

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF AIR

*DIVISION of AIR POLLUTION CONTROL*

*PERMIT SECTION*

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

CITGO Petroleum Corporation  
2316 Terminal Drive  
Arlington Heights, Illinois 60005

Illinois EPA ID Number: 031804AAM

Application Number: 95060051

Application Type: Renewal Permit

Start of Public Comment Period: 09/12/2007

Close of Public Comment Period: 10/12/2007

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

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

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

## I. INTRODUCTION

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

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

## II. GENERAL SOURCE DESCRIPTION

### a. Nature of Source

The CITGO Petroleum Corporation (CITGO) Arlington Heights Terminal has its main office at 2316 Terminal Drive, Arlington Heights, IL 60005. The source is a bulk petroleum storage and distribution terminal for various petroleum products. Petroleum products are brought in via pipeline and tanker truck and are temporarily stored prior to distribution. Product is distributed to different destinations via pipeline or distributed to gasoline retail operations by way of tanker truck. Truck loading racks are used for this purpose.

Illinois EPA previously issued separate CAAPP permits for the two adjacent petroleum storage and distribution terminals known as the CITGO Mt. Prospect Terminal, located at 2316 Terminal Drive, Arlington Heights, Illinois (ID No. 031804AAM - CAAPP No. 95060051) and P.D.V. Midwest Refining (PDVMR) Des Plaines Terminal, at 2304 Terminal Drive, Mt. Prospect, Illinois 60056 (ID No. 031804AAL - CAAPP No. 95060124). Both facilities are operated by the CITGO Petroleum Corporation and are considered to be a single source for CAAPP and Title I of the Clean Air Act purposes.

For operational reasons, CITGO Petroleum Corporation has elected to "incorporate" the Mt. Prospect and Des Plaines facilities into a single CAAPP permit which will be known as the CITGO Arlington Heights Terminal. To facilitate this incorporation, tank number

and equipment designations for the equipment covered under this CAAPP permit have been changed as indicated in Attachment 5.

With the exception of the re-designation of equipment, indicated above, and the change in source wide throughput limits shown in Section 5.6, this permit incorporates by reference the information shown in the applications for the two previously issued CAAPP permits (i.e., CAAPP No. 95060051 and 95060124).

b. Ambient Air Quality Status for the Area

The source is located in an area that is currently designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment) and/or PM<sub>2.5</sub> and attainment or unclassifiable for all other criteria pollutants carbon monoxide, lead, nitrogen dioxide, PM<sub>10</sub>, and sulfur dioxide.

c. Major Source Status

The source requires a CAAPP permit as a major source of volatile organic material (VOM). (See Section 5.1)

d. Source Emissions

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

Pollutant	Annual Emissions (tons)				
	2001	2002	2003	2004	2005
CO	--	--	--	--	--
NO <sub>x</sub>	--	--	--	--	--
PM	--	--	--	--	--
SO <sub>2</sub>	--	--	--	--	--
VOM	61.20	57.00	60.30	70.95	77.63
(top HAP)	--	--	--	--	--

It should be noted that the above reflects the total combined emissions reported in the Annual Emissions Reports submitted for the co-located CITGO Mt. Prospect Terminal, (ID No. 031804AAM) and P.D.V. Midwest Refining (PDVMR) Des Plaines Terminal (ID No. 031804AAL).

III. NEW SOURCE REVIEW/TITLE I CONDITIONS

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

deletes them. Where the source has requested that the Illinois EPA establish new conditions or revise such conditions in a Title I permit, those conditions are consistent with the information provided in the CAAPP application and will remain in effect pursuant to Title I provisions until such time that the Illinois EPA revises or deletes them.

This draft permit would establish new Title I requirements and newly revised Title I requirements.

This permit consolidates and merges previous set Title I limits shown in the previous CAAPP permits for the two facilities shown above.

#### IV. COMPLIANCE INFORMATION

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

#### V. PROPOSED ILLINOIS EPA ACTION/REQUEST FOR COMMENTS

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

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

ATTACHMENT 1: Summary of Source-Wide Requirements

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

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

1. The ERMS is a market-based program designed to reduce VOM emissions from stationary sources located in the Chicago ozone non-attainment area in order to contribute to reasonable further progress toward attainment (35 IAC Part 205). If applicable, this program is further described in Section 6.0 of the draft permit, including the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS.
2. Compliance Assurance Monitoring (CAM) is a program for pollutant-specific emission units which use an add-on control device to achieve compliance with an emission limitation or standard. A CAM plan is required for such units that have potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than major source threshold levels, and are not specifically exempt by 40 CFR Part 64. Subject units and the CAM plans are identified in Attachment 3 of the draft permit.

<b>Source Wide Conditions - Section 5.0</b>	
<b>Applicable Rules and Requirements</b>	
Emission Standards (See Section 5.3) - Subsections of interest include but are not limited to	<ul style="list-style-type: none"> <li>Section 5.3.3 - 35 IAC 218.585: Gasoline Volatility Standards</li> </ul>
Source-Wide Control Requirements and Work Practices (Section 5.5 and 5.6.3)	<ul style="list-style-type: none"> <li>A VOL containing vinyl chloride or benzene in excess of 2 percent by weight. (Non-applicability (Section 5.4))</li> <li>Leak Inspections (Permit shield provisions in Condition 5.13)</li> <li>Storage of a threshold quantity (See 40 CFR 68.115(a)) of a regulated substance listed in 40 CFR 68.130 (Non-applicability (Section 5.4))</li> <li>Limit total HAP emissions from the affected loading racks and associated vapor recovery units (See Section 7.6) to less than 35 milligrams per liter of material loaded (Non-applicability (Section 5.4))</li> <li>Limit MTBE concentration of reformulated and conventional gasoline at the source to less than 11.9% (Non-applicability (Section 5.4))</li> </ul>
Title I Conditions (Section 5.6.3(c))	<ul style="list-style-type: none"> <li>Gasoline throughput and facility wide VOM limit (Permit 05020060)</li> </ul>
Non-applicability (Section 5.4)	<ul style="list-style-type: none"> <li>40 CFR 63, Subpart R, Y, and OOO: Aggregate HAP emissions from the source less than 10 tons of each individual HAP and 25 tons for all HAPs. (See also Condition 5.6.2)</li> <li>40 CFR 61, Subpart J and V: The pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels and storage tanks at the source are not in benzene service or volatile hazardous air pollutant service as defined in 40 CFR 61.111 and 61.241, respectively. (See also Condition 5.5.1)</li> <li>Chemical Accident Prevention in 40 CFR Part 68: The source does not meet the applicability threshold quantity criteria shown in 40 CFR 68.10. (See also Condition 5.6.3)</li> <li>35 IAC 212.302 through 212.216 and 35 IAC Part 212, Subpart U: The source does not meet the applicability requirements shown in the respective sections.</li> </ul>
<b>Periodic Monitoring (other than basic regulatory requirements)</b>	
Testing (Section 5.7)	<ul style="list-style-type: none"> <li>General Testing Provisions</li> <li>Gasoline Volatility Standards (35 IAC 218.585)</li> </ul>

**Source Wide Conditions - Section 5.0**

**Applicable Rules and Requirements**

Emissions and Operational Monitoring (Section 5.8)	None
Recordkeeping (Section 5.9)	<ul style="list-style-type: none"><li>• Annual Emission Records</li><li>• General Records for Storage Tanks</li><li>• Records for Floating Roof Storage Tanks</li><li>• Records for Operating Scenarios</li><li>• Records for Pump and Compressor Inspections</li><li>• Gasoline Volatility Standards</li><li>• Records for VOM and HAP Emissions</li></ul>
Other	Flexibility: Storage of materials with a vapor pressure less than 0.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any storage tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Section 7.0 of this permit applicable to such tank based on the storage of VPL shall no longer apply.
<b>Reporting</b>	
Prompt Reporting (Section 5.10.1)	30 days: Deviations of the source with the permit requirements
Other Reporting (Section 5.10.2)	<ul style="list-style-type: none"><li>• Annual Emissions Report</li><li>• Annual Reporting of HAP</li></ul>

ATTACHMENT 2: Summary of Requirements for Specific Emission Units

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

Table 1 (Section 7.1 of the draft permit)

<b>Emission Unit</b>	
Name	Group 1 Storage Tanks Fixed roof storage tanks with a capacity of less than 40,000 gallons, which store various organic liquids including ethanol with a true vapor pressure of less than 17.24 kPa (2.5 psia)
Description	Fixed roof storage tanks with a capacity of less than 40,000 gallons, which store various organic liquids including ethanol with a true vapor pressure of less than 17.24 kPa (2.5 psia)
Date Constructed	(See Attachment 6)
Emission Control Equipment	(See Attachment 6)
<b>Applicable Rules and Requirements</b>	
Emission Standards	<ul style="list-style-type: none"> <li>• 35 IAC 218.119(g): Fixed roof storage tanks with a capacity of less than 40,000 gallons</li> </ul>
Title I Conditions	<ul style="list-style-type: none"> <li>• The draft permit contains limits on operation and emissions in Conditions 7.1.6. These limits were incorporated from Permit 95060051 and the limits from the previous CAAPP permit 95060051.</li> <li>• Changes from the previous CAAPP permit include an increase in the monthly emissions limitations in order to correct the previous emissions limit which previously did not account for the increase in emissions experienced due to an increase in typical seasonal temperatures</li> </ul>
Non-applicability	<ul style="list-style-type: none"> <li>• 35 IAC 218.120, 218.121 and 218.123: Tank capacities are less than 40,000 gallons</li> <li>• 35 IAC 218.122(b): No odor nuisance exists and the tanks are used to store organic liquid with a maximum true vapor pressure of less than 17.24 kPa</li> <li>• 35 IAC Part 218, Subpart QQ or TT: Tanks are subject to 35 IAC 218, Subpart B</li> <li>• 40 CFR 60 Subparts K, Ka, or Kb: Tanks were constructed prior to the applicability dates of each NSPS</li> </ul>
<b>Periodic Monitoring (other than basic regulatory requirements)</b>	
Testing	None

Emissions Monitoring	None
Operational Monitoring	None
Inspections	None
Recordkeeping	Organic liquid throughput and vapor pressures and VOM emissions
Other	Flexibility: Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.1.
<b>Reporting</b>	
Prompt Reporting	5 days: Storage of organic liquid with a vapor pressure in excess off the 15 kPa (2.1 psia) in Condition 7.1.6 30 days: Exceedance of the emission and operational limits shown in Conditions 7.1.6.

Table 2 (Section 7.2 of the draft permit)

<b>Emission Unit</b>	
Name	Group 2 Storage Tanks Fixed Roof Storage Tanks With a Capacity Greater Than 40,000 Gallons
Description	Fixed roof storage tanks used to store distillate fuels
Date Constructed	(See Attachment 6)
Emission Control Equipment	(See Attachment 6)
<b>Applicable Rules and Requirements</b>	
Emission Standards	<ul style="list-style-type: none"> <li>None</li> </ul>
Title I Conditions	<ul style="list-style-type: none"> <li>The draft permit contains limits on operation and emissions in Conditions 7.2.6. These limits were incorporated from previous CAAPP permit 95060051.</li> <li>Changes from the previous CAAPP permit include an increase in the monthly emissions limitations in order to correct the previous emissions limit which previously did not account for the increase in emissions experienced due to an increase in typical seasonal temperatures</li> </ul>
Non-applicability	<ul style="list-style-type: none"> <li>40 CFR 60 Subparts K, Ka, or Kb: Tanks exclusions and or exemptions stipulated in each NSPS</li> </ul> <p>It should be noted that Tank T106 is no longer subject to the requirements of 40 CFR 60 Subpart Kb since it no longer meets the NSPS applicability criteria (See Condition 7.2.4(a)).</p> <ul style="list-style-type: none"> <li>35 IAC 218.120: Vapor pressure of VOLs stored in the tank is less than 0.75 psia (See Condition 7.2.6).</li> <li>35 IAC 218.121 and 218.123: Vapor pressure of VOLs stored in the tank is less than 0.75 psia (See Condition 7.2.6). Therefore, the petroleum liquids stored in the tanks do meet the definition for volatile petroleum liquid (See Condition 7.2.4(c))</li> <li>35 IAC 218.122(b): No odor nuisance exists and the tanks are used to store organic liquid with a maximum true vapor pressure of less than 17.24 kPa</li> <li>35 IAC Part 218, Subpart QQ or TT: Tanks are subject to 35 IAC 218, Subpart B</li> </ul>
<b>Periodic Monitoring (other than basic regulatory requirements)</b>	
Testing	None
Emissions Monitoring	None
Operational Monitoring	None

Inspections	None
Recordkeeping	Organic liquid throughput and vapor pressures and VOM emissions
Other	
<b>Reporting</b>	
Prompt Reporting	5 days: Storage of organic liquid with a true vapor pressure greater than 0.5 psia in Condition 7.2.6. 30 days: Exceedance of the emission and operational limits shown in Conditions 7.2.6.

Table 3 (Section 7.3 of the draft permit)

<b>Emission Unit</b>	
Name	Group 3 Storage Tanks External floating roof storage tanks that require a rim-mounted secondary seal
Description	External floating roof storage tanks that are required to have a rim mounted secondary seal to store various petroleum products
Date Constructed	(See Attachment 6)
Emission Control Equipment	(See Attachment 6)
<b>Applicable Rules and Requirements</b>	
Emission Standards	<ul style="list-style-type: none"> <li>• 35 IAC 218.121, 218.122(b), 218.123, and 218.124</li> </ul>
Title I Conditions	<ul style="list-style-type: none"> <li>• None</li> </ul>
Non-applicability	<ul style="list-style-type: none"> <li>• 40 CFR 60 Subparts K, Ka, or Kb: Tanks were constructed prior to the applicability dates of each NSPS</li> <li>• 35 IAC 218.120: Tanks are used solely for the storage of petroleum liquids (35 IAC 218.119(e))</li> <li>• 35 IAC Part 218, Subpart QQ or TT: Tanks are subject to 35 IAC 218, Subpart B</li> </ul>
<b>Periodic Monitoring (other than basic regulatory requirements)</b>	
Testing	None
Emissions Monitoring	None
Operational Monitoring	None
Inspections	<ul style="list-style-type: none"> <li>• 35 IAC 218.123(b)(4) and 218.124(a)(5): Semi-annual inspection</li> <li>• 35 IAC 218.124(a)(6): Measurement of the secondary seal gap</li> <li>• 35 IAC 218.123(b)(5): Cover and seals of each affected tank after the tank is emptied or during repairs</li> </ul>
Recordkeeping	<ul style="list-style-type: none"> <li>• 35 IAC 218.123(b)(6) and 218.124(a)(7): List of volatile petroleum liquid stored, maximum true vapor pressure of each liquid stored, results of inspections or measurements performed pursuant to Condition 7.3.8(a), (b) and/or (c).</li> <li>• 35 IAC 218.123(b)(6): Records to demonstrate compliance with Condition 7.3.8(c) (Cover and Seal Inspection)</li> </ul>

Other	<p>Flexibility:</p> <ul style="list-style-type: none"> <li>• Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.3 of this permit.</li> <li>• Changes accounted for in Condition 5.11.</li> </ul>
<b>Reporting</b>	
Prompt Reporting	<p>5 days: Storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.3.5, e.g., "no rim-mounted secondary seal,")</p> <p>30 days: Storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.3.5) due to damage, deterioration, or other condition of the tank</p>
Other Reporting	30 days: Planned performance of seal gap measurements - Section 39.5(7)(f) of the Act

Table 4 (Section 7.4 of the draft permit)

<b>Emission Unit</b>	
Name	Group 4 Storage Tanks Existing Floating Roof Storage Tanks
Description	Internal floating roof storage tanks to store various petroleum products
Date Constructed	(See Attachment 6)
Emission Control Equipment	(See Attachment 6)
<b>Applicable Rules and Requirements</b>	
Emission Standards	<ul style="list-style-type: none"> <li>35IAC 218.121, 218.122(b), 218.123, and 218.124</li> </ul>
Title I Conditions	<ul style="list-style-type: none"> <li>None</li> </ul>
Non-applicability	<ul style="list-style-type: none"> <li>40 CFR 60 Subparts K, Ka, or Kb: Tanks were constructed prior to the applicability dates of each NSPS</li> </ul> <p>Note the conversion Tanks T101 and T102 from a external floating roof tank to a internal floating roof tank through the addition of a geodesic dome does not constitute a modification since there is no increase in emissions of any criteria air pollutant, in accordance with 40 CFR 60.2 and 35 IAC 201.102.</p> <ul style="list-style-type: none"> <li>35 IAC 218.120: Tanks are used solely for the storage of petroleum liquids (See 35 IAC 218.119(e))</li> <li>35 IAC Part 218, Subpart QQ or TT: Tanks are subject to 35 IAC 218, Subpart B</li> </ul>
<b>Periodic Monitoring (other than basic regulatory requirements)</b>	
Testing	None
Emissions Monitoring	None
Operational Monitoring	None
Inspections	<ul style="list-style-type: none"> <li>35 IAC 218.123(b)(4): Semi-annual inspection</li> <li>35 IAC 218.123(b)(5): Cover and seals of each affected tank after the tank is emptied or during repairs</li> </ul>
Recordkeeping	<ul style="list-style-type: none"> <li>35 IAC 218.123(b)(6) and 218.124(a)(7): List of volatile petroleum liquid stored, maximum true vapor pressure of each liquid stored, results of inspections or measurements performed pursuant to Condition 7.3.8(a), (b) and/or (c).</li> <li>35 IAC 218.123(b)(6): Records to demonstrate compliance with Condition 7.4.8(b) (Cover and Seal Inspection)</li> </ul>

Other	<p>Flexibility:</p> <ul style="list-style-type: none"> <li>• Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.4 of this permit.</li> <li>• Changes accounted for in Condition 5.11.</li> </ul>
<b>Reporting</b>	
Prompt Reporting	<p>5 days: Storage of VPL in an affected tank that is not in compliance with the control requirements (due to absence of the features required by Condition 7.4.5, e.g., "no permanent submerged loading pipe,"</p> <p>30 days: Storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.4.5) due to damage, deterioration, or other condition of the tank.</p>

Table 5 (Section 7.5 of the draft permit)

<b>Emission Unit</b>	
Name	Group 5 Storage Tanks New internal floating roof storage tanks
Description	New internal floating roof storage tank(s) to store gasoline and ethanol
Date Constructed	(See Attachment 6)
Emission Control Equipment	(See Attachment 6)
<b>Applicable Rules and Requirements</b>	
Emission Standards	<ul style="list-style-type: none"> <li>• 40 CFR 60 Subpart Kb</li> <li>• 35 IAC 218.122(b)</li> </ul>
Title I Conditions	<ul style="list-style-type: none"> <li>• The draft permit contains limits on operation and emissions in Conditions 7.5.6. These limits were incorporated from previous CAAPP permits 95060051 and 95030014.</li> </ul>
Non-applicability	<ul style="list-style-type: none"> <li>• 35 IAC Part 218, Subpart QQ or TT: The affected tanks are subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]</li> <li>• 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources: The tanks do not use an add-on control device to achieve compliance with an emission limitation or standard.</li> </ul>
<b>Periodic Monitoring (other than basic regulatory requirements)</b>	
Testing	Vapor pressure of all VOLs stored: 40 CFR 60.116b(e)
Emissions Monitoring	None
Operational Monitoring	None
Inspections	40 CFR 60.113b(a): Seal inspections
Recordkeeping	<ul style="list-style-type: none"> <li>• 40 CFR 60.115b(a)(2): Inspections</li> <li>• 40 CFR 60.116b(b): Tank Dimensions</li> <li>• 40 CFR 60.116b(c): VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period</li> <li>• General Records: Affected storage tank emissions and throughput records</li> </ul>
Other	<p>Flexibility:</p> <ul style="list-style-type: none"> <li>• Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.5 of this permit.</li> <li>• Changes accounted for in Condition 5.11.</li> </ul>

**Reporting**

Prompt  
Reporting

5 days: storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.5.5  
30 days: storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.5.5) due to damage, deterioration, or other condition of the tank  
30 days: Exceedance of the emission and operational limits shown in Conditions 7.5.6.

Table 6 (Section 7.6 of the draft permit)

<b>Emission Unit</b>	
Name	Truck Loading Racks Control: Vapor Recovery Unit
Description	The East and West truck loading/unloading racks are used to load and unload various petroleum products.
Date Constructed	West Loading Rack - 1979 East Loading Rack - 1964
Emission Control Equipment	West Loading Rack Vapor Recovery Unit - 1979 East Loading Rack Vapor Recovery Unit - 1979
<b>Applicable Rules and Requirements</b>	
Emission Standards	<ul style="list-style-type: none"> <li>• 35 IAC 218.122(a): Loading Operation (Compliance assured through compliance with 35 IAC 218.582)</li> <li>• 218.582 Bulk Gasoline Terminals: Vapor control system (See Condition 7.6.6)</li> </ul>
Title I Conditions	<ul style="list-style-type: none"> <li>• See Condition 5.6.3(c)</li> </ul>
Non-applicability	<ul style="list-style-type: none"> <li>• 40 CFR 60 Subpart XX (Bulk Gasoline Terminals), because affected loading racks were constructed prior to December 17, 1980</li> </ul>
<b>Periodic Monitoring (other than basic regulatory requirements)</b>	
Testing	None
Emissions Monitoring	Compliance Assurance Monitoring (See Attachment 3 of the Permit)
Operational Monitoring	Continuous monitoring equipment: VOM concentration of each carbon adsorption bed exhaust or the exhaust of the bed next in sequence to be desorbed
Inspections	Vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks

Recordkeeping	<ul style="list-style-type: none"> <li>• Conditions 5.5 and 5.6 - Identification and properties of each organic liquid distributed through each affected loading rack, amount of each organic liquid distributed through each affected loading rack, in gallons per day, month and year and VOM emissions attributable to loading of petroleum products, tons/month and tons/year</li> <li>• Records of Operations - Loading of gasoline not in compliance with Condition 7.6.6 and 7.6.7</li> <li>• Inspection Requirements - Record of each leak inspection (Condition 7.6.8)</li> <li>• 40 CFR 60.116b(c) - VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period</li> <li>• Organic liquid throughput and vapor pressures and VOM emissions</li> <li>• CAM - Monitoring Data</li> </ul>
Other	
<b>Reporting</b>	
Prompt Reporting	<p>15 days: Operation of the affected loading rack and/or associated vapor recovery unit in excess of the limitations of Condition 7.6.6.</p> <p>Malfunction or Breakdown same or next day reporting of malfunctions</p>
Other Reporting	<p>Annual Report: monthly and annual throughputs and VOM emissions and Summary of any loading into trucks that did not meet the requirements of Conditions 7.6.6.</p> <p>Semi- Annual Report: VRU was not operating as per specifications or continuous monitoring equipment was not functioning</p> <p>Compliance Assurance Monitoring (CAM) as per Section 8.6.1</p> <p>Malfunction or Breakdown: Quarterly summary</p>

Table 7 (Section 7.7 of the draft permit)

<b>Emission Unit</b>	
Name	Fugitives from Leaking Components
Description	Fugitives from Leaking Components
Date Constructed	After 1964
Emission Control Equipment	None
<b>Applicable Rules and Requirements</b>	
Emission Standards	There are no general rules or regulations that address the operation of these emission units located at a petroleum bulk terminal. However, pursuant to 35 IAC 218.142, no person shall cause or allow the discharge of more than 32.8 ml (2 cu in) of VOL with vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) into the atmosphere from any pump or compressor in any 15 minute period at standard conditions. Note that pursuant to Condition 5.10, the source is shielded from determining compliance with 35 IAC 218.142.
Title I Conditions	None
Non-applicability	<ul style="list-style-type: none"> <li>• 35 IAC Part 218, Subpart TT, because the potential to emit VOM from affected emission units does not exceed 25 tpy.</li> </ul>
<b>Periodic Monitoring (other than basic regulatory requirements)</b>	
Testing	None
Emissions Monitoring	None
Operational Monitoring	The Permittee shall visually inspect for leaks from all affected equipment components on a monthly basis.
Inspections	None
Recordkeeping	Count of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or vapor service and VOM attributable to fugitive losses
Other	
<b>Reporting</b>	
Prompt Reporting	<p>5 days: Operation or failure to repair a leaking component (emission unit in excess of the limits specified in Condition 7.7.6.</p> <p>30 days: Operation of the affected emission units in excess of the limits specified in Conditions 7.7.8 (leak inspections) and 7.7.9 (component count, etc.)</p>

### ATTACHMENT 3: Prompt Reporting of Deviations

Prompt reporting of deviations is critical in order to have timely notice of deviations and the opportunity to respond, if necessary. The effectiveness of the permit depends upon, among other important elements, timely and accurate reporting. The Illinois EPA, USEPA and the public rely on timely and accurate reports submitted by the permittee to measure compliance and to direct investigation and follow-up activities. Prompt reporting is evidence of a permittee's good faith in disclosing deviations and describing the steps taken to return to compliance and prevent similar incidents.

Any occurrence that results in an excursion from any emission limitation, operating condition, or work practice standard as specified in this CAAPP permit is a deviation subject to prompt reporting. Additionally, any failure to comply with any permit term or condition is a deviation of that permit term or condition and must be reported to the Illinois EPA as a permit deviation. The deviation may or may not be a violation of an emission limitation or standard. A permit deviation can exist even though other indicators of compliance suggest that no emissions violation or exceedance has occurred. Reporting permit deviations does not necessarily result in enforcement action. The Illinois EPA has the discretion to take enforcement action for permit deviations that may or may not constitute an emission limitation or standard or the like, as necessary and appropriate.

Section 39.5(7)(f)(ii) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(B), requires prompt reporting of deviations from the permit requirements. The permitting authority (in this case, Illinois EPA) has the discretion to define "prompt" in relation to the degree and type of deviation likely to occur. Furthermore, Section 39.5(7)(f)(i) of the Illinois Environmental Protection Act, which mirrors 40 CFR 70.6(a)(3)(iii)(A) requires that monitoring reports must be submitted at least every 6 months. Therefore, USEPA generally considers anything less than 6 months to be "prompt" as long as the selected time frame is justified appropriately (60 Fed. Reg. 36083, 36086 (July 13, 1995)).

The USEPA has stated that, for purposes of administrative efficiency and clarity, it is acceptable to define prompt in each individual permit. *Id.* The Illinois EPA has elected to follow this approach and defines prompt reporting on a permit by permit basis. In instances where the underlying applicable requirement contains "prompt" reporting, this frequency or a shorter frequency of reporting is the required timeframe used in this permit. Where the underlying applicable requirement fails to explicitly set forth the timeframe for reporting deviations, the Illinois EPA has developed a structured manner to determine the reporting approach used in this permit.

The Illinois EPA generally uses a time frame of 30 days to define prompt reporting of most deviations. Also, for certain permit conditions in individual permits, the Illinois EPA may require an alternate timeframe that is less than 30 days if the permit requirement justifies a shorter reporting time period. Under certain circumstances, EPA may establish a deviation reporting period longer than 30 days, but, in no event exceeding 6 months. Where it has established a deviation reporting period other than 30 days in an individual permit (specifically Section 7.x.10), the Illinois EPA has explained the reason for the alternative timeframe. (See Attachment 2 of this Project Summary.)

The timing for certain deviation reporting may be different when a source or emission unit at a source warrants reporting to address operation, independent of the occurrence of any deviations. This is the case for a source that is required to perform continuous monitoring for the emission unit, for which quarterly or semi-annual "monitoring" reports are appropriate. Where appropriate, reporting of deviations has generally been combined in, or coordinated with these quarterly or semi-annual reports, so that the overall performance of the plant can be reviewed in a comprehensive fashion. This will allow a more effective and efficient review of the overall performance of the source by the Illinois EPA and other interested parties, as well as by the source itself.

At the same time, there are certain deviations for which quicker reporting is appropriate. These are deviations for which individual attention or concern may be warranted by the Illinois EPA, USEPA, and other interested parties. Under this scenario, emphasis has been placed primarily on deviations that could represent substantial violations of applicable emission standards or lapses in control measures at the source. For these purposes, depending on the deviation, immediate notification may be required and preceded by a follow-up report submitted within 15 days, during which time the source may further assess the deviation and prepare its detailed plan of corrective action.

In determining the timeframe for prompt reporting, the Illinois EPA assesses a variety of criteria such as:

- historical ability to remain in continued compliance,
- level of public interest in a specific pollutant and/or source,
- seriousness of the deviation and potential to cause harm,
- importance of applicable requirement to achieving environmental goals,
- designation of the area (i.e., non-attainment or attainment),
- consistency among industry type and category,
- frequency of required continuous monitoring reports (i.e., quarterly),
- type of monitoring (inspection, emissions, operational, etc.), and
- air pollution control device type and operation

These prompt reporting decisions reflect the Illinois EPA's consideration of the possible nature of deviations by different emission units and the responses that might be required or taken for those different types of deviations. As a consequence, the conditions for different emission units may identify types of deviations which include but are not limited to: 1) Immediate (or very quick) notification; 2) Notification within 30 days as the standard; or 3) Notification with regular quarterly or semi-annual monitoring reports.

The Illinois EPA's decision to use the above stated prompt reporting approach for deviations as it pertains to establishing a shorter timeframe in certain circumstances reflects the criteria discussed as well as USEPA guidance on the topic.

- 40 CFR 71.6(a)(3)(iii)(B) specifies that certain potentially serious deviations must be reported within 24 or 48 hours, but provides for semi-annual reporting of other deviations. (Serious or severe consequences)

- FR Vol. 60, No. 134, July 13, 1995, pg. 36086 states that prompt should generally be defined as requiring reporting within two to ten days of the deviation, but longer time periods may be acceptable for a source with a low level of excess emissions. (intermediate consequences)
- Policy Statement typically referred to as the "Audit Policy" published by the USEPA defines prompt disclosure to be within 21 days of discovery. (Standard for most "pollutant limiting" related conditions)
- Responses to various States by USEPA regarding other States' definition of prompt.

As a result, the Illinois EPA's approach to prompt reporting for deviations as discussed herein is consistent with the requirements of 39.5(7)(f)(ii) of the Act as well as 40 CFR part 70 and the CAA. This reporting arrangement is designed so that the source will appropriately notify the Illinois EPA of those events that might warrant individual attention. The timing for these event-specific notifications is necessary and appropriate as it gives the source enough time to conduct a thorough investigation into the causes of an event, collecting any necessary data, and to develop preventative measures, to reduce the likelihood of similar events, all of which must be addressed in the notification for the deviation.

ATTACHMENT 4: Changes made to the DRAFT CAAPP Permit

The following changes were made to the draft CAAPP permit based upon comments from the source, as per correspondence dated October 10, 2007 - from George C. Naydol.

Table of Contents	Corrected Typo in 7.1 section heading to show that the affected tanks store "store various organic liquids including ethanol with a true vapor pressure of less than 15.0 kPa (2.1 psia)" and not "17.24 kPa (2.5 psia)".
Section 3.1.1	Removed the following from the list of insignificant activities:  One 6,000 gallon oil/water separator (Lubes) having VOM emissions of less than 1.0 lb/hr and individual HAP emissions of less than 0.1 lb/hr
Section 5.6.3(a) & (b)	Removed the following Conditions:  a. The total HAP emissions from the affected loading racks and associated vapor recovery units (See Section 7.6) shall not exceed 35 milligrams per liter of material loaded, pursuant to Sections 9.1(d) and 39 of the Act, so that the operation of this loading rack and vapor collection/recovery unit is not a major source for HAP subject to 40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).  This condition supersedes 35 IAC 218.582(a)(1) which requires that each affected loading rack be equipped and operated with a vapor control system that limits emissions of VOM to not more than 80 milligrams per liter (0.00067 lb/gal) of gasoline loaded from tank trucks during product loading.  b. The MTBE concentration of reformulated and conventional gasoline at the source shall not exceed an annual average concentration of 11.9%. Based upon the analysis provided in the application, MTBE is the primary HAP of concern in gasoline.

Section 5.6.3(a)	<p>And Added</p> <p>a. The total HAP emissions from the affected source shall not exceed 80% of the major source threshold for individual or total HAPs (i.e., emissions greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), pursuant to Sections 9.1(d) and 39 of the Act, this is to ensure that the source is not a major source for HAP subject to 40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).</p>
Section 7.1	Corrected Typo in 7.1 section heading to show that the affected tanks store "store various organic liquids including ethanol with a true vapor pressure of less than 15.0 kPa (2.1 psia)" and not "17.24 kPa (2.5 psia)".
Section 7.1.1	Corrected Typo in description to show that the affected tanks store "store various organic liquids including ethanol with a true vapor pressure of less than 15.0 kPa (2.1 psia)" and not "17.24 kPa (2.5 psia)".
Section 7.4.2	Corrected typo in the "List of Emission Units and Air Pollution Control Equipment", i.e., the footnote reference for Tank T202 was deleted since Tank T202 <u>was not</u> converted from an external floating roof tank to an internal floating roof tank through the addition of a geodesic dome
Section 7.6.12(c)	<p>Revised to clarify and correct errors in the emission calculation procedure. This includes the addition of broader explanation of the procedure; a breakdown of the procedure into uncontrolled and controlled components; the addition of conversion factors;...etc.</p> <p>Note that the underling emission calculation procedure and emission factors were retained.</p>