

217/782-2113

CONSTRUCTION PERMIT/PSD APPROVAL

PERMITTEE

Natural Gas Pipeline Company of America
Attn: Lisa Young
370 Van Gordon Street
P.O. Box 281304
Lakewood, Colorado 80228-8304

Application No.: 05110051 I.D. No.: 073816AAA
Applicant's Designation: St 110-LECTech Date Received: November 21, 2005
Subject: 2006 Low-Emission Control Technology Installation
Date Issued: "Draft permit"
Location: Station 110, 16648 Illinois Highway 82 South, Geneseo, Henry County

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of installation of Low Emission Control Technology, with accompanying catalytic oxidation systems, on five existing, natural gas-fired compressor engines, at its Geneseo Compressor Station, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

In conjunction with this permit, approval is given with respect to the Prevention of Significant Deterioration of Air Quality Regulations (PSD) to construct and operate the above referenced project, in that the Illinois Environmental Protection Agency (Agency) finds that the application fulfills all applicable requirements of 40 CFR 52.21. This approval is issued pursuant to the Clean Air Act, as amended, 42 U.S.C. 7401 *et. seq.*, the Federal regulations promulgated there under at 40 CFR 52.21 for Prevention of Significant Deterioration of Air Quality (PSD), and a Delegation of Authority agreement between the United States Environmental Protection Agency and the Illinois EPA for the administration of the PSD Program. This approval becomes effective in accordance with the provisions of 40 CFR 124.15 and may be appealed in accordance with the provisions of 40 CFR 124.19. This approval is also based upon and subject to the following findings and the conditions that follow.

Findings

- 1.1a. Natural Gas Pipeline Company of America (NGP) has requested a permit to install Low Emission Control Technology on five existing natural gas fired compressor engines, Engines 9, 12, 13, 14 and 15, at its Geneseo Compressor Station. NGP is proposing to add LEC technology to the engines to meet future control requirements for emissions of nitrogen oxides (NOx). In 2003, NGP undertook a similar project involving LEC Technology on another engine at the station, Engine 10, pursuant to Construction Permit 01030079.
- b. The use of LEC Technology on the engines will be accompanied by increases in emissions of carbon monoxide (CO) and volatile organic

material (VOM). As part of this project, NGP will also be adding oxidation catalyst systems to the engines. In its application for this project, NGP shows that these oxidation catalyst systems will prevent a significant increase in CO emissions accompanying this project. However, NGP's analysis for the project shows that the increase in potential annual VOM emissions will still be significant.

2. NGP's Geneseo Station is located in Henry County, an area that is currently designated attainment for all ambient air quality standards.
- ~~3.~~3a. The proposed project is not subject to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, for emissions of NO_x because NO_x emissions will be lowered as a result of the project.
- b. NGP's analysis of the proposed project on emissions of VOM predicts an annual emissions increase of 110 tons. Accordingly, the project qualifies as a major modification for VOM emissions under the PSD rules
- c. NGP's analysis of the proposed project shows that the potential annual increases in emissions of other PSD pollutants, i.e., CO, sulfur dioxide (SO₂), and particulate matter (PM) will be less than 100, 40 and 15 tons, respectively, as described in Attachment 1. Accordingly, this project is not a major modification for emissions of PSD pollutants other than VOM.
4. After reviewing all the materials submitted by NGP, the Illinois EPA has determined that the project, as proposed, would (i) be in compliance with applicable Illinois Pollution Control Board emission standards and (ii) utilize Best Available Control Technology (BACT) for emissions of VOM, as specified in Condition 1.4.
5. The air quality analysis submitted by NGP and reviewed by the Illinois EPA shows that the increase in VOM emissions from the proposed project will not cause a violation of the ozone ambient air quality standard. In addition, both VOM and NO_x are precursors to the formation of ozone in the atmosphere. The increase in VOM emissions from the project is more than counterbalanced by the decrease in NO_x emissions from the project, projected at about 380 tons/year.
6. The Illinois EPA has determined that the project, as proposed, would comply with applicable Illinois Air Pollution Control Regulations and the federal rules for Prevention of Significant Deterioration of Air Quality (PSD), 40 CFR 52.21.
7. A copy of the application and the Illinois EPA's formal review of the application and a draft of this permit were placed in a location in the vicinity of the project, and the public was given notice and an opportunity to examine this material and to submit comments and to request a public hearing on this matter.
8. The Illinois EPA is issuing this approval subject to the following conditions and consistent with the specifications and data included in the application. Any departure from the conditions of this approval or terms expressed in the application would need to receive prior written authorization by Illinois EPA.

Unit Specific Conditions for Five Natural Gas-Fired Engines

1.1 Description

The Geneseo Compressor Station is part of the interstate pipeline system that transports natural gas from production areas to utilities and other customers. Natural gas fired engines are used at the Station to power compressors, which raise the pressure of the natural gas in the pipeline and move the natural gas through the pipeline.

The Permittee is altering five engines at its Geneseo Station by installing Low Emission Control (LEC) Technology to reduce NOx emissions from these engines. This LEC technology reduces the formation of NOx by altering the way in which fuel is introduced into the cylinders, by increasing the operating pressure in the fuel injection system. The objective of the project is to reduce the NOx emissions from the engines by about 40 percent, by achieving NOx emission rates of no more than 3.0 grams per brake horsepower for one engine and no more than 5.0 grams per brake horsepower for the other four engines.

A side effect of LEC technology is to increase the emissions of CO and VOM from the engines. CO and VOM are normally emitted from the engines, as trace products of incomplete combustion that are present in much lower concentrations than NOx. The Permittee will address the increases in CO and VOM that accompany the use of LEC technology by adding oxidation catalyst systems to the exhaust systems from the altered engines and using good engine practice for effective combustion.

1.2 List of Emission Units and Pollution Control Equipment

Engine	Description	Emission Control Equipment
9	Clark Model TCV-10	LEC Technology and Oxidation Catalyst
12	Worthington Model MLV-10	PreCombustion Chamber, LEC Technology, and Oxidation Catalyst System
13	Worthington Model MLV-10	PreCombustion Chamber, LEC Technology, and Oxidation Catalyst System
14	Worthington Model MLV-10	PreCombustion Chamber, LEC Technology, and Oxidation Catalyst System
15	Worthington Model MLV-10	PreCombustion Chamber, LEC Technology, and Oxidation Catalyst System

1.3 Applicability Provisions and Applicable Regulations

- a. An "affected engine" for the purpose of this permit is an engine described in Conditions 1.1 and 1.2 after installation of LEC technology.
- b. Each affected engine is subject to 212.123(a), which provides that the emissions of smoke or other particulate matter from each engine shall not have an opacity greater than 30 percent, except as allowed by 35 IAC 201.149, 212.123(b), or 212.124.

1.4 Control Technology Determination

- a. i. Each affected engine shall be equipped, operated and maintained with LEC Technology for control of NOx emissions.
- ii. Each affected engine shall be equipped, operated and maintained with an oxidation catalyst system and operated in accordance good practice to minimize the increases in emissions of VOM that accompany effective use of LEC Technology.
- b. Emissions of VOM from each affected engine shall not exceed 0.80 gram/brake horsepower-hour, when operating in the normal load range.

The above requirements represent the application of the Best Available Control Technology (BACT) for emission of VOM as required by Section 165 of the Clean Air Act.

1.5 Non-Applicability Provisions

- a. i. This permit is issued based on this project not being a major modification subject to the PSD rules for emissions of CO, PM, and SO₂ because it will not be accompanied by significant increases in emissions, as defined under the PSD rules.
- ii. The Permittee shall, for a period of 10 years following resumption of regular operation after the changes entailed in this project are made, operate the affected engines in such a manner that this project does not result in a significant increase in emissions of CO, PM or SO₂ and qualify as a major modification for any of these pollutants.
- iii. The Permittee shall also fulfill the applicable recordkeeping and reporting requirements of the PSD rules, 40 CFR 52.21(r) (6), for this project.
- b. This permit is issued based on the source not being a major source of emissions of hazardous air pollutants, so that this permit need not address 40 CFR 63 Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants (HAPs) for Reciprocating Internal Combustion Engines.

1.6-1 Operational and Production Limits and Work Practices

- a. The affected engines shall only be fired with natural gas.
- b. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate each affected engine in a manner consistent with good air pollution control practice for minimizing emissions.

- c. The Permittee shall carry out detailed operational evaluations and inspections of the affected engines on a routine basis. These actions shall be taken on at least an annual basis for an engine that is in routine service and on at least an equivalent interval frequency in terms of actual engine operating hours for an affected engine that is not in routine service.

1.6-2 Emission Limitations

- a. The annual VOM emissions of the affected engines shall not exceed the following limits. Compliance with these limits shall be determined from a running total of 12 months of data. For affected Engines 12, 13, 14 and 15, these limitations supersede the limitation on VOM emissions from these engines established in Construction Permit/PSD Approval 85100014.

Engine	Limitation Tons/Year
9	32.83
12	30.90
13	30.90
14	30.90
15	30.90
Total	156.4

- b. The limitation on CO and NOx emissions established for the affected Worthington engines in Construction Permit/PSD Approval 85100014 shall continue in effect, as follows:
- i. The emissions from each affected Worthington engine shall not exceed 5.0 and 9.0 grams per brake horsepower-hour for CO and NOx, respectively.
 - ii. The emissions from each affected Worthington engine shall not exceed 44.1 and 79.4 pounds per hour for CO and NOx, respectively.

1.6-3 Anticipated Changes to Permitted Emissions for Purposes of Fees

The Permittee shall apply for a revision to its CAAPP permit as specified by Condition 2.0(b)(i), to address the increases in emissions that accompany this project. It is expected that the operation of the source following this project will be accompanied by levels of VOM, SO₂ and PM emissions that are above the limits currently set by Condition 5.5.1 of the source's CAAPP permit for purposes of fees, as generally described below, as the current CAAPP permit does not address operation of the affected engines with LEC technology.

Expected Increases in Levels of Permitted Emissions

Pollutant	Limit (Tons/Year)	
	Current	Future
Volatile Organic Material (VOM)	102.8	220.0
Sulfur Dioxide (SO ₂)	0.90	2.0
Particulate Matter (PM)	18.8	25.0

1.7-1 Emission Testing Requirements

- a. Within 180 days after operating an affected engine at the greatest load at which it will normally be operated but not later than 300 days after its initial startup, the Permittee shall have emissions tests performed by an approved testing service as follows.
- i. Emissions of NO_x and CO shall be measured during three levels of load on an engine, i.e., at high load, intermediate load and low load, as readily achievable during the period of testing.
 - ii. Emissions of VOM and selected organic HAPs shall be measured at two levels of load on an engine, i.e., at high load and at either intermediate or low load during the period of testing, unless testing at a single load is approved by the Illinois EPA as part of the review of the test plan.
 - iii. Emissions of PM shall be measured at the low load of the engine during the period of testing, unless testing at high or intermediate load is approved by the Illinois EPA as part of the review of the test plan.
 - iv. Observations of opacity shall be made for at least 12 minutes (two 6-minute averages) during each of the test runs for the above emission measurements.
- c. USEPA methods and procedures shall be used for testing, including the following methods, unless other USEPA supported methods are approved by the Illinois EPA as part of the its review of the test plan.
- | | |
|----------------------------------|--------------------------|
| Carbon Monoxide | USEPA Method 10 |
| Nitrogen Oxides | USEPA Method 20 |
| Particulate Matter | USEPA Methods 5 and 202 |
| Volatile Organic Material | USEPA Methods 18 and 25A |
| Organic Hazardous Air Pollutants | USEPA Method 18 |
| Opacity | USEPA Method 9 |
- d. At least 60 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review. This plan shall describe the specific procedures for testing and shall include, at a minimum:
- i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - ii. The specific conditions under which testing shall be performed including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the engine will be tracked and recorded.

- iii. The specific determinations of emissions that are intended to be made, including sampling and monitoring locations and expected operating load of the engines during testing. As part of this plan, the Permittee may set forth a proposal for approval by the Agency for performing representative emission testing on the engines, provided, however, that all engines are fitted for testing and a complete set of testing is performed for the Clark engine and one Worthington engine. The Permittee may also propose testing for VOM, organic HAP, and PM emissions under alternative load scenarios, as generally provided for above, based upon a showing that the proposed testing will provide representative data for the maximum emissions of the pollutant from the engine.
 - iv. The specific organic HAPs for which testing is proposed to be performed, with an explanation why measurements of the selected HAPs should be sufficient to confirm the magnitude of emissions of any individual HAP and of total HAPs from the affected engines.
 - v. The test method(s), which will be used, with the specific analysis method, if the method can be used with different analysis methods.
- e. The Illinois EPA shall be notified prior to these tests to enable it to observe these tests. Notification 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. 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.
- f. Three copies of the Final Reports for these tests shall be forwarded to the Illinois EPA, within 60 days after the completion of testing. The Final Report from testing shall contain a minimum:
- i. A summary of results.
 - ii. General information.
 - iii. Description of test method(s), including a description of sampling points, sampling train, analysis equipment, and test schedule.
 - iv. Detailed description of engine operating conditions during testing, including, including fuel consumption (standard ft³ of natural gas) or firing rate (million Btu/hr), calculated load (brake horsepower), and key operating parameters of the LEC technology.

- v. Data and calculations, including copies of all raw data sheets and records of laboratory analysis, sample calculations, and data on equipment calibration.

1.7-2 Opacity Observation Requirements

- a. The Permittee shall have the opacity of the emissions from the affected engines during representative weather and operating conditions determined by a qualified observer in accordance with USEPA Test Method 9, as further specified below.
 - i. Following the initial emission measurements, periodic observations of opacity shall be conducted at least every year for each affected engine if visible emissions, as determined by USEPA Method 22, are normally present when the engine is operating.
 - ii. Upon written request by the Illinois EPA, observations of the opacity of the affected engines shall be conducted within 60 calendar days of the request or on the date agreed upon by the Illinois EPA, whichever is later.
- b. The duration of opacity observations 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 less than 10.0 percent.
- c.
 - 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(s) and employer(s) of the qualified observer(s).
 - ii. The Permittee shall promptly notify the Illinois EPA of any changes in the time or date for testing.
- d. 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.
- e. 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.
 - iii. Copy of current certification.
 - iv. Description of observation condition, including recent weather.
 - v. Description of the operating conditions of the affected engine.

- vi. Raw data.
- vii. Opacity determinations.
- viii. Conclusions.

1.8 Monitoring and Instrumentation Requirements

- a. The Permittee shall install, operate, calibrate and maintain permanent instrumentation on each affected engine to measure natural gas injection pressure and any other critical operating parameters of the LEC Technology.
- b. The instrumentation required by this permit shall be operated and maintained in accordance with good practice for effective operational monitoring.
- c. In addition to retaining the records of measured operating parameter(s), the Permittee shall maintain the following records for required instrumentation:
 - i. A file for each instrument that contains: 1) The manufacturer's specifications for the unit; and 2) The written instructions provided by manufacturer for operation, calibration, maintenance and repair of the unit.
 - ii. A log other records for the instruments, which at a minimum identifies any outage of the instrument, with explanation, and calibration, maintenance and repair activities performed on the system, with date and description.

1.9 Recordkeeping Requirements

- a. The Permittee shall maintain records for each affected engine for fuel usage or operating hours, on a monthly and annual basis.
- b. The Permittee shall maintain an operating log or other records for each affected engine, that at a minimum, identifies when each affected engine operated and operating data for the engine, as measured pursuant to Condition 1.8, recorded on a regular schedule.
- c. The Permittee shall maintain records of the following for each incident when an affected engine operated without the customary control measures:
 - i. The date of the incident and identification of the affected engine that was involved.
 - ii. A description of the incident, including the customary control measures that were not present or implemented; the customary control measures that were present, if any; and the magnitude of the NOx, CO, VOM and PM emissions during the incident.
 - iii. The time at and means by which the incident was identified,

- e.g., scheduled inspection or observation by operating personnel.
- iv. The length of time after the incident was identified that the affected engine continued to operate before customary control measures were in place or the engine was shutdown (to resume operation only after customary control measures were in place) and, if this time was more than one hour, an explanation why this time was not shorter, including a description of any mitigation measures that were implemented during the incident.
 - v. The estimated total duration of the incident, i.e., the total length of time that the affected engine ran without customary control measures.
 - vi. A discussion of the probable cause of the incident and any preventative measures taken.
 - vii. A discussion whether an applicable limitation in Condition 1.4 or 1.6-2 may have been violated during the incident, with an estimate of the amount of any additional or excess emissions (pounds) from the incident, with supporting explanation.
- d.
 - i. The Permittee shall keep a file, which shall be kept current, that contains the emission factors used to calculate emissions from the different affected engines with supporting documentation.
 - ii. The Permittee shall maintain records of the emissions of NO_x, CO, VOM, PM and SO₂ of each affected engine (tons/month and tons/year), with supporting calculations.
 - e. The Permittee shall maintain an inspection and maintenance log or other records for each affected engine and associated emission control measures that, at a minimum, document performance of the inspections required by Condition 1.6-3 and other activities performed to maintain proper operation as related to control of emissions.
 - f. The Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9 for the affected engines 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 Condition 1.7(b), or otherwise the identity of the observer, a description of the measurements that were made, the operating condition of the affected engine, the observed opacity, and copies of the raw data sheets for the measurements.

1.10 Reporting Requirements

- a. During the shakedown period for the affected engines, the Permittee shall submit quarterly progress reports summarizing the

status of each affected engine, describing activities that have been completed, and discussing the expected timetable for completion of shakedown and emission testing. The first such report shall be submitted within 30 days of the initial startup of an affected engine with LEC technology and subsequent reports shall be submitted in no more than 3 month intervals until all affected engines are fully operational with LEC technology.

- b. i. The Permittee shall promptly notify the Illinois EPA of a deviation from a requirement of this permit in accordance with the general requirements for such notifications in the CAAPP permit for the source.
- ii. Until the CAAPP permit for the source is revised to address the changes to the affected engines with this project, the following timing shall apply to deviation notifications.
 - A. Deviations from applicable emission standards or short-term emission limitations that last more than two-hours shall be immediately reported to the Illinois EPA.
 - B. Deviations from limitations and other requirements related to annual emissions shall be reported within 30 days.
 - C. Deviations from other requirements shall be reported in a quarterly report.
- c. Two copies of submittals and notification required by this permit shall be made to the Illinois EPA in accordance with the general provisions in the CAAPP permit for the source that address submittal of such material to the Illinois EPA.

1.11 Commencement Of Construction

As provided by 40 CFR 52.21(r)(2), this permit shall become invalid if installation of LEC technology on the affected engines is not commenced within 18 months of the permit becoming effective, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable period of time. The Illinois EPA may extend the 18-month period upon a satisfactory showing that an extension is justified. This condition supersedes Standard Condition 1. (See Attachment 2.)

1.12 Authorization for Operation of the Affected Engines

- a. Under this permit, each affected engine may be operated for a period of up to one year (365 days) from initial startup with LEC technology to allow for equipment shakedown and emission testing as required. This period may be extended by the Illinois EPA upon request of the Permittee if additional time is needed to complete shakedown or perform emission testing.
- b. i. Upon successful completion of emission testing demonstrating compliance with applicable short-term

limitations, the Permittee may continue to operate the affected engines, provided, however, that as provided by Section 39.5(5) of the Environmental Protection Act a complete application for revision of the CAAPP permit for the source is submitted to the Illinois EPA within 12 months of initial startup with LEC technology, to address the changes to the engines.

- ii. As part of this application, the Permittee shall include detailed information on the potential emissions of CO from each affected engine in the absence of the catalytic oxidation system to determine whether these systems must be operated under a Compliance Assurance Monitoring Plan.
- c. Upon complete submission of a CAAPP application within 12 months of initial startup, the Permittee may operate the engines under this construction permit until the CAAPP permit is issued.

1.13 Effect Of This Permit

This permit does not relieve the Permittee of the responsibility to comply with all local, state and federal regulations that are part of the applicable Illinois' State Implementation Plan, as well as all other applicable federal, state and local requirements.

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

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

DES:CPR:psj

cc: Region 2

ATTACHMENT 1: EVALUATION OF THE CHANGE IN EMISSIONS WITH THIS PROJECT

Table 1: Past Actual Emissions of the Affected Engines
Based on average of data from 1999 and 2000

Engine	Past Actual Annual Emissions (Tons)				
	NOx	CO	PM	VOM	SO ₂
9	400.37	74.16	1.23	14.69	0.07
12	198.74	46.88	1.04	7.19	0.06
13	195.84	46.20	1.03	7.09	0.06
14	262.56	61.94	1.38	9.50	0.08
15	220.59	52.04	1.16	7.98	0.07
Total	1278.1	281.2	5.84	46.45	0.34

Table 2: Future Projected and Permitted Emissions of the Affected Engines

Engine	Future Annual Emissions (Tons)				
	NOx	CO	PM	VOM	SO ₂
9	123.12	30.78	1.88	32.83	0.13
12	193.12	67.98	2.15	30.90	0.22
13	193.12	67.98	2.15	30.90	0.22
14	193.12	67.98	2.15	30.90	0.22
15	193.12	67.98	2.15	30.90	0.22
Total	895.6	302.7	10.48	156.4	1.00

Table 3: Change in Emissions

Time Period	Annual Emissions (Tons)				
	NOx	CO	PM	VOM	SO ₂
Future	895.6	281.2	10.48	156.4	0.34
Past	1278.1	302.7	5.84	46.4	1.01
Change	-382.5	21.5	4.64	110.0	0.67
PSD Sign.	40	100	15	40	40

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.