM, the affected units shall comply with 35 IAC 212.301, which provides that emissions of fugitive PM shall not be visible from any process, including any material handling or storage activity, when looking generally toward the zenith at a point beyond the property line of the source, except when the wind speed exceeds 25 miles per hour, as provided by 35 IAC 212.314.
- d. The affected units are subject to 35 IAC 212.307, which requires that all unloading and transporting operations of materials collected by pollution control equipment be enclosed or utilize spraying, palletizing, screw conveying or other equivalent methods.
- e. The loading of ash into trucks for transport from the plant shall be conducted to comply with 35 IAC 212.315, which provides that no person shall cause or allow the operation of a vehicle of the second division or a semi-trailer, as defined by

Sections 1-217 and 1-187 of the Motor Vehicle Code, respectively (625 ILCS 5/1-217 and 5/1-187), without a covering sufficient to prevent the release of particulate matter into the atmosphere (other than exhaust emissions) or if less strict, the level of control required by Section 15-109 of the Motor Vehicle Code (625 ILCS 5/15-109.1), as provided by Section 10(E) of the Environmental Protection Act.

2.3.4 Non-Applicability of Regulations of Concern

None

2.3.5 Operational and Production Limits, and Work Practices

- a.
 - i. PM emissions from affected units shall be controlled by enclosure of units so as to prevent visible emissions, as defined by 40 CFR 60.671, from the units.
 - ii. PM emissions from handling of dry ash shall be aspirated to filter-type control devices designed to emit no more than 0.005 grains/dry standard cubic foot (gr/dscf), which device shall be operated in accordance with good air pollution control practice to minimize emissions.
- b. The Permittee shall operate and maintain affected units and associated air pollution control equipment in accordance with good air pollution practice to minimize emissions. Proper maintenance shall include the following minimum requirements:
 - i. Visual inspection of air pollution control equipment on a regular basis;
 - ii. Maintenance of an adequate inventory of spare parts; and
 - iii. Expeditious repairs, unless the unit is shutdown.
- c. Any ash that is not loaded into a fully enclosed transport vehicle (e.g., a vacuum truck or bottom discharge hopper trailer) shall be treated by the Permittee with water or dust suppressant and the load of ash shall then be tarped, covered or otherwise enclosed prior to leaving the plant so as to prevent loss of ash during transport.
- d. The Permittee shall collect any ash that is spilled during loadout so as to prevent such ash from being tracked out of the loadout area by transport vehicles or otherwise becoming airborne.

2.3.6 Emission Limitations

Annual emissions of PM from the affected units shall not exceed 0.7 tons/year. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

2.3.7 Emissions Testing and Opacity Observations

The Permittee shall conduct testing for the affected units in accordance with Conditions 3.2 and 3.3.

2.3.8 Instrumentation Requirements

The Permittee shall install, operate and maintain systems to measure the pressure drop across each baghouse used to control affected units, other than bin vent filters and other similar filtration devices.

2.3.9 Inspections

- a.
 - i. The Permittee shall conduct inspections of affected units on at least a monthly basis with personnel who are not directly responsible for the day-to-day operation of these units, for the specific purpose of verifying that the measures identified in the operating program and other measures required to control emissions from affected units are being properly implemented.
 - ii. These inspections shall include observation for the presence of visible emissions, performed in accordance with USEPA Method 22, from buildings in which affected units are located and from units from which the Permittee has elected to demonstrate no visible emissions.
- b. The Permittee shall perform detailed inspections of the dust collection equipment for affected units while the units are out of service, with an initial inspection performed before any maintenance and repair activities are conducted during the period the unit is out of service and a follow-up inspection performed after any such activities are completed. These inspections shall be conducted at least every 15 months.

2.3.10 Recordkeeping Requirements

- a. The Permittee shall maintain a file containing the manufacturer's specifications and recommended operation and maintenance procedures for each fabric filter, including the design level of PM emissions, in gr/scf.
- b. The Permittee shall maintain an operating log or other operating records that at a minimum identify any period during which an affected unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation, and any other deviation from applicable requirements for affected units and the loadout of ash. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall

state what corrective actions were taken and what repairs were made.

- c. The Permittee shall maintain records of the total amounts of fly and bed ash handled, in tons/month and tons/year.
- d. The Permittee shall maintain a maintenance log or other records for inspections, maintenance, and repairs of all affected units and associated air pollution control equipment.
- e. The Permittee shall maintain records of monthly and annual emissions of PM from the affected units, with supporting calculations to be calculated on at least a quarterly basis.

2.3.11 Notifications and Reporting Requirements

- a. The Permittee shall notify the Illinois EPA within 30 days of deviations from applicable 24 hour requirements or requirements for the affected units that continue for more than 24 hours. These notifications shall include the information specified by Condition 3.4(a).
- b. The Permittee shall submit quarterly reports to the Illinois EPA for all deviations from emission standards and operating requirements set by this permit. These notifications shall include the information specified by Condition 3.4(a).
- c. These reports shall also address any deviations from applicable compliance procedures established by this permit for affected units.

CONDITION 2.4: UNIT-SPECIFIC CONDITIONS FOR THE COOLING TOWER

2.4.1 Description of Emission Unit

The affected unit for the purpose of this unit-specific condition is a cooling tower associated with the steam cycle for the boilers. The cooling tower is a source of particulate matter (PM) because of mineral material present in the water, which is emitted to the atmosphere due to water droplets that escape from the cooling tower or completely evaporate. The emissions of PM are controlled by drift eliminators, which collect water droplets entrained in the air exhausted from the cooling tower.

2.4.2 Applicable Federal Emission Standards

None

2.4.3 Applicable State Emission Standards

- a. The affected units are subject to 35 IAC 212.321(b), which provides that 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, either alone or in combination with the emission of particulate matter from all other similar new process emission units, at a source or premises, exceeds the allowable emission rates specified in of 35 IAC 212.321(c).
- b. The emission of smoke or other PM from the affected unit shall not have an opacity greater than 30 percent, except as allowed by 35 IAC 212.124. Compliance with this limit shall be determined by 6-minute averages of opacity measurements in accordance with USEPA Reference Method 9. [35 IAC 212.109 and 212.123(a)]
- c. With respect to emissions of fugitive PM, the affected unit shall comply with 35 IAC 212.301, which provides that emissions of fugitive PM shall not be visible from any process, including any material handling or storage activity, when looking generally toward the zenith at a point beyond the property line of the source, except when the wind speed exceeds 25 miles per hour, as provided by 35 IAC 212.314.

2.4.4 Applicability of Other Regulations

None

2.4.5 Operating Requirements

- a. The affected unit shall be equipped, operated, and maintained with drift eliminators designed to limit the loss of water droplets from the unit to not more than 0.0005 percent of the circulating water flow.

- b. i. Chromium-based water treatment chemicals, as defined in 40 CFR 63.401, shall not be used in the affected unit.
- ii. A. Only non-VOM additives shall be used in the cooling tower.
- B. Plant process wastewater shall not be introduced into cooling water, other than through unintentional leaks, which shall promptly be repaired.
- c. i. The affected unit shall be equipped with appropriate features, such as louvered heating coils designed to heat tower plenum air as required, to enable it to be operated without a significant contribution to fogging and icing on offsite roadways during periods when fogging or icing are present in the area or weather conditions are conducive to fogging or icing.
- ii. Notwithstanding the above, such features need not be in the affected unit if the Permittee demonstrates by appropriate analysis, as approved in writing by the Illinois EPA, that the cooling tower will be sited and designed and can be operated such that additional features are not needed to prevent a significant contribution to fogging and icing on offsite roadways.
- d. The Permittee shall operate and maintain the affected unit, including the drift eliminators, in a manner consistent with good air pollution control practices for minimizing emissions.
- e. The Permittee shall operate and maintain the affected unit in accordance with written operating procedures, which procedures shall be kept current. These procedures shall address the practices that will be followed as good air pollution control practices and the actions that will be followed to prevent a significant contribution to icing and fogging on offsite roadways.

2.4.6 Emission Limitations

The emissions of particulate matter from the affected unit shall not exceed 0.21 pounds of PM₁₀ per hour and 0.9 tons per year, as determined from relevant operating data for the cooling tower and the efficiency of the drift eliminators, using engineering calculations for the emissions of PM₁₀ due to the drift from the unit.

2.4.7 Emission Testing

None

2.4.8 Sampling and Analysis Requirement

- a. The Permittee shall sample and analyze the water being circulated in the affected unit on at least a monthly basis for the total dissolved solids content. Measurements of the total dissolved solids content in the wastewater discharge associated with the affected unit, as required by a National Pollution Discharge Elimination System permit, may be used to satisfy this requirement if the effluent has not been diluted or otherwise treated in a manner that would significantly reduce its total dissolved solids content.
- b. Upon written request by the Illinois EPA, the Permittee shall promptly have the water circulating in the affected unit sampled and analyzed for the presence of hexavalent chromium in accordance with the procedures of 40 CFR 63.404(a) and (b).
- c. The Permittee shall keep records for this sampling and analysis activity, including documentation for sampling and analysis as well the resulting data that is collected.

2.4.9 Operational Measurements

Within 90 days after initial operation of the wood-fired boilers fired with solid fuel, the Permittee shall test the percent drift achieved by the drift eliminator pursuant to Cooling Technology Institute's Acceptance Test Code No. 140. This test shall be performed by a licensed performance testing service.

2.4.10 Records

- a. The Permittee shall keep a file that contains:
 - i. The design loss specification for the drift eliminators installed in the affected unit.
 - ii. The suppliers' recommended procedures for inspection and maintenance of the drift eliminators.
 - iii. The operating factors, if any, used to determine the amount of water circulated in the affected unit or the PM emissions from the affected unit, with supporting documentation.
 - iv. Calculations for the maximum PM₁₀ emissions from the cooling tower (pounds/hour, 24-hour average), based on maximum operating rate of the cooling tower and other factors that result in greatest emissions.
 - v. Copies of the Material Safety Data Sheets or other comparable information from the suppliers for the various water treatment chemicals that are added to the water circulated in the affected unit.

- b. Records for the actions used to routinely verify the solids contents of the water circulating in the cooling tower, such as sampling and analysis in accordance with the NPDES permit, periodic grab sampling and analysis, conductivity measurements, etc., including:
 - i. If routine verification will not be conducted pursuant to the NPDES permit, a written description of the procedures, with explanation of how they act to address compliance.
 - ii. Records for implementation of the procedure, including measured value(s) of relevant parameter(s).
- c. The Permittee shall keep the following operating records for the affected unit:
 - i. The amount of water circulated in the affected unit, gallons/month. As an alternative to direct data for water flow, these records may contain other relevant operating data for the unit (e.g., water flow to the unit) from which the amount of water circulated in the unit may be reasonably determined.
 - ii. Each occasion when the Permittee took action to prevent a significant contribution to fogging or icing from the affected unit, including the date and duration, the action or actions that were taken, the weather conditions that triggered such actions, and the weather conditions when such actions were terminated.
- d. The Permittee shall keep inspection and maintenance logs for the drift eliminators installed in the affected unit.
- e. The Permittee shall maintain records for the particulate matter emissions of the affected unit based on the above records, the measurements required by Condition 2.4.9(a), and appropriate emission estimation methodology and emission factors, with supporting calculation.

2.4.11 Notifications and Reporting Requirements

- a. The Permittee shall notify the Illinois EPA within 30 days of deviations from applicable requirements that are not addressed by the regular reporting required below. These notifications shall include the information specified by Condition 3.4(a).
- b. If the cooling tower is equipped with features to address fogging and icing, as addressed by Condition 2.4.5(b), the Permittee shall submit quarterly reports to the Illinois EPA summarizing the records required by Condition 2.4.10(b)(ii) and identifying any deviation from established practices for the use of such features.

- c. If the cooling tower is damaged so there is a deviation from an applicable requirements that is not repaired or otherwise corrected within 24 hours, the Permittee shall then immediately notify the Illinois EPA.
- d. The deviations addressed above and all other deviations shall be reported with the quarterly compliance report.

CONDITION 2.5: UNIT-SPECIFIC CONDITIONS FOR ROADWAYS AND OTHER OPEN AREAS

2.5.1 Description of Emission Units

The affected units for the purpose of these unit-specific conditions are roadways, parking areas, and other open areas associated with the operation of the plant, which may be sources of fugitive particulate matter due to vehicle traffic or wind blown dust. These emissions are controlled by paving and implementation of work practices to prevent the generation and emissions of particulate matter.

2.5.2 Applicable Federal Emission Standards

None

2.5.3 Applicable State Emission Standards

- a. All affected units shall comply with 35 IAC 212.301, which provides that emissions of fugitive particulate matter shall not be visible from any process, including material handling, or storage activity when looking generally toward the zenith at a point beyond the property line of the source, except when the wind speed is greater than 25 miles per hour, as provided by 35 IAC 212.314.
- b. Pursuant to 35 IAC 212.309 through 212.312, the affected units shall be operated under the provisions of a fugitive dust operating program, consistent with the requirements set forth in 35 IAC 212.310 and 212.312. This program shall be prepared by the Permittee and submitted to the Illinois EPA for review in accordance with 35 IAC 212.309(a) and 212.312.

2.5.4 Non-Applicability of Regulations of Concern

The fugitive emissions from affected units are not used to determine PSD applicability because these emissions do not fall under the provisions of 40 CFR 52.21(b)(1)(c)(iii).

2.5.5 Operational and Production Limits and Work Practices

- a.
 - i. Good air pollution control practices shall be implemented to minimize dust emissions from affected units. These practices shall provide for pavement on all regularly traveled roads and treatment (flushing, vacuuming, dust suppressant application, etc.) of paved and unpaved roadways and areas that are routinely subject to vehicle traffic for very effective and effective control of dust, respectively (nominal 90 percent control for paved roads and areas and 85 percent control for unpaved roads and areas).
 - ii. For this purpose, roads that serve the office building, employee parking areas or are used on a daily basis by

operating and maintenance personnel for the source in the course of their typical duties shall all be considered to be subject to regular travel and are required to be paved. Regularly traveled roads shall be considered to be subject to routine vehicle traffic except as they are used primarily for periodic maintenance and are currently inactive or as traffic has been temporarily blocked off. Other roads shall be considered to be routinely traveled if activities are occurring such that they are experiencing significant vehicle traffic.

- b. The Permittee shall carry out control of fugitive particulate matter emissions from affected units in accordance with a written operating program describing the measures being implemented in accordance with Conditions 2.5.2 and 2.5.3 to control emissions at each unit with the potential to generate significant quantities of such emissions, which program shall be kept current.
 - i. The written operating program shall include:
 - A. Maps or diagrams indicating the location of affected units with the potential to generate significant quantities of fugitive particulate matter, with description of the unit (length, width, surface material, etc.) and volume and nature of expected vehicle traffic, or other activity on such unit, and an identification of any roadways that are not considered routinely traveled, with justification.
 - B. A detailed description of the emissions control technique(s) (e.g., vacuum truck, water spray, surfactant spray, water flushing, dust suppressant application, or sweeping) for the affected unit, including: typical application rate; type and concentration of additives; normal frequency with which measures would be implemented; circumstances, in which the measure would not be implemented, e.g., recent precipitation; triggers for additional control, e.g., observation of 12 percent opacity; and calculated control efficiency for PM emissions.
 - ii. The Permittee shall submit copies of the written operating program to the Illinois EPA for review, significant amendments to the program by the Permittee shall be submitted within 30 days of the date that the amendment is made.
 - iii. A revised operating program shall be submitted to the Illinois EPA for review within 90 days of a request from the Illinois EPA for revision to address observed deficiencies in control of fugitive particulate matter emissions.

- c. The Permittee shall conduct inspections of affected units on at least a monthly basis, with personnel not directly responsible for the day-to-day implementation of the fugitive dust control program, for the specific purpose of verifying that the measures identified in the operating program and other measures required to control emissions from affected units are being properly implemented.
- d. The handling of material collected from any affected unit associated with the plant by sweeping or vacuuming trucks shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods to control PM emissions.

2.5.6 Emission Limitations

The emissions of PM from affected units, as PM₁₀, shall not exceed 0.5 tons/year. Compliance with this limit shall be determined by vehicle traffic and other operating data for the plant, information for the implementation of the operating program, appropriate emission factors, and engineering calculations.

2.5.7 Opacity Observations

- a. The Permittee shall conduct performance observations, which include a series of observations of the opacity of fugitive emissions from the affected units as follows to determine the range of opacity from affected units and the change in opacity as related to the amount and nature of vehicle traffic and implementation of the operating program. For performance observations, the Permittee shall submit test plans, test notifications and test reports, as specified by General Condition 3.0.
 - i. Performance observations shall first be completed no later than 30 days after the date that initial emission testing of the affected boiler is performed, as required by Condition 2.1.7, in conjunction with the measurements of silt loading on the affected units required by Condition 2.4.8.
 - ii. Performance observations shall be repeated within 30 days in the event of changes involving affected units that would act to increase opacity (so that observations that are representative of the current circumstances of the affected units have not been conducted), including changes in the amount or type of traffic on affected units, changes in the standard operating practices for affected units, such as application of salt or traction material during cold weather, and changes in the operating program for affected units.
- b. Compliance observations shall be conducted for affected units on at least a quarterly basis to verify opacity levels and

confirm the effectiveness of the operating program in controlling emissions.

- c. Upon written request by the Illinois EPA, the Permittee shall conduct performance or compliance observations, as specified in the request. Unless another date is agreed to by the Illinois EPA, performance observations shall be completed within 30 days and compliance observations shall be completed within 5 days of the Illinois EPA's request.

2.5.8 Operational Measurements

The Permittee shall conduct measurements of the silt loading on various affected roadway segments and parking areas, as follows:

- a. Sampling and analysis of the silt loading shall be conducted using the "Procedures for Sampling Surface/Bulk Dust Loading," Appendix C.1 in Compilation of Air Pollutant Emission Factors, USEPA, AP-42. A series of samples shall be taken to determine the average silt loading and address the change in silt loadings as related to the amount and nature of vehicle traffic and implementation of the operating program.
- b. Measurements shall be performed by the following dates:
 - i. Measurements shall first be completed no later than 30 days after the date that initial emission testing of an affected boiler is performed, as required by Condition 2.1.7.
 - ii. Upon written request by the Illinois EPA, the Permittee shall conduct measurements, as specified in the request, which shall be completed within 75 days of the Illinois EPA's request.
- c. The Permittee shall submit test plans, test notifications and test reports for these measurements in conjunction with the plan required in Condition 2.1.7-1 and notification specified by Conditions 3.2 - 3.6, provided, however, that once a test plan has been accepted by the Illinois EPA, a new test plan need not be submitted if the accepted plan will be followed or a new test plan is requested by the Illinois EPA.

2.5.9 Records

- a. The Permittee shall keep a file that contains:
 - i. The operating factors, if any, used to determine the amount of activity associated with the affected units or the PM emissions from the affected units, with supporting documentation.
 - ii. The designated PM emission rate, in tons/year, from each category of affected units (e.g., traffic associated with

receiving of wood), with supporting calculations and documentation. The sum of these rates shall not exceed the annual limit on emissions in Condition 2.5.6.

- b. The Permittee shall maintain records documenting implementation of the operating program required by Condition 2.5.5, including:
 - i. Records for each treatment of an affected unit or units:
 - A. The identity of the affected unit(s), the date and time, and the identification of the truck(s) or treatment equipment used;
 - B. For application of dust suppressant by truck: target application rate or truck speed during application, total quantity of water or chemical used and, for application of a chemical or chemical solution, the identity of the chemical and concentration, if applicable;
 - C. For sweeping or cleaning: Identity of equipment used and identification of any deficiencies in the condition of equipment; and
 - D. For other type of treatment: A description of the action that was taken.
 - ii. Records for each incident when control measures were not implemented and each incident when additional control measures were implemented due to particular activities, including description, date, a statement of explanation, and expected duration of such circumstances.
- c. The Permittee shall record any period during which an affected unit was not properly controlled as required by this permit, which records shall include at least the information specified by Condition 3.3 and an estimate of the additional PM emissions that resulted, if any, with supporting calculations.
- d. The Permittee shall keep records for the measurements conducted for affected units pursuant to Condition 2.5.8, including records for the sampling and analysis activities and results.
- e. The Permittee shall maintain records for the PM emissions of the affected units to verify compliance with the limits in Condition 2.5.6, based on operating data for the affected units and other activities at the plant, data for implementation of the operating program, and appropriate USEPA emission estimation methodology and emission factors, with supporting calculations.

2.5.10 Notifications and Reporting Requirements

- a. The Permittee shall notify the Illinois EPA within 30 days of deviations from applicable requirements for affected units that are not addressed by the regular reporting required below. These notifications shall include the information specified by Condition 3.4(a).
- b. The Permittee shall submit quarterly reports to the Illinois EPA for affected units stating the following: the dates any necessary control measures were not implemented; a listing of those control measures; the reasons that the control measures were not implemented; and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not implemented based on a belief that implementation of such control measures would have been unreasonable given prevailing weather conditions. This report shall be submitted to the Illinois EPA with the quarterly compliance report.
- c. These reports shall also address any deviations from applicable compliance procedures established by this permit for affected units.

SECTION 3: GENERAL CONDITIONS

3.1 General Requirements for "Logs" Or Similar Records

- a. Operating logs or other similar records required by this permit shall, at a minimum, include the following information related to the emission units and associated control system:
 - i. Information identifying periods when an emission unit or group of related emission units was not in service.
 - ii. For periods when a unit or group of related units is in service and operating normally, relevant process and control system information to generally confirm normal operation,
 - iii. For periods when a unit or group of related units is in service and is not operating normally, identification of each such period, with detailed information describing the operation of the unit(s), the potential consequences for additional emissions from the unit(s), the potential of any excess emissions from the affected unit(s), the actions taken to restore normal operation, and any actions taken to prevent similar events in the future.
 - iv. Other information as may be appropriate to show that the emission unit or group of related emission units is operated in accordance with good air pollution control practices.
- b. Inspection, maintenance and repair logs or other similar information required by this permit shall, at a minimum, include the following information related to the emission units and associated control system:
 - i. Identification of equipment, with date, time, responsible employee and type of activity.
 - ii. For inspections, a description of the inspection, findings, and any recommended actions, with reason.
 - iii. For maintenance and repair activity, a description of actions taken, reason for action, e.g., preventative measure or corrective action as a result of inspection, probable cause for requiring maintenance or repair if not routine or preventative, and the condition of equipment following completion of the activity.
 - iv. Other information as may be appropriate to show that the emission unit or group of related emission units is maintained in accordance with good air pollution control practices, including prompt repair of defects that interfere with effective control of emissions.

- c. The logs required by this permit may be kept in manual or electronic form, and may be part of a larger information database maintained by the Permittee provided that the information required to be kept in a log is readily accessible.

3.2 Emission Testing Requirements

- a. Upon written request by the Illinois EPA, the Permittee shall have emissions testing conducted at its expense by an approved testing service, which testing shall be completed within 45 calendar days of the request or on the date agreed upon by the Illinois EPA, whichever is later. Unless otherwise specified by this permit or a request from the Illinois EPA for the performance of emission testing, emission testing shall be conducted while affected unit(s) are operating at maximum rate(s) and during other representative operating conditions of the unit(s) and associated control system(s).

- b. i. USEPA test methods and procedures shall be used for measurement of emissions, including the following methods, unless other methods are specified in unit-specific condition of this permit or are approved by the Illinois EPA as part of the approval of a test plan. Refer to 40 CFR 60, Appendix A and 40 CFR 51, Appendix M for USEPA test methods.

PM or PM ₁₀ (filterable)	Method 5
PM ₁₀ ^a	Methods 5 and 202

Notes:

^a Unless otherwise specified, PM₁₀ tests shall include measurements of condensable particulate, as collected in the back half of the Method 5 sampling train or by separate measurements using USEPA Method 202 (40 CFR Part 51, Appendix M). For emission units for which the average stack gas temperature is less than 250°F, testing may be conducted at actual stack gas temperature without heating of the probe or filter holders.

- ii. During measurements of PM or PM₁₀ emissions, observations of opacity shall also be conducted in accordance with USEPA Method 9.
- c. The Permittee shall submit a written test plan to the Illinois EPA for review and approval for initial testing of an emission unit and if a significant change in the procedures for testing is planned from the procedures followed in the previous testing of an emission unit. This plan shall be submitted at least 60 days prior to the actual date of testing and include the following information as a minimum:
 - i. A description of the planned emission test.

- ii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of the maximum emissions, the levels of operating parameters at or within which compliance is intended to be shown, if parameters for the process and any control equipment will be determined.
 - iii. The specific determination of emissions and operations intended to be made, including sampling and monitoring locations.
 - iv. The test methods that will be used, with the specific analysis method.
 - v. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
 - vi. A statement that the testing will be performed by a qualified independent testing service.
- d.
- i. Prior to carrying out emission tests, the Permittee shall notify the Illinois EPA a minimum of 30 days prior to the scheduled date of these tests with the exact date, time and place of these tests, to enable the Illinois EPA to witness these tests.
 - ii. If the scheduled date for the test is changed, the Permittee shall inform the Illinois EPA within 5 working days of the scheduled test date and must specify the date and time of the rescheduled test.
 - iii. Notwithstanding the above, the Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.
- e. The Permittee shall submit three copies of the Final Report(s) for emissions tests to the Illinois EPA no later than 60 days after completion of sampling. The Final Report shall include as a minimum:
- i. General information, i.e., date of test, names of testing personnel, and names of Illinois EPA observers.
 - ii. A summary of the measured emissions of different pollutants in pounds per hour and other appropriate terms, e.g., lbs/ton, lbs/ton, gr/dscf or ppmv.

- iii. A statement whether compliance was demonstrated.
- iv. A detailed description of operating conditions of the emission unit(s) during testing, including:
 - A. Process information, e.g., type or product and operating rate.
 - B. Control system operating parameters during testing
- iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule
- v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- vi. Conclusions.
- f. The Permittee shall retain copies of emission test reports for at least five years beyond the date that an emission test is superseded by a more recent test.

3.3 Opacity Observations

- a. Upon written request by the Illinois EPA, the Permittee shall conduct opacity observations for specific affected operation(s) or unit(s) within 45 calendar days of the request or on the date agreed upon by the Illinois EPA, whichever is later.
- b. Opacity of emissions shall be determined during representative weather and operating conditions by a qualified observer in accordance with USEPA Test Method 9, as further specified below.
- c. The duration of opacity observations for each test shall be at least 30 minutes (five 6-minute averages) unless the average opacities for the first 12 minutes of observations (two six-minute averages) are both no more than half of the most stringent requirement applying to opacity.
- d.
 - i. The Permittee shall notify the Illinois EPA at least 7 days in advance of the date and time of these tests, in order to allow the Illinois EPA to witness testing. This notification shall include the name and employer of the qualified observer(s).
 - ii. The Permittee shall promptly notify the Illinois EPA of any changes in the time or date for testing.
- e. The Permittee shall provide a copy of its observer's readings to the Illinois EPA at the time of testing, if Illinois EPA personnel are present.

- f. The Permittee shall submit a written report for this testing within 15 days of the date of testing. This report shall include:
 - i. Date and time of testing.
 - ii. Name and employer of qualified observer, with a copy of his or her current certification.
 - iii. Description of observation condition, including recent weather.
 - iv. Description of the operating conditions of the affected operation or unit.
 - v. Opacity determinations, accompanied by raw data.
 - vi. Conclusions.
- g. The Permittee shall retain copies of test reports for at least three years after the date that a test is superseded by a more recent test.

3.4 Requirements for Records and Reports for Deviations

- a. Except as specified in a particular provision of this permit or as superseded in a subsequent CAAPP Permit, records for deviations from applicable requirements shall include at least the following information: the date, time and estimated duration of the event; a description of the event; the applicable requirement(s) that were not met; the manner in which the event was identified, if not readily apparent; the probable cause for deviation, if known, including a description of any equipment malfunction/breakdown associated with the event; information on the magnitude of the deviation, including, if appropriate, actual emissions or performance in terms of the applicable standard if measured or readily estimated; confirmation that standard procedures were followed or a description of any event-specific corrective actions taken; and a description of any preventative measures taken to prevent future occurrences, if appropriate.
- b. Notifications and reports for deviation from applicable requirements shall be submitted as follows:
 - i. Notification and reports for deviations emission standards and control requirements shall be submitted within 30 days of the deviation if not otherwise specified in a particular provision of this permit or in a subsequent CAAPP Permit.
 - ii. Notification and reports for deviations shall include the applicable information recorded under Condition 3.4(a).

- iii. Exceedances of applicable emissions standards or limitations during periods of startup, malfunction or breakdown, or shutdown shall be considered deviations for purposes of notification and reporting, even if exceedance of the standard or limitation is otherwise provided for by applicable rule or this permit.

ATTACHMENTS

ATTACHMENT 1: EMISSION TABLES

Table I: Annual Emissions Limitations for the Plant (Tons/Year)

Emission Units	NO _x	CO	VOM	PM	PM ₁₀ Total	SO ₂
Boilers	241.0	236.0	17.3	59.1	41.5	39.4
Fuel/Material Handling	---	---	---	0.42	0.33	---
Fly and Bed Ash Handling	---	---	---	0.7	0.7	---
Cooling Tower	---	---	---	0.9	0.3	---
Water Storage Tank Heater	0.3	0.3	0.1	0.1	0.1	---
Subtotal	241.3	236.3	17.4	61.2	42.9	39.4
Roadways ^a	---	---	---	0.5	0.4	---
Total	241.3	236.3	17.4	61.7	43.3	39.4

Notes:

a. Roadway emissions are fugitive emissions as defined by 35 IAC 203.124.

TABLE II: Emission Limitations for Each Boiler

Pollutant	Limitation	
	Pounds/Hour ^a	Tons/Year
CO	26.9	118.0
NO _x	27.6	120.5
SO ₂	4.5	19.7
PM ₁₀ (Filterable)	4.7	20.6
PM ₁₀ (Total)	6.8	29.8
VOM	2.0	8.7
Sulfuric Acid Mist	0.5	2.2
Hydrogen Chloride	0.5	2.2
Arsenic	0.025	0.11
Lead	0.025	0.11
Mercury	0.00000022	0.000001
Chromium	0.025	0.11
Cadmium	0.003	0.003
Acrolein	0.5	2.19
Benzo-a-pyrene	0.0000003	0.0000013
Polycyclic Aromatic Hydrocarbons	0.01	0.044
Dioxin/Furans	0.000000001	0.0000000044
Formaldehyde	0.87	3.81

Notes:

- a. Compliance with hourly emission limits shall be based on 24-hour block averages for NO_x, CO and SO₂ (for which continuous emissions monitoring is performed) and on 3-hour block averages for other pollutants.

ATTACHMENT 2 - STANDARD PERMIT CONDITIONS

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Illinois EPA and a supplemental written permit issued.
4. The Permittee shall allow any duly authorized agent of the Illinois EPA upon the presentation of credentials, at reasonable times:
 - a. To enter the Permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. To have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. To inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. To obtain and remove samples of any discharge or emissions of pollutants, and
 - e. To enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:
 - a. Shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. 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 proposed facilities.
 - c. Does not release the Permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations.
 - d. Does not take into consideration or attest to the structural stability of any units or parts of the project, and
 - e. 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 proposed equipment or facility.
- 6a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Illinois EPA before the equipment covered by this permit is placed into operation.
- b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Illinois EPA may file a complaint with the Board for modification, suspension or revocation of a permit.
 - a. Upon discovery that the permit application contained misrepresentations, misinformation or false statement or that all relevant facts were not disclosed, or
 - b. Upon finding that any standard or special conditions have been violated, or
 - c. Upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.



ROBBINS COMMUNITY POWER LLC

WOOD FUEL QUALITY CONTROL PLAN

Prepared For
ROBBINS COMMUNITY POWER
For the Facility Located At
13400 South Kedzie Avenue
Robbins, Illinois
February 2008

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GLOSSARY

Term	Definition
Contaminant	Any non-wood material or substance that is not naturally present in the wood and that is coating the wood, adhering to the surface of the wood, absorbed into the wood, or otherwise present in the wood, or any foreign materials commingled with the wood.
Contaminated Wood	Wood that has non-wood materials or substances that are not naturally present in the wood and that are coating the wood, adhering to the surface of the wood, absorbed into the wood, or otherwise present in the wood. Contaminated wood includes, but is not limited to, preserved wood, painted wood, laminated wood, particle board, and oil- or chemical-stained wood.
Final Grinding/Chipping	Grinding or chipping of wood to the RCP's size specification; generally smaller than 3 inches.
Foreign Materials	Non-wood contaminants that are commingled with mixed wood or unmixed wood (e.g., electrical wiring, metal and plastic objects, brick, stone, insulation, cardboard and paper).
Mixed Wood	<p>Wood that has been salvaged from waste or a waste stream defined in the Environmental Protection Act (415 ILCS 5) for processing into wood chip fuel; or</p> <p>Wood that has not been discarded or otherwise part of a waste stream defined in the Environmental Protection Act (415 ILCS 5) (e.g., construction or demolition debris, landscape waste) but that has been mixed with other materials prior to processing into wood fuel. Mixed wood may include wood that has been recovered from mixed recycled materials and recycled industrial wood including, but not limited to, used pallets, packing crates and dunnage, and wood generated by primary wood products industries (e.g., manufacturing of wood trusses, pallets).</p>

Mixed recycled material	Recycled materials containing wood that has been designated for recycling at industrial or commercial facilities as a part of a mixed-material recycling program.
Term	Definition
Originating Source	A provider of wood source materials to wood fuel processors who are Plan Participants. Originating sources also may be Plan Participants.
Plan Participant	Any person entering into a Wood Fuel Purchase Agreement with Robbins Community Power LLC to process mixed wood or unmixed wood into wood fuel in accordance with this Plan.
Person	Any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, political subdivision, state agency, or any other legal entity or their legal representative, agent or assigns.
Preserved Wood	Wood that has been treated with chemicals for protection from insects and/or the fungi that cause untreated wood to decay or rot (e.g., creosote-treated wood, surface-treated wood, pressure-treated wood).
Primary Shearing	Initial, rough shearing of wood source categories at a Plan Participant's facility. Primary Shearing reduces the size of the wood source material stream to manageable proportions; pieces of material are typically broken down into a 1 ½ foot to 2 foot sections, making it easier to separate materials. Not every Plan Participant utilizes Primary Shearing.
Rotten Wood	Any wood that evidences a state of decomposition and/or putrefaction and that exhibits an objectionable odor with a potential to cause nuisance air pollution.

Unmixed Wood	Wood that has been generated from tree trimmings, stump grindings, tree removal activities, land clearing, in-forest residue, and sawmill residue including, but not limited to, hogged bark, trim slabs, planer shavings, and sawdust. Unmixed Wood does not include wood from these or other sources that has been discarded or otherwise part of a waste stream defined in the Environmental Protection Act (415 ILCS 5) (e.g. landscape waste, construction or demolition debris) or that has potentially been mixed with contaminants prior to processing into wood fuel.
Term	Definition
Wood Fuel	Wood material that has been handled in accordance with the applicable requirements of this Plan to exclude prohibited materials and rotten wood, to remove all contaminated wood and foreign materials (or to prevent contaminated wood and foreign materials from being introduced into the wood material), and that has been inspected and determined to meet the quality specifications of this Plan.



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1.0 OBJECTIVE OF PLAN

Robbins Community Power LLC (RCP) has established inspection, sorting, processing, and testing procedures for wood fuel to be used as fuel at the RCP power plant, located in Robbins, Illinois. These procedures have been established as Best Management Practices, to ensure that wood fuel delivered to RCP is in accordance with the applicable permit and regulatory requirements. All persons supplying wood fuel to RCP are required to follow this Wood Fuel Quality Control Plan ("Plan"). The Plan also delineates the responsibilities and relationships of the Plan Participants (recycling/processing facilities and other suppliers).

This document specifies the method by which wood is collected, separated and processed and returned to the economic mainstream in the form of a product: wood fuel for beneficial reuse. The procedures described herein are also designed to remove contaminants, if present, from wood so as to render the wood reusable as fuel. The wood that is processed into fuel is wood that would otherwise be disposed of or discarded.

2.0 RESPONSIBILITIES AND RELATIONSHIPS OF PLAN PARTICIPANTS

RCP is ultimately responsible for the compliance with this Plan by Plan Participants and for compliance with applicable regulations and permits. To ensure compliance, RCP will inspect and audit Plan Participant operations. RCP has the authority to reject any wood fuel not in compliance with the procedures and specifications set forth in the Plan.

Every Plan Participant who becomes a supplier to RCP will be required to sign a "Wood Fuel Purchase Agreement". This Agreement contractually commits each Plan Participant to comply with the terms of this Wood Fuel Quality Control Plan. RCP will inspect processed wood fuel and will audit fuel supply operations in accordance with this Plan.

Originating sources provide unprocessed wood or unprocessed materials containing wood to processors who are Plan Participants. The relationship between originating sources, Plan Participants and RCP is shown graphically below, as Figure 1. The examples of the types of organizations included in each category are not intended to be all-inclusive.

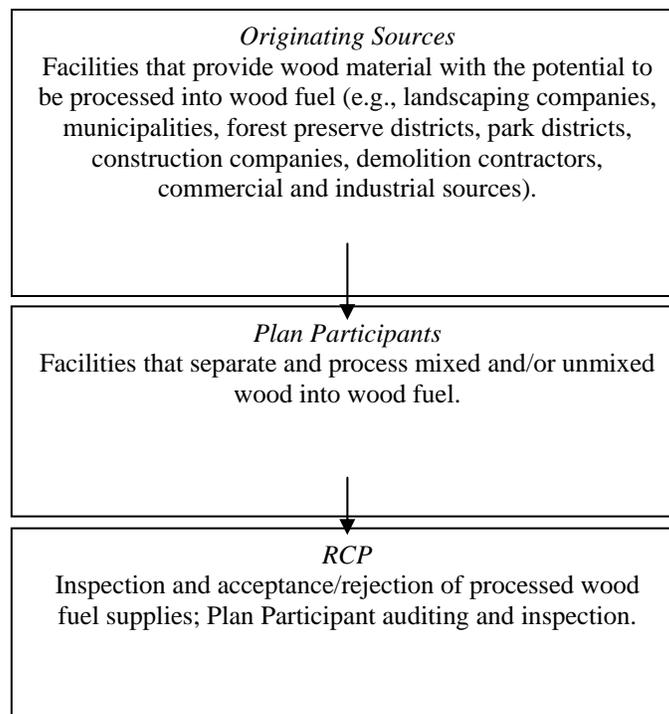


Figure 1
Fuel Procurement Relationships

Originating sources, including wood salvage operations, and Plan Participants, as a condition of their agreement with RCP, must comply with all applicable federal, state and local laws and must obtain permits if required by law.

3.0 DESCRIPTION OF WOOD SOURCES

This Plan recognizes two classifications of wood that may be processed into wood fuel for RCP by Plan Participants. The two classifications are mixed wood and unmixed wood. Each of these source categories is defined in the Glossary and may be divided into subcategories.

3.1 Mixed Wood

Mixed wood is primarily generated by a variety of construction and demolition activities including the construction of residential, commercial and industrial facilities; the demolition of residential and commercial buildings; and by landscape and lawn care activities and recycling activities at industrial and commercial facilities. Mixed wood must be processed through a Plan Participant in accordance with Section 4.0 of this Plan. Mixed wood includes the following subcategories:

3.1.1 Construction or Demolition Debris (415 ILCS 5/3.160)

This subcategory of wood is consists primarily of wood materials from residential and commercial construction projects and demolition debris. Demolition debris is generated at demolition sites and is typically accumulated by demolition companies and by waste haulers/landfills/ transfer stations.

3.1.2 Landscape Waste (415 ILCS 5/3.270)

This subcategory of wood consists of certain tree trimmings generated from the care of residential, commercial and public landscaping. Landscape waste that is acceptable for processing into wood fuel includes tree stumps, tree trunks, logs and tree branches. Landscape waste that is unacceptable for processing into wood fuel includes, but is not limited to, grass clippings, leaves, weeds or other types of landscape waste not listed here as acceptable.

3.1.3 Mixed Recycled Material

This subcategory of wood consists of wood that has been recovered from industrial and commercial mixed-material recycling programs.

3.1.4 Recycled Industrial Wood

This subcategory of wood is generated in a variety of ways. This may include, but is not limited to, wood derived from used pallets; packing crates and dunnage disposed by industrial users such as automobile manufacturers and suppliers; or wood generated by primary wood products industries (e.g., manufacturing of wood trusses, pallets).

3.2 Unmixed Wood

Unmixed wood is the second source category of wood that may be processed by Plan Participants into wood fuel. Unmixed wood must be processed through a Plan Participant in accordance with Section 5.0 of this Plan. It is possible

there will be some unmixed wood processed by Plan Participants who also process mixed wood. Unmixed wood includes the following subcategories:

3.2.1 Tree Trimmings

Tree trimmings that are not landscape waste (see Section 3.1.2) are unmixed wood generated from a variety of sources, including (but not limited to): tree service companies, municipalities, park districts, forest preserve districts and utilities. Tree trimmings include tree stumps, tree trunks, logs and tree branches, but do not include shrubbery, grass, leaves, clippings, weeds or other types of landscape waste.

3.2.2 Land Clearing/In-Forest and Sawmill Residue

This subcategory of unmixed wood includes wood generated by land clearing for urban development, in-forest residue generated in the harvest of timber, and sawmill residue generated in the manufacture of lumber, including hogged bark, trim slabs, planer shavings and sawdust.

4.0 PLAN PARTICIPANT INSPECTION, SORTING AND PROCESS PROCEDURES - MIXED WOOD

4.1 General Acceptance Policy

Illinois law recognizes that materials (such as wood) may be salvaged from waste or recovered from source-separated recyclables by removing all contaminants and processing the materials into raw materials or products in the economic mainstream (such as wood fuel). 415 ILCS 5/3.380. Under this Plan, Plan Participants are required to exclude loads with prohibited materials or rotten wood, to separate uncontaminated wood from the contaminated wood and foreign materials, and to process the uncontaminated wood remaining after separation into wood fuel.

RCP will not accept wood fuel from a Plan Participant unless the Plan Participant implements and maintains a separation and processing program that is designed to remove contaminated wood and foreign materials from the wood selected for use as fuel prior to final grinding/chipping and shipping to RCP. RCP's general separation and processing requirements for mixed wood are specified in this Section 4.0 and in Section 5.0 if unmixed wood also is processed at these facilities. Plan Participants will receive a copy of this Plan. Visual inspection procedures are described in Sections 4, 5, 6 and 7. Shipments of wood fuel that do not meet RCP's visual inspection protocol and standards at the RCP facility will not be accepted. Ownership of material entering the facility remains with the Plan Participant and transfers to RCP only after the material is formally accepted.

If the Plan Participant is found in accordance with Sections 6.0 and 7.4 to be in violation of RCP's General Acceptance Policy and the requirements of this Plan, the Plan Participant will be formally notified in writing of actions required to remedy the situation as provided in Section 7.4.3. Continuing violations of the same nature or a material violation of the Wood Fuel Purchase Agreement shall be just cause to terminate the Wood Fuel Purchase Agreement and to prohibit the Plan Participant from bringing loads to RCP.

4.2 General Requirements for Plan Participants

The following requirements apply to all Plan Participants for the processing of mixed wood:

4.2.1 Prohibited Materials

Wood that has been in contact with prohibited materials can not be processed into wood fuel. Loads of wood that are or have been in contact with prohibited materials must be rejected for processing into wood fuel. Prohibited materials are:

1. Hazardous waste as defined at 415 ILCS 5/3.220 and in implementing regulations;
2. Potentially infectious medical waste as defined at 415 ILCS 5/3.360 and in implementing regulations;
3. Landfill Waste, as defined at 415 ILCS 5/3.265;

4. Sludges from wastewater or water supply treatment plants, as defined at 415 ILCS 5/3.465;
5. Regulated Asbestos Containing Material, as defined at 40 C.F.R. 61.Subpart M (2006);
6. Nuclear or radioactive wastes.

4.2.2 Removal by Processing

Uncontaminated wood will be removed from foreign materials and contaminated wood (see Glossary) during processing, and the processor shall select uncontaminated wood for use as wood fuel. If, in the judgment of the Tip Floor Inspector, a load is determined to contain a type or quantity of foreign material or contaminated wood that cannot be separated in the processing system, then the load will be rejected for purposes of producing wood fuel. If uncontaminated wood can be effectively removed by manual sorting and picking and/or mechanical processing, the load may be processed.

4.2.3 Posting Signs for Unacceptable Materials

Signs will be posted in tipping and processing areas of the facility listing typical examples of prohibited materials (see Section 4.2.1), foreign materials (see Glossary) and contaminated wood (see Glossary).

4.2.4 Unmixed Wood

Unmixed wood may be processed directly into fuel in accordance with Section 5.0, if uncontaminated by foreign materials and contaminated wood.

4.2.5 Processing of Mixed Wood and Unmixed Wood at the Same Facility

Plan Participants processing both mixed wood and unmixed wood must ensure that the unmixed wood remains segregated throughout the entire process from delivery of the unprocessed wood to shipment of the final product to RCP. Unmixed wood that has been in contact with mixed wood must be processed in accordance with the procedures for mixed wood in this Section 4.0.

4.2.6 Rotten Wood

Each load of wood fuel transported to RCP must be free of rotten wood. Rotten wood is any wood that evidences a state of decomposition and/or putrefaction and that exhibits an objectionable odor with a potential to cause nuisance air pollution. Loads containing rotten wood will be rejected and will not be allowed to be unloaded on the RCP sites. In addition, RCP requires transporters to cover loads that exhibit an objectionable/ disagreeable odor.

4.2.7 Right of Access

Refusal to grant access to Illinois EPA inspectors is grounds to terminate an agreement between ECP and a Plan participant.

4.3 Specific Requirements for Quality Control and Processing Procedures

Each Plan Participant who processes mixed wood, alone or in combination with processing of unmixed wood, must institute Quality Control and Processing

Procedures that include the following: 1) Gate Inspection (Section 4.3.1); 2) Manual and Automatic Sorting Station Procedures including Screening (Section 4.3.3); 3) Final Grinding/Chipping (Section 4.3.4); 4) Final Inspection (Section 4.3.5); 5) Personnel Training(Section 4.3.6); 6) Recordkeeping (Section 4.3.7); and 7) Handling of Foreign Materials and Contaminated Wood (Section 4.3.8).

Plan Participants may also choose to use additional procedures, such as: 1) Tipping Floor/Conveyor Inspection Procedures (Section 4.3.2); 2) Primary Shearing (Section 4.3.4); 3) Magnetic Belt Sorting (Section 4.3.4); and other means of processing.

The main stations of material flow activity at each Plan Participant's site, and the corresponding quality control activity, include the following:

Material Flow Point	Quality Control and Processing Activity
Plan Participant's Gate	Load Inspection
Tipping floor	Tipping floor inspection and sorting; Oversized material identification and segregation; Removal of foreign materials and contaminated wood
Trommel (Screening Operations)	Removal of fines and material separation
Conveying/Sorting	Material removal and segregation; Sorting (visual inspection) and removal of uncontaminated wood from foreign materials and contaminated wood for processing of uncontaminated wood into wood fuel and disposal and recycling of foreign materials and contaminated wood.
Primary Shearing	Initial shearing
Magnetic Belt	Final removal of ferrous metals
Final (Secondary) Grinding/Chipping	Sizing material to specifications
Wood Storage/Transport	Final quality inspection at Plan Participant site

The order of Quality Control and Processing Activities can vary, depending on the design of a particular Plan Participant's facility. Each of these Quality Control and Processing Activities are described in more detail in the sections following.

4.3.1 Gate Inspection at Plan Participant's Site

A form or ticket must be completed and signed by the vehicle driver on behalf of the originating source. The form includes the originating source's name. The load is inspected for prohibited materials, rotten wood, foreign materials and contaminated wood, as described above. If it is determined that the load contains prohibited materials or rotten wood, the load will be rejected for processing into wood fuel. If it is determined that the load contains foreign materials or contaminated wood in types or quantities that cannot be removed in the processing system, the load will be rejected for

processing into wood fuel. Otherwise, the vehicle will be directed to proceed to the tipping area. During the gate inspection, the load type is classified to determine the applicable processing requirements. Load classifications are listed below and further described in Sections 3.1 and 3.2:

- Mixed wood
- Unmixed wood

4.3.2 Tipping Floor/Conveyor Inspections

Loads that pass the gate inspection will proceed to the tipping area. The truck will be directed to the appropriate staging area and the load will be tipped. A tipping floor inspection can serve as a front end separation point which prevents large pieces, foreign materials and contaminated wood from entering the processing system.

The load will be examined as it is tipped for conformance to acceptance specifications, and can be rejected at any point during tipping or after the material is spread on the tipping floor. The load classification will be confirmed or modified. If material unloaded onto the Plan Participant tipping floor is determined to contain prohibited materials or types or quantities of foreign materials and/or contaminated wood such that uncontaminated wood cannot be removed by the processing system, the load will be rejected for processing into wood fuel.

After the tip, an initial manual pick may commence through the materials, locating and removing oversized pieces, foreign materials and contaminated wood. Oversized materials may be segregated on the tipping floor for further pre-processing. Foreign materials and contaminated wood will be placed in designated areas either for disposal at an appropriate licensed landfill or for recycling.

Materials that have been accepted on the tipping floor will then be deposited on the conveyor by a bucket loader, grapple, or dozer. Any remaining materials that are deemed foreign materials, contaminated wood, or that are too large to "remove by processing" shall be identified at this point by equipment operators or inspectors and will be removed and staged for landfill disposal or recycling.

4.3.3 Manual and Automatic Sorting Stations

Materials that have been accepted on the tipping floor and deposited on the conveyor will proceed up the conveyor to sorting stations inside the facility. A trommel (or equivalent type of equipment) will be used to separate fines and soils before the materials proceed to sorting stations. A sorting station is a platform on which sorters stand and manually remove material from the moving conveyor, dropping it into a recycling staging area and/or disposal staging area. While tipping floor inspection serves as a sorting area to remove oversized pieces, foreign materials and contaminated wood, sorting stations allow for removal of uncontaminated wood and

separation of smaller pieces of foreign material and contaminated wood that may have bypassed separation on the tipping floor.

At the first Manual Sort Station, uncontaminated wood will be removed for processing into wood fuel and any remaining foreign material and contaminated wood will be identified by the sorters and will be separated and staged for disposal at an appropriate licensed landfill or for recycling.

The Plan Participant may also employ automatic sorting operations using devices such as water bath, air separators, etc. to remove pieces of non-ferrous metals, plastics, paper, rocks, dirt, etc. Plan Participants who utilize automatic sorting operations must also employ manual sorting operations as the final sorting step prior to final grinding/chipping, in order to ensure removal of uncontaminated wood for processing into wood fuel and separation from all foreign materials and contaminated wood for conformance with the General Acceptance Policy and the requirements of this Plan.

4.3.4 Primary Shearing; Magnetic Belt; Final Grinding/Chipping

Before or after sorting procedures (see Section 4.3.3), the inspected material may be processed by primary shearing. Primary Shearing, if performed, is designed to reduce material into smaller lengths so that manual sorting of the resulting material can be more easily performed. A magnetic belt or other sorting method will then be utilized to remove any small amounts of ferrous metals (such as nails, staples, etc.) that may have remained in the wood product after sorting. Plan Participants who use primary shearing in order to reduce the size of recycled materials prior to sorting, must also employ manual sorting as a final quality control step after primary shearing and prior to final grinding/chipping. After passing through the magnetic belt, and after sorting, the wood product will go through final grinding or chipping to meet RCP's size specifications. Final grinding/chipping must not take place before all inspection and sorting procedures have been completed.

4.3.5 Final Inspection

Prior to being loaded into transport vehicles, the wood fuel will be inspected by the Plan Participant. The procedures using the photographic standards outlined in Sections 6.0 and 7.4 will be utilized to ensure compliance with the fuel specification for RCP. Plan Participants must be familiar with these visual inspection procedures using the photographic standards and implement them as a final quality control check at each Plan Participant's facility. Shipments of wood fuel that do not meet RCP's visual inspection protocol and standards will not be accepted by RCP. Wood fuel not conforming with RCP's fuel specifications for wood fuel will be segregated for reprocessing for other uses or disposal, but will not be transported to RCP as wood fuel. The Plant Operator shall take appropriate corrective actions to prevent future re-occurrences.

4.3.6 Personnel Training

Plan Participant personnel will be trained in classifying loads and identifying prohibited materials, foreign materials and contaminated wood as

part of their orientation training. Periodic follow-up training and education will also be provided. Personnel will be trained to recognize prohibited materials, foreign materials and contaminated wood by appearance and to separate or reject them as required by this Plan.

Personnel training to classify loads and identify prohibited materials, foreign materials and contaminated wood must include observing representative loads running through the sorting system at the Plan Participant's facility. Periodic training of existing and new employees will be used to maintain the same quality control level.

4.3.7 Recordkeeping

Each hauler/supplier delivering mixed wood or unmixed wood to the Plan Participant will sign a form or ticket certifying the name of the originating source of the load. On-site record keeping procedures will be conducted to identify each load received at the Plan Participant according to its quantity, classification and origin. Each Plan Participant supplying wood fuel to RCP shall maintain the following records:

Load Identification

- Name of the Plan Participant
- Name of originating source
- Name of transporter and driver
- Cubic volume or weight and classification of wood type in incoming load
- Time and date of incoming load
- Rejected load and reason for rejection

Quality Control of Load at Plan Participants

- Copies of RCP correspondence to Plan Participant about problems with material quality
- Corrective action taken by Plan Participant providing "Borderline Acceptable" or "Unacceptable" loads

4.3.8 Handling of Foreign Materials and Contaminated Wood

Foreign materials and contaminated wood are removed through both mechanical and manual methods described above. Many of these materials also have value as recycled products. When managing these materials, Plan Participants maintain responsibility for complying with applicable local, state and federal laws and regulations.

5.0 PLAN PARTICIPANT PROCESS AND INSPECTION PROCEDURES - UNMIXED WOOD

This Section 5.0 applies to Plan Participants processing unmixed wood into wood fuel for RCP. Plan Participants may process unmixed wood exclusively or may process unmixed wood in addition to the processing of mixed wood in accordance with Section 4.0 and this Section 5.0. The following requirements are expressly incorporated into this Section 5.0 and apply to Plan Participants processing unmixed wood: General Acceptance Policy (Section 4.1); General Requirements for Plan Participants (Sections 4.2.1, 4.2.4, 4.2.5, 4.2.6, 4.2.7).

Plan Participants will receive a copy of this Plan. Visual inspection procedures are described in Sections 4, 5, 6 and 7. Shipments of wood fuel that do not meet RCP's visual inspection protocol and standards at the RCP facility will not be accepted. Ownership of material entering the facility remains with the Plan Participant and transfers to RCP only after the material is formally accepted.

5.1 Requirements for Processing and Inspection

5.1.1 Gate or Tipping Floor Inspection

A form or ticket must be completed and signed by the vehicle driver on behalf of the originating source. The form includes the originating source's name. Plan Participants receiving and processing unmixed wood into wood fuel for RCP must perform gate and/or tipping floor inspections to verify the load classification as unmixed wood by confirming the absence or presence of prohibited materials, foreign materials and/or contaminated wood. If prohibited materials, foreign materials or contaminated wood are identified, the load will be rejected as provided under Sections 4.2.1 or 4.2.3 or redirected to processing under the mixed wood procedures in Section 4.0. If not, the load may proceed to final grinding/chipping into wood fuel. Final grinding/chipping must not take place before all inspection procedures have been completed.

5.1.2 Segregation of Load Classifications

Unmixed wood is much less likely to contain contaminants than mixed wood. To preserve this characteristic, Plan Participants who process both mixed wood and unmixed wood must ensure that unmixed wood remains segregated from mixed wood from the delivery of the unprocessed wood to shipment of the final product to RCP. Unmixed wood that has been in contact with mixed wood must be processed in accordance with the procedures for mixed wood in Section 4.0.

5.1.3 Final Inspection

Prior to being loaded into transport vehicles, the wood fuel will be inspected by the Plan Participant. The procedures using the photographic standards outlined in Sections 6.0 and 7.4 will be utilized to ensure compliance with the fuel specification for RCP. Plan Participants must be familiar with these visual inspection procedures using the photographic standards and implement them as a final quality control check at each Plan Participant's facility. Shipments of wood fuel that do not meet RCP's visual

inspection protocol and standards will not be accepted by RCP. Wood fuel not conforming with RCP's fuel specifications for wood fuel will be segregated for reprocessing for other uses or disposal, but will not be transported to RCP as wood fuel. The Plant Operator shall take appropriate corrective actions to prevent future re-occurrences.

5.2 Other Requirements

5.2.1 Personnel Training

Plan Participant personnel will be trained in classifying loads and identifying prohibited materials, foreign materials and contaminated wood as part of their orientation training. Personnel will be trained to recognize prohibited materials, foreign materials and contaminated wood by appearance and to separate or reject them as required by this Plan. Periodic training of existing and new employees will be used to maintain the same quality control level.

5.2.2 Recordkeeping

Each hauler/supplier delivering unmixed wood to the Plan Participant will sign a form or ticket certifying the name of the originating source of the load. On-site record keeping procedures will be conducted to identify each load received at the Plan Participant according to its quantity, classification and origin. Each Plan Participant supplying wood fuel to RCP shall maintain the following records:

Load Identification

- Name of the Plan Participant
- Name of originating source
- Name of transporter and driver
- Cubic volume or weight and classification of wood type in incoming load
- Time and date of incoming load
- Rejected load and reason for rejection

Quality Control of Load at Plan Participants

- Copies of RCP correspondence to Plan Participant about problems with material quality
- Corrective action taken by Plan Participant providing "Borderline Acceptable" or "Unacceptable" loads

6.0 RCP INSPECTION AND AUDITING PROCEDURES

Every load received from each Plan Participant at RCP will be visually inspected. The load will be compared to the photographic standards using the procedures detailed in this Section and Section 7.4. The load will then be classified in one of two categories:

6.0.1 Acceptable Loads

If no foreign materials or contaminated wood are detected in an incoming load upon inspection and if the load matches the visual appearance of acceptable wood fuel, based on the standardized photographs in Appendix A, the load is classified as "Acceptable." The driver may proceed directly to one of two stackout piles to unload the shipment.

Visual inspections will be conducted twice per load: at the gate and after the load is tipped. If foreign materials or contaminated wood are detected in an incoming load in incidental amounts that can be easily removed by an operator at RCP so that the load matches the visual appearance of "Acceptable" wood fuel, based on the standardized photographs in Appendix A, RCP may use contingency procedures to remove the incidental amounts of contaminants. Contingency procedures require that the borderline load be moved to a designated final inspection area, where RCP operators will remove foreign materials and contaminated wood from the load. If the operator at any time determines that Foreign Materials and Contaminated Wood can not be effectively removed, the load will be rejected.

When foreign materials and contaminated wood have been removed and the borderline load matches the visual appearance of "Acceptable" wood fuel, the driver may proceed to the appropriate stackout pile to unload the shipment. Any load containing identifiable foreign materials or contaminated wood that is received at RCP (regardless of whether the foreign materials or contaminated wood were removed by RCP) must be identified in the facility's operating record as "Borderline Acceptable" and will be used to determine when the Plan Participant is subject to additional training and inspections.

6.0.2 Unacceptable Loads

If foreign materials or contaminated wood are detected in an incoming load that cannot be easily removed by an operator at RCP in accordance with the contingency procedures in Section 6.0.1 above, the load is classified as "Unacceptable" and cannot be accepted at RCP. Loads containing prohibited materials (Section 4.2.1) or rotten wood (Section 4.2.6) also will be rejected.

6.1 Wood Chip Fuel Acceptance Procedures at RCP

At the RCP gate or truck scale, wood fuel in each load will be visually inspected regardless of the material source. Prior to directing the driver to tip the load into the appropriate stackout pile, the RCP Operator will inspect the load for any nonconformances with RCP's fuel specifications as described in the General Acceptance Policy and the requirements of this Plan.

At the tipping area, wood fuel in each load will be visually inspected again. Prior to accepting the load and transferring it to the appropriate stackout pile, the RCP Operator will inspect the load for any nonconformances with RCP's fuel specifications as described in the General Acceptance Policy and the requirements of this Plan.

Contracts between RCP and Plan Participants will state that all material delivered to RCP must meet RCP's fuel specifications as described in the General Acceptance Policy and the requirements of this Plan.

6.2 Mixed Wood and Unmixed Wood Plan Participant Inspection

This Section applies to Plan Participants accepting mixed wood whether or not unmixed wood also is processed at the facility. RCP's contract with Plan Participants will provide that RCP representatives may enter a Plan Participant's site and building at any time during Plan Participant operating hours to inspect and verify that the material inspection and operating procedures are being followed to produce a product that meets RCP's fuel specifications. RCP will inspect each Plan Participant's facility at least twice per calendar year but more often for Plan Participants that have supplied "Borderline Acceptable" or "Unacceptable" loads. Notices of violations of this Plan, concerns of RCP and recommendations for corrective action will be made in writing by RCP, delivered to the Plan Participant no later than five days subsequent to the inspection, and retained in RCP's environmental compliance records along with records of on-site inspections.

6.3 Unmixed Wood Plan Participant Inspection

This Section applies to those Plan Participants accepting only unmixed wood for processing into wood fuel. RCP's contract with Plan Participants will provide that RCP representatives may inspect, at any time during Plan Participant operating hours, each Plan Participant who maintains only unmixed wood supplier operations and verify that the material inspection and operating procedures are being followed to produce a product that meets RCP's fuel specifications. RCP will inspect each unmixed wood Plan Participant's facility at least once per calendar year but more often for Plan Participants that have supplied "Borderline Acceptable" or "Unacceptable" loads. Notices of violations of this Plan, concerns of RCP and recommendations for corrective action will be made in writing by RCP, delivered to the unmixed wood Plan Participant no later than five days subsequent to the inspection, and retained in RCP's environmental compliance records.

6.4 Recordkeeping

RCP will keep records of its activities as provided in this Section or elsewhere in this Plan. Records will be available to the Illinois Environmental Protection Agency or any local jurisdiction inspector upon request.

6.4.1 Load Identification at RCP

- Name of transporter and driver, by load
- Name of Plan Participant
- Net weight and classification of wood type in incoming load

- Time and date of incoming load

6.4.2 *Quality Control of Load at RCP*

- Name of inspectors for incoming load (gate, tipping)
- Classification of wood type in incoming load
- Identification of Plan Participant
- Results of comparison with photographic standard ("Acceptable," "Borderline Acceptable," or "Unacceptable")
- Identification of Plan Participant not meeting quality standards
- Number of "Borderline Acceptable" and "Unacceptable" loads received within the last six-month period by each Plan Participant
- Copies of correspondence to Plan Participant about problems with material quality
- Corrective action taken by Plan Participant providing "Borderline Acceptable" or "Unacceptable" loads

6.4.3 *Quality Control of Fuel Pile*

The following data will be recorded on a daily basis to track the inventory in the unmixed wood area, the mixed wood area and the reclaim pile:

- Average age of the Reclaim Pile
- Average age of the unmixed (Indoor) Wood Area
- Average age of the mixed (Outdoor) Wood Area
- Current total of wood, in tons, in the Indoor and Outdoor Wood Areas
- Current total of wood, in tons, in the Reclaim Pile
- Total wood burned per day, in tons

6.4.4 *Monthly Reports at RCP - General*

This data will be presented in a report that lists the following information:

- Total deliveries, in tons
- Total consumption, in tons
- Month end inventory, in tons
- Amount of incoming material rejected, including date of rejection and date of Removal

6.4.5 *Monthly Reports at RCP - Regarding Plan Participants (Suppliers)*

This data will be presented in a report that lists the following information:

- Amount of delivered material
- Amount of material rejected/disposed/recycled

6.4.6 *Inspection Reports*

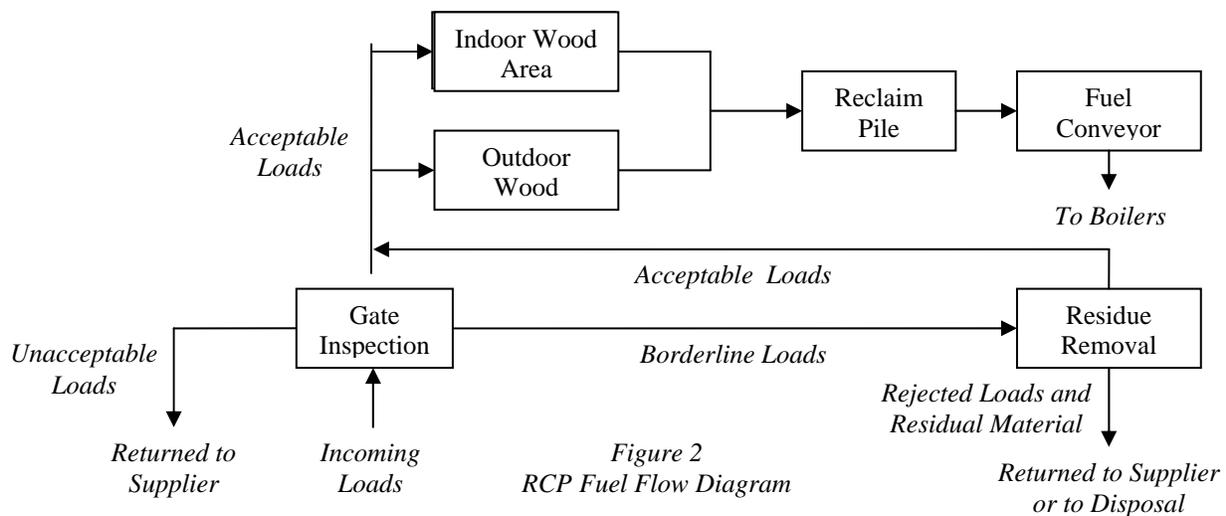
Field inspections of Plan Participant facilities will be documented in written reports. Monitoring of any corrective or remedial action will also be maintained in written form.

6.5 Wood Fuel Handling and Storage

Wood fuel will be received at RCP in trailer trucks that will be unloaded by an operator using a hydraulic truck dumper or by trucks equipped with "walking floors". The trailer loads will either be dumped into a hopper or directly discharged to the ground. The wood fuel will be transferred by conveyor or by a loader to one of the two load-out stacker piles: the Indoor Wood Area and the Outdoor Wood Area. The Outdoor Wood Area stacker is designed to enable the plant to easily operate the FIFO inventory control system.

There will be three wood fuel storage areas maintained at RCP, the two piles described above and the reclaim pile. The reclaim pile will contain a blend of wood fuel from the Indoor Wood Area and the Outdoor Wood Area, which will then be fed into RCP's two boilers. RCP's fuel management system assures the first wood onto the pile is the first wood into the boiler. The Outdoor Wood Area will be maintained using a radial stacker and loaders. The Indoor Wood Area will be maintained in a fuel storage building.

The operator will vary the height of storage piles as required to minimize the footprint of the piles and help assist in eliminating odors from biological decomposition. In addition to reducing the rate of decomposition, RCP's fuel management system provides the plant with drier fuel, which improves boiler efficiency. The following diagram illustrates fuel flow and storage at RCP:



6.5.1 Fuel Inventory

The maximum inventory of fuel on site at any one time will be no more than three months storage of fuel, or less than 95,000 tons.

7.0 WOOD FUEL SAMPLING AND INSPECTION PROTOCOL

7.1 Scope

The sampling and inspection methods described herein have been established as Best Management Practices. Wood fuel is received from Plan Participants as fuel at RCP. RCP will not accept at its facility wood fuel which does not meet the fuel specifications as described in the General Acceptance Policy and the requirements of this Plan.

7.2 Significance and Use

The sampling and inspection procedures described are used to determine that the wood fuel meets the fuel specifications as described in the General Acceptance Policy and the requirements of this Plan.

7.3 Apparatus

7.3.1 Gate Inspection Stand

The gate inspection stand will consist of a raised platform, located at RCP's gate, which will allow a trained RCP operator to visually inspect the contents of each truck load of wood fuel.

7.3.2 Standard Photographs

A minimum of three standard photographs of "Acceptable" wood fuel shall be provided that 1) contain a scale marked in inches in both dimensions; 2) have been taken in color and perpendicular to the processed wood fuel; 3) are of sufficient resolution to provide a clear picture of the wood chips at actual size; and, 4) show the wood chips at actual size. These photographs will be used for evaluation of wood fuel. Proposed standard photographs are attached, as Appendix A. Copies of the approved photographs will be provided to the Illinois EPA and any local jurisdiction with a working agreement with the Illinois EPA. Copies of the approved photographs also will be given to the on-site RCP inspectors and all Plan Participants who supply wood fuel to RCP. RCP will instruct Plan Participants in the use of the standard photographs for final inspections at Plan Participant facilities.

Acceptable wood fuel from different source categories that is processed to final size using chipping or grinding may vary significantly in appearance. Therefore, three standard photographs may be prepared for each category (e.g., chipped mixed wood; ground mixed wood; chipped unmixed wood; and ground unmixed wood).

7.3.3 Tipping Area Video System

A video monitoring system will be located at each tipping area. This system shall include a video camera capable of examining each load of wood fuel after tipping and producing images of sufficient quality to compare to the standard photographs and a monitor which will allow a trained RCP operator to view the load after tipping and compare the video images to the standard photographs.

7.4 Wood Fuel Inspection Procedure

The RCP inspection procedures for incoming wood fuel will consist of two visual inspections, a gate inspection and a tipping area inspection. The initial inspection will be a visual comparison of the standard photographs of "Acceptable" wood fuel and the wood fuel load. This inspection shall be made at the gate receipt area. If the load is deemed "Acceptable," the load shall proceed to the designated tipping area. If the load is deemed "Unacceptable", the load shall be rejected. If the load is deemed "Borderline", the load shall proceed to the designated final inspection area, where it will be tipped and contingency procedures will be implemented in accordance with Section 6.0.

The second inspection will be a visual comparison of the standard photographs of "Acceptable" wood fuel and the wood fuel load. This inspection shall be made after the wood fuel is unloaded at the tipping area using the Tipping Area Video System described in Section 7.3. If the load is deemed "Acceptable," the load shall be directed to the appropriate stackout pile. If the load is deemed "Unacceptable", the load shall be rejected. If the load is deemed "Borderline", the load shall proceed to the designated final inspection area, where it will be tipped and contingency procedures will be implemented in accordance with Section 6.0.

The following diagram graphically describes inspection procedures:

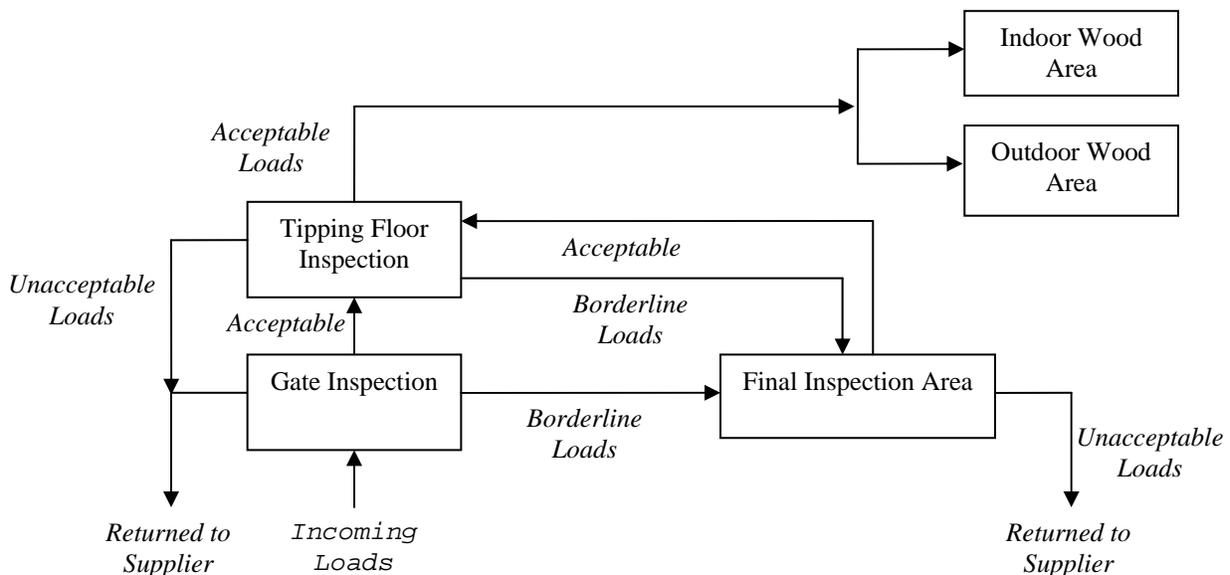


Figure 3
Inspection Flow Chart

7.4.1 Recording Results

Records of fuel inspections and evaluations will be kept on a standard data sheet and maintained in RCP's environmental compliance file.

7.4.2 Frequency of Sampling and Inspection

RCP will sample, inspect, and evaluate every load of wood fuel delivered to RCP.

7.4.3 Wood Fuel Load Rejection Corrective Action Measures

RCP will not accept as fuel any load that is rated "Unacceptable." RCP will verbally notify the affected Plan Participant immediately, no later than the next business day, and follow-up in writing no more than five days subsequent to any "Borderline Acceptable" load accepted or rejected at RCP or any "Unacceptable" load rejected at RCP. If, within six months or less, three "Borderline Acceptable" loads are accepted or rejected or two "Unacceptable" loads are rejected, RCP will work with the Plan Participant to diagnose problem areas and improve the quality of wood fuel produced by the Plan Participant. The Plan Participant will be required to take appropriate corrective action measures, which, at a minimum, will include retraining of staff responsible for the substandard loads and also may include changes to procedures, equipment, or both as recommended by RCP to comply with wood fuel requirements.

7.4.4 Re-inspection

If there is a disagreement between parties with respect to the visual observations and evaluation results recorded by an inspector, there will be an opportunity for re-inspection by a panel of representatives from RCP and the Plan Participant.

7.4.5 Records

All records will be made available to the IEPA or local jurisdiction inspectors for inspection and copying upon request.

Respectfully submitted,
ROBBINS COMMUNITY POWER

Edward C. Kalebich
Chief Operating Officer
EK/rjt

Appendix A

Acceptable Photographs







ATTACHMENT 4: ACID RAIN PERMIT

217-782-2113

ACID RAIN PROGRAM PERMIT

Robbins Community Power LLC
Attn: Edward C. Kalebich
13400 South Kedzie Avenue
Robbins, Illinois 60472

Oris No.: 56576
Illinois EPA I.D. No.: 031270AAB
Source/Unit: RCP/Boilers 01 and 02
Date Received: August 17, 2007
Date Issued: June 23, 2008
Effective Date: January 1, 2008
Expiration Date: December 31, 2012

STATEMENT OF BASIS:

In accordance with Section 39.5(17)(b) of the Illinois Environmental Protection Act and Titles IV and V of the Clean Air Act, the Illinois Environmental Protection Agency is issuing this Acid Rain Program permit to Robbins Community Power LLC.

SULFUR DIOXIDE (SO₂) ALLOCATIONS AND NITROGEN OXIDE (NO_x) REQUIREMENTS FOR EACH AFFECTED UNIT:

Boilers Units 01 and 02	SO ₂ Allowances	These units are not entitled to an allocation of SO ₂ allowances pursuant to 40 CFR Part 73.
	NO _x Emission Limitation	These units are not subject to a NO _x emissions limitation pursuant to 40 CFR Part 72.

PERMIT APPLICATION: The permit application, which includes SO₂ allowance requirements and other standard requirements, incorporated as part of this permit. The owners and operators of this source must comply with the standard requirements and special provisions set forth in the application.

COMMENTS, NOTES AND JUSTIFICATIONS: This permit contains provisions related to SO₂ emissions and requires the owners and operators to hold SO₂ allowances to account for SO₂ emissions from the affected units. An allowance is a limited authorization to emit up to one ton of SO₂ during or after a specified calendar year. The affected units are new units and there is no allowance allocation for new units by USEPA. Although these units are not eligible for an allowance allocation by USEPA, the owners or operators through their designated representative must obtain SO₂ allowances to cover emissions in accordance with the SO₂ allowance system requirements of 40 CFR Part 73. The transfer of allowances to and from a unit account does not necessitate a revision to the unit SO₂ allocations denoted in this permit (See 40 CFR 72.84). This permit contains provisions related to NO_x emissions and requires the owners and operators to monitor NO_x emissions from affected units in accordance with

applicable provisions of 40 CFR Part 75. These units are not subject to a NO_x emission limitation because USEPA has not adopted such limitation for fluidized bed boilers.

This Acid Rain Program permit does not authorize the construction and operation of the affected units as such matters are addressed by Titles I and V of the Clean Air Act. This permit also does not affect the source's responsibility to meet all other applicable local, state and federal requirements, including 35 IAC Part 225, Subparts C, D, and E.

If you have any questions regarding this permit, please contact Bob Smet at 217/782-2113.

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

ECB:RPS:jws

cc: Beth Valenziano, USEPA Region V
FOS - Region 1, Illinois EPA