

217/782-2113

"REVISED"
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE

The Premcor Refining Group Inc.
Attn: Thomas Mroz
3600 West 131st Street
Alsip, Illinois 60803

<u>Application No.:</u> 96030063	<u>I.D. No.:</u> 031824AAB
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 6, 1996
<u>Operation of:</u> Bulk Petroleum Storage and Distribution Terminal	
<u>Date Issued:</u> August 19, 2003	<u>Expiration Date</u> ¹ : August 19, 2008
<u>Source Location:</u> 3600 West 131st Street, Alsip, Cook County	
<u>Responsible Official:</u> Paul Brochu, Vice President of Logistics Operations and Development	

This permit is hereby granted to the above-designated Permittee to OPERATE bulk petroleum storage and distribution terminal, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: June 28, 2004
Revision Date Issued: To Be Determined
Purpose of Revision: Minor Modification

This minor modification updates Section 7.1 to allow the use of an automated system to assure loading with vapor-tight tank trucks and to correlate the reporting requirements with Condition 8.6.1. In addition, the responsible official is changed from Ed Jacoby to Paul Brochu.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supercedes those terms and conditions of the permit for which the conflict exists. The previous permit issued August 19, 2003 is incorporated herein by reference. Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

If you have any questions concerning this permit, please contact Jonathan Sperry at 217/782-2113.

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

DES:DGP:jar

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

¹ Except as provided in Conditions 1.5 and 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

The Premcor Refining Group, Inc
3600 West 131st Street
Alsip, Illinois 60803
708/385-5000 Ext. 257

I.D. No.: 031824AAB
Standard Industrial Classification: 5171, Petroleum Product
Storage and Transfer

1.2 Owner/Parent Company

The Premcor Refining Group, Inc
8182 Maryland Avenue
Clayton, Missouri 63105-3721

1.3 Operator

The Premcor Refining Group, Inc
3600 West 131st Street
Alsip, Illinois 60803

Thomas Mroz, Environmental, Health, and Safety Engineer
708/385-5000 Ext. 257

1.4 General Source Description

The Premcor Refining Group, Inc is located at 3600 West 131st Street in Alsip. The source stores and distributes petroleum products. Emissions of VOM result from loading of petroleum products into tank trucks and barges, and also from storage tanks. There is also a wastewater treatment plant on site.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

- a. This permit contains Title I conditions that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
LAER	Lowest Achievable Emission Rate
lb	pound
MACT	Maximum Achievable Control Technology
mg	Milligram
Mg	Megagram
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO ₂	Sulfur Dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TOC	Total Organic Carbon
USEPA	United States Environmental Protection Agency
VOL	Volatile Organic Liquid

VOM	Volatile Organic Material
VPL	Volatile Petroleum Liquid
VRU	Vapor Recovery Unit

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

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

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

Wastewater Storage Tank with Internal Floating Roof
(Tank #58)
Fugitive Equipment Losses

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Pressure Tanks

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

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

3.2 Compliance with Applicable Requirements

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

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit/Tank No.	Description	Date Constructed ^a	Emission Control Equipment
Loading/Unloading Rack	Loading Rack Used for Loading Various Petroleum Products Into Tank Trucks	1981	Vapor Recovery Unit (Carbon Adsorber)
Propane Loading Rack	Loading of Pressurized Tank Trucks	Pre-1972	None
Barge Loading	Loading of Barges with Distillate Fuel Oil or Asphalt	Prior to 1973	None
External Floating Roof Storage Tanks			
54	External Floating Roof Tank Storing Gas Oil, a Petroleum Product, Nominal Capacity 2,520,000 Gallons	Pre-1972	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
56	External Floating Roof Tank Storing Gasoline, a Petroleum Product, Nominal Capacity 3,020,000 Gallons	Pre-1972	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
801, 802, 803, 806, 807, 808	External Floating Roof Tanks Storing Gasoline, a Petroleum Product, Nominal Capacity 3,770,000 Gallons Each	Pre-1972	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
Internal Floating Roof Storage Tanks			
Group 1, Subject to NSPS, Subpart Kb			
67	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 162,000 Gallons	1999	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
74	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 473,000 Gallons	1990	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
323	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 95,000 Gallons	1986	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading

Emission Unit/Tank No.	Description	Date Constructed ^a	Emission Control Equipment
Group 2, Subject to NSPS, Subpart Ka			
91, 92, 93	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 945,000 Gallons, Each	1980	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
Group 3, Not Subject to NSPS			
40, 41, 42	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 1,701,000 Gallons	Pre-1972	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
44	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 945,000 Gallons	Pre-1972	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
65	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 160,000 Gallons	Pre-1972	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
83	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 630,000 Gallons	Pre-1972	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
97	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 135,000 Gallons	Pre-1972	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
804	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 3,764,000 Gallons	Pre-1972	Floating Roof, Mechanical Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
Fixed Roof Storage Tanks			
Group 1 - Fixed Roof Tanks Vented to Vapor Control Sphere			
47	Fixed Roof Tank Containing Petroleum Products, Nominal Capacity 2,117,000 Gallons	Pre-1972	Vapor Control Sphere, VCS #1

Emission Unit/Tank No.	Description	Date Constructed ^a	Emission Control Equipment
73, 75, 76	Fixed Roof Tanks Containing Petroleum Products, Nominal Capacity 472,500 Gallons Each	Pre-1972	Vapor Control Sphere, VCS #1
Group 2 - Fixed Roof Tanks Over 40,000 Gallons Capacity			
52	Fixed Roof Tank Containing Petroleum Products, Nominal Capacity 2,538,000 Gallons	Pre-1972	None
77, 78	Fixed Roof Tanks Containing Petroleum Products, Nominal Capacity 472,500 Gallons Each	Pre-1972	None
Group 3 - Fixed Roof Tanks Under 40,000 Gallons Capacity			
5 90 95 96	Fixed Roof Tanks, Nominal Capacity in Gallons: No.5 - 29,000; No. 90 - 20,000; Nos. 95 and 96 - 16,000 Each	2000 1980 Pre-1972 Pre-1972	None
Wastewater Treatment Plant	API Separators (Floating Oil and Solids Gravity Separation Process) and Dissolved Air Flotation Units (Oil/Solids Separation by way of Chemical Coagulation and Air Flootation)	1998	Thermal Oxidizer

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

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

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

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

5.2.3 Ozone Depleting Substances

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

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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

5.2.4 Risk Management Plan

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

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 Future Regulations

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.2.8 Pursuant to 35 IAC 218.585(a), (b), and (c), during the regulatory control periods of May 1 to September 15 of each year, no person shall sell, offer for sale, dispense, supply, offer for supply, or transport for use in Illinois gasoline, that has a Reid vapor pressure in excess of the following:

- a. Gasoline shall not exceed 9.0 psi (62.07 kPa); and
- b. Ethanol blend gasoline shall not exceed the limitations of (a) above by more than 1.0 psi (6.9 kPa). Notwithstanding this limitation, blenders of ethanol are prohibited from adding butane or any product that will increase the Reid vapor pressure of the blended gasoline.

5.3 Non-Applicability of Regulations of Concern

This permit is issued based on the gasoline terminal not being subject to 40 CFR 63 Subpart R, the NESHAP for bulk gasoline terminals because the source is not major for HAPs. The terminal was previously subject to 40 CFR 63 Subpart CC (Petroleum Refinery NESHAP), which in turn referenced Subpart R, but when refinery shutdown the source is no longer major for HAPs. The USEPA (Region 5) confirmed this interpretation in an applicability determination dated August 28, 2000 (Control Number M000013).

5.4 Source-Wide Operational and Production Limits and Work Practices

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

- a. The Permittee shall inspect pumps and compressors for leaks on at least a quarterly basis. If a significant leak is detected by any means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs within 15 days.
- b. During the regulatory control period, May 1 through September 15 of each year, the Permittee shall supply to any truck loaded a statement that the Reid vapor pressure of all gasoline or ethanol blends leaving the source for use in Illinois complies with the Reid vapor limitations of Condition 5.2.8. Any operation receiving this gasoline shall be provided with documentation stating that the Reid vapor pressure of the gasoline complies with the Reid vapor pressure requirements of 35 IAC 218.585(b) and (c) (Condition 5.2.3).

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

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

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	241.95
Sulfur Dioxide (SO ₂)	0.04
Particulate Matter (PM)	8.62
Nitrogen Oxides (NO _x)	8.11
HAP, not included in VOM or PM	-----
Total	258.72

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data (as described in Section 5.7.3), with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) do not apply to the source.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

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

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

5.6.2 Records for Operating Scenarios

- a. The Permittee shall maintain a log identifying which unit-specific condition (Condition 7.2, 7.3, or 7.4 of this permit) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.
- b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m³ (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.
 - i. The date* on which construction of the tank was commenced, with a copy of supporting documentation;
 - ii. The date(s)* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, were commenced on the tank, if applicable;
 - iii. A list of the types of VOL actually stored in the tank and anticipated to be stored in the tank, with date of each change in the list; and
 - iv. The dimensions of the tank and an analysis of capacity. [35 IAC 218.129(f) and 40 CFR 60.116b(b)]

* If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

5.6.3 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM and HAP emissions from the storage tanks at the source so as to demonstrate compliance with the annual emission limits in Condition 5.5. These records shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

- a. The color of each storage tank;

- b. The condition of each storage tank; and
- c. The type and number of fittings, or a statement that the default settings regarding type and number of fittings in the TANKS program are used for emission estimation.

5.6.4 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to allow verification that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63 Subpart R and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5:

- a. The Permittee shall maintain the following general records:
 - i. The identification and properties of each organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;
 - ii. The vapor weight percent of each HAP in the organic material emissions for each liquid determined as the average over the annual range of storage temperature and representative data on the composition of the liquid, with identification of supporting documentation, e.g., USEPA 1992 survey;
 - iii. A copy of the supporting documentation for HAP vapor weight percent; and
 - iv. A current analysis of the tank or tanks in each group that would have the greatest emissions from storage of various liquids to the extent that the Permittee does not choose to keep throughput records by individual tank, to identify the tank that should be assumed for emission calculations.
- b. The Permittee shall maintain records of the following items on a monthly basis for the previous month:
 - i. The throughputs of each organic liquid through each tank or group of tanks if based on 5.6.4(a) (iv);
 - ii. The organic material (OM) emissions attributable to each organic liquid stored at the source, tons/month, with supporting calculations, calculated utilizing an approved USEPA methodology, such as the TANKS program;

- iii. For each HAP identified as present, the total emissions of the individual HAP for all emission units at the source, tons/month, with supporting calculations; and
- iv. Total emissions of each individual HAP, and combined HAPs from the source, tons/month, with supporting calculations.

5.6.5 Records for Operating Scenarios

If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F as provided for in Condition 5.8, the Permittee shall maintain a log identifying the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.

5.6.6 Records for Pump and Compressor Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4.

- a. The performance of an inspection or other observation identifying a leaking component, including, date, the individual that performed the inspection, and the type of inspection;
- b. The condition, i.e., idle or operation, of each pump or compressor inspected;
- c. The presence of a leak, with description and the means of identification;
- d. The date the leak was repaired, or the component taken out of service; and
- e. If a corrective action, as in Condition 5.4, was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

5.6.7 Records for Gasoline Volatility

Pursuant to 35 IAC 218.585(h) (2), the Permittee shall maintain records of the following items for gasoline and ethanol blends leaving the source for use in Illinois:

- a. Reid vapor pressure of each gasoline or ethanol blend shipment;
- b. Quantity of each gasoline or ethanol blend shipment; and

c. Date of delivery of each shipment.

5.6.8 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

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

Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

5.7.2 Annual Emissions Report

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

5.7.3 Annual Reporting of HAP

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total

of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and

- b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

- a. The Permittee is authorized to store 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 naphtha, 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. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of an emission unit, as defined in 35 IAC 201.102.
- b. Upon resuming storage of VPL with a vapor pressure greater than 0.5 psia in such a tank, the applicable unit-specific conditions of Section 7.0 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct applicable inspection of the tank for storage of VPL.

5.9 General Compliance Procedures

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

5.10 Special Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 218.142 as Condition 5.4 establishes appropriate compliance procedures for this rule that do not rely on such measurements.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

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

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

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

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

6.2 Applicability

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

6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transactions

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emissions Excursion Compensation

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

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

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

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

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

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 1,321 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 133.3986 tons.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.

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

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

b. Contingent Allotments for New or Modified Emission Units

Not applicable.

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

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

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

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

6.9 Recordkeeping for ERMS

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

- a. Seasonal component of the Annual Emissions Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

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

Boilers 16H2, 16H3, 16H4, 16H5; Crude Units 6H2, 6H3, 6H4, 6H5, 17H1R; Platformers 13H1A-C, 13H2, 20H1, 20H2, 20H3, 20H4, 20H5; Unifiners 10H1A, 10H1B, 14H1, 14H2, 9H1A, 9H1B; Isomaxs 12H1, 12H2, 12H3, 12H4; Alky 8H1; Hot Oil Heater 8H2H; Preheater 7H1

Note: These units are no longer operating but were part of the original ERMS baseline which included the refinery.

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

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

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Loading Operations
Control: Vapor Recovery Unit

7.1.1 Description

The truck loading/unloading rack is used to load and unload various petroleum products and additives. The Permittee operates a loading rack that consists of six arms for loading gasoline, two arms for loading No. 2 distillate fuel oil, and three arms for loading ethanol. An area for loading liquefied propane gas into pressurized tank trucks is physically separated from the bottom loading rack. The VOM emissions from the truck loading/unloading rack occur when material is loaded into delivery vehicles using bottom loading. A vapor recovery unit is used to capture and control the emissions that occur as a result of displacement of vapors in the delivery vehicles. The VOM emissions from unloading material are accounted for in the working losses of the storage tanks the material is loaded into, with the exception of fugitive emissions that are attributed to the components, i.e., valves, flanges, etc. associated with the truck loading stations.

There is no displacement of vapors when loading propane so the control unit is not used. It is a pressurized system.

There is also a barge loading operation where only asphalt and distillate fuel oil (which have relatively low vapor pressures) are loaded so the control unit is not used.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Loading/Unloading Rack	Loading Rack Used for Bottom Loading Various Petroleum Products Into Tank Trucks	Vapor Recovery Unit (Carbon Adsorber)
Propane Loading Rack	Loading of Pressurized Tank Trucks	None
Barge Loading	Loading of Barges with Distillate Fuel Oil or Asphalt	None

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected loading rack," for the purpose of these unit-specific conditions, is a loading rack that is subject to the requirements of 40 CFR 60 Subpart XX and 35 IAC 218.582 and relies on a vapor

collection/recovery unit for compliance. For purposes of 40 CFR 60 Subpart XX, a "gasoline tank truck" is a delivery tank truck used at bulk gasoline terminals which is loading gasoline or has loaded gasoline on the immediately previous load. Each loading rack used to transfer gasoline into a delivery vessel (gasoline tank truck) from any bulk gasoline terminal is subject to the requirements of 35 IAC 218.582. Loading racks constructed or modified after December 17, 1980 are subject to the requirements of 40 CFR 60 Subpart XX.

- b. The petroleum products truck loading operation (excluding propane) are subject to 35 IAC 215.122 (a) which states that no person shall cause or allow the discharge of more than 8 lb/hr of organic material from the aggregate loading pipes of any gal/day into any railroad tank car, tank truck or trailer unless such loading area is equipped with submerged loading pipes. Exception: If no odor nuisance exists this limitation shall only apply to the loading of VOL with a vapor pressure of 2.5 psia or greater at 70°F. Note that bottom loading is considered equivalent to a submerged loading pipe.

7.1.4 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the propane loading operation not being subject to 35 IAC 218.122(b), which requires a submerged loading pipe when loading a volatile organic liquid (VOL) with a vapor pressure greater than 2.5 psia, because the rule is only relevant to loading operations which displace vapors, and pressure tanks do not displace vapors.
- b. This permit is issued based on the barge loading operation not being subject to 35 IAC 218 Subpart GG, Marine Terminals, because the rule only applies to sources that load or are permitted to load gasoline or crude oil and the Permittee does not load either of these materials. [35 IAC 218.760(a)] See also Condition 7.1.5(b).

7.1.5 Control Requirements and Operational Limitations

- a. Each affected loading rack shall be equipped and operated with a vapor collection system designed to collect the total organic compounds (TOC) vapors displaced from tank trucks during product loading that limits the emissions to the atmosphere to not more than 35 milligrams of TOC per liter of gasoline loaded pursuant to 40 CFR 60.502(a) and (b) and 80 mg pursuant to 35 IAC 218.582(a)(1) and (2).

- b. The only materials that may be loaded into barges are asphalt and distillate fuel oil or other materials with comparable vapor pressures, i.e., less than 0.1 psia.

7.1.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide limitations in Condition 5.5 that include this unit.

7.1.7 Operating Requirements

- a. Vapor collection systems used to control TOC emissions from affected loading racks shall be designed and operated to prevent any TOC vapors collected at one affected loading rack from passing to another affected loading rack. [40 CFR 60.502(d)]
- b. The Permittee shall act to assure that loading of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]
- c. The Permittee shall act to assure that each affected loading rack and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. [40 CFR 60.502(g)]
- d. There shall be no liquid drainage from the loading device of an affected loading rack when it is not in use. [35 IAC 218.582(a) (3)]
- e. An affected loading rack and associated vapor collection system shall be designed and operated to prevent gauge pressure in the gasoline tank truck from exceeding 4,500 pascals (450 mm of water) during product loading. [40 CFR 60.502(h)]
- f. The Permittee shall provide a pressure tap or equivalent on the vapor collection system associated with an affected loading rack. The vapor collection system and the gasoline loading equipment shall be operated in such a manner that it prevents avoidable leaks of liquid during loading or unloading operations and prevents the gauge pressure from exceeding 18 inches of water and the vacuum from exceeding 6 inches of water and to be measured as close as possible to the vapor hose connection. [35 IAC 218.582(b) (2), 218.582(b) (1) (A) and (C)]
- g. No pressure-vacuum vent in an affected loading rack's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [40 CFR 60.502(i)]

- h. All loading and vapor return lines shall be equipped with fittings, which are vapor tight. [35 IAC 218.582(a) (4)]
- i. All loading of liquid product into gasoline tank trucks at an affected loading rack shall be limited to vapor-tight tanks using the following procedures in accordance with 40 CFR 60.502(e). The Permittee shall utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (for example, via a card lock-out system).
 - i. The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) (see also Condition 7.1.9(d) (i)) for each gasoline tank truck. [40 CFR 60.502(e) (1)]
 - ii. The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded. [40 CFR 60.502(e) (2)]
 - iii. The Permittee shall cross-check each tank identification number obtained above with the file of tank vapor tightness documentation within two weeks after the tank is loaded. Alternatively this cross-check may be performed quarterly or semiannually as allowed by 40 CFR 60.502(e) (3) (i) (A) and (B). [40 CFR 60.502(e) (3)]
 - iv. The Permittee shall notify the owner or operator of each non-vapor-tight gasoline tank truck loaded at the terminal within one week after the documentation cross-check required above. [40 CFR 60.502(e) (4)]
 - v. The Permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the terminal until vapor tightness documentation for that tank truck is obtained. [40 CFR 60.502(e) (5)]
- j. No person shall cause or allow the transfer of gasoline into a delivery vessel from an affected loading rack unless the delivery vessel displays the appropriate sticker pursuant to 35 IAC 218.584(b) or (d) or the delivery vessel has provided a current certification as required by 35 IAC 218.584(c) (3), and the delivery vessel meets the following requirements [35 IAC 218.582(a) (5) and 218.584(a)]:

- i. Includes a vapor space connection that is equipped with fitting which is vapor tight;
- ii. Has its hatches closed at all times during loading or unloading operations, unless a top loading vapor recovery system is used;
- iii. Does not internally exceed a gauge pressure of 18 inches of water or a vacuum of 6 inches of water;
- iv. Is designed and maintained to be vapor tight at all times during normal operations;
- v. Is not refilled in Illinois at other than:
 - A. Bulk gasoline terminals that comply with the requirements of 35 IAC 218.582; or
 - B. Bulk gasoline plants that comply with the requirements of 35 IAC 218.581(b).
- vi. Are tested annually in accordance with Method 27, 40 CFR 60, Appendix A. Each vessel must be repaired and retested within 15 business days after discovery of the leak by the owner, operator, or the Illinois EPA, when it fails to sustain:
 - A. A pressure drop of no more than three inches of water in five minutes; and
 - B. A vacuum-drop of no more than three inches of water in five minutes.

7.1.8 Inspection and Monitoring Requirements

- a. Each calendar month, the vapor collection/recovery system and each affected loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. The detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [40 CFR 60.502(j)]
- b. The vapor recovery unit shall be equipped with a CEMS to measure the hydrocarbon concentration at the exhaust of the VRU. [35 IAC 218.105(d)(2)(A)(iii)]

7.1.9 Recordkeeping Requirements

a. General Recordkeeping

The Permittee shall maintain records of the following for each affected loading rack to demonstrate compliance with Conditions 5.5.1, 7.1.5(c), and 7.1.6(a) and (b):

- i. The identification and properties of each organic liquid distributed through each affected loading rack, as related to emissions, i.e., vapor pressure and molecular weight;
- ii. The amount of each organic liquid distributed through each affected loading rack, gallons per month and gallons per year, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months;
- iii. The number of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service, as applicable;
- iv. Emissions of VOM attributable to loading of petroleum products, tons/month and tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology, such as Section 5.2 of the AP-42 and the control efficiency of a VRU as demonstrated in the most recent test, with annual records updated each month by totaling the throughput for that month plus the preceding 11 months (See Condition 7.1.12(c) for gasoline loading); and
- v. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.), tons/month and tons/year, with supporting calculations, calculated utilizing an approved USEPA methodology.

b. Records of Operations

The Permittee shall maintain records of the following for loading rack and associated vapor recovery unit to demonstrate compliance with Conditions 7.1.5 and 7.1.7:

- i. The use of an affected loading rack for loading of any gasoline tank truck when the VRU was not operating at the appropriate operating variables (e.g., vacuum during regeneration), including:

- A. The date and time of the loading;
 - B. The specific problem with the VRU or hydrocarbon monitor;
 - C. Type of material loaded; and
 - D. The reason that loading occurred even though the VRU was not operating at the appropriate variables.
- ii. The use of an affected loading rack for the loading of any non-vapor-tight gasoline tank (one not meeting the requirements of Condition 7.1.7(i)) or a delivery vessel that does not display the appropriate sticker or has not provided a current certification (one not meeting the requirements of Condition 7.1.7(j)), including:
- A. The date and time of the loading;
 - B. The specific reason the vessel did not meet the requirements of Condition 7.1.7(i) or (j);
 - C. Type of material loaded; and
 - D. The reason why loading was allowed.
- c. Inspection Requirements

The Permittee shall keep the following records for each affected loading rack and associated vapor collection/recovery system, which delivers liquid product into gasoline tank trucks:

A record of each monthly leak inspection required under 40 CFR 60.502(j) (Condition 7.1.8) shall be kept on file at the terminal. Inspection records shall include, as a minimum, the following information:

- i. Date of inspection;
- ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak);
- iii. Leak determination method;
- iv. Corrective action, including the date each leak was repaired and the reasons

for any repair interval in excess of 15 days; and

- v. Name and signature of the person that performed the inspection.

d. Gasoline Tank Truck Records

The Permittee shall keep the following records for the gasoline tank trucks loaded at this terminal in accordance with 40 CFR 60.505:

- i. The Permittee shall update the tank truck vapor tightness documentation in the automated system and terminal files for each gasoline tank truck loaded at the terminal at least once per year to reflect current test results as determined by Method 27. This documentation shall include as a minimum, the following information:
 - A. Test Title: Gasoline Delivery Tank Pressure Test - EPA Reference Method 27;
 - B. Owner name and address;
 - C. Tank identification number;
 - D. Testing location;
 - E. Date of test;
 - F. Tester name and signature;
 - G. Witnessing inspector, if any: name, signature, and affiliation; and
 - H. Test results: Actual pressure change in 5 minutes, mm of water (average 2 runs).
- ii. The Permittee shall retain current vapor tightness documentation in the terminal automation system for each gasoline tank truck loaded at the terminal, including the tank truck ID, vapor tightness certification number, and certification expiration date.
- iii. The Permittee shall retain a paper copy of the vapor tightness documentation at the terminal. The copy must be an exact duplicate image of the original paper record with certifying signatures.
- iv. A copy of the tank truck vapor tightness documentation must be made available for

inspection by Illinois EPA or USEPA representatives during the source of a site visit, or within a mutually agreeable time frame.

7.1.10 Reporting Requirements

a. Annual Report

The Permittee shall provide an annual report, to be submitted with the source's annual emission report, which includes the following:

Summarization of any use of an affected loading rack to load delivery vessels (gasoline tank trucks) into trucks that did not meet the requirements of Conditions 7.1.7(i) or (j), including:

- i. The date and time of the loading;
- ii. The specific reason the vessel did not meet the requirements of Condition 7.1.7(i) or (j);
- iii. Type of material loaded; and
- iv. The reason why loading was allowed.

b. Semi-Annual Reports

Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit a semi-annual report for any monitoring that is required. These reports shall be submitted according to the schedule in Condition 8.6.1 and shall include the following information for the preceding 6 month period:

- i. Summary of any use of an affected loading rack when the CEMS hydrocarbon monitor indicated that emissions were exceeding the allowable of Condition 7.1.3(a) or 7.1.5(a) at the appropriate temperature, including:
 - A. Date and time of occurrence;
 - B. Specific problem associated with the VRU or flame monitor;
 - C. Type of material being loaded; and
 - D. Reason why loading continued.
- ii. Summary of times when the continuous hydrocarbon monitor and/or strip chart

recorder of disk storage was not functioning, including:

- A. Date and time of occurrence; and
- B. Specific problem associated with the indicator or recording equipment.

c. Reporting of Non-compliance

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limits as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

Notification within 15 days of operation of loading rack and/or associated vapor recovery unit in excess of the limitations of Condition 7.1.5(a).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected loading rack without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.1.12 Compliance Procedures

- a. Compliance with the operational limitations of Condition 7.1.5(a), shall be demonstrated through the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.1.8, 7.1.9, and 7.1.10 and the compliance procedures in 7.1.12(d) and (e).
- b. Compliance with the control requirements of 7.1.5(a) shall be demonstrated by the inspection/monitoring, recordkeeping and reporting requirements of Conditions 7.1.8, 7.1.9, and 7.1.10 and the fact that compliance of loading rack and associated vapor recovery unit have previously been demonstrated by fulfillment of the test requirements of 40 CFR 60.8 by measurement of the total organic concentration(s) in the effluent stream of the vapor recovery system pursuant to 40 CFR 60.503.
- c. VOM emission from the bottom loading of gasoline shall be calculated by use of the following equation:

$$\text{Total VOM Emissions (lb)} = \text{Throughput (gallon)} \\ \times 2.37 \times 8.345 \times 10^{-6}$$

Where:

Throughput = Loading Rack Throughput as determined by the records required in 7.1.9(a)

2.37 = The controlled VRU emission rate as demonstrated through stack testing (mg/liter of gasoline loaded); and

8.345×10^{-6} = Conversion factor lb-liter/gal-mg

7.2 Unit: External Floating Roof Storage Tanks
 Control: Floating Roof and Double Seals

7.2.1 Description

The terminal has a number of storage tanks. This section is a list of tanks that store petroleum products and are equipped with external floating roofs.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
54	External Floating Roof Tank Storing Gas Oil, a Petroleum Product, Nominal Capacity 2,520,000 Gallons	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
56	External Floating Roof Tank Storing Gasoline, a Petroleum Product, Nominal Capacity 3,020,000 Gallons	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
801	External Floating Roof Tank Storing Gasoline, a Petroleum Product, Nominal Capacity 3,770,000 Gallons	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
802	External Floating Roof Tank Storing Gasoline, a Petroleum Product, Nominal Capacity 3,770,000 Gallons	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
803	External Floating Roof Tank Storing Gasoline, a Petroleum Product, Nominal Capacity 3,770,000 Gallons	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
806	External Floating Roof Tank Storing Gasoline, a Petroleum Product, Nominal Capacity 3,770,000 Gallons	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
807	External Floating Roof Tank Storing Gasoline, a Petroleum Product, Nominal Capacity 3,770,000 Gallons	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
808	External Floating Roof Tank Storing Gasoline, a Petroleum Product, Nominal Capacity 3,770,000 Gallons	Floating Roof, Metallic Shoe Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading

7.2.3 Applicability Provisions

- a. An "affected tank," for the purposes of these unit-specific conditions, is a storage tank that is only subject to the requirements of 35 IAC 218.121, 218.122(b), 218.123, and 218.124. Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, storing volatile petroleum liquid (VPL), equipped with an external floating roof is subject to the requirements of 35 IAC 218.124(a) unless it is exempted pursuant to 35 IAC 218.124(b). A tank also may be exempt due to the current service, features, or other circumstances associated with the tank. A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3°K (70°F).

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.2.2. The status of all storage tanks at this source, including affected tanks that are subject to 35 IAC 218.124(a), is summarized in Attachment 1.

- b. When storing a volatile organic liquid (VOL, e.g. ethanol), each tank is subject to 35 IAC 218.120(a)(3) which requires double seals. Compliance with Condition 7.2.5, 7.2.7 and 7.2.8 shall be deemed compliance with this requirement.

7.2.4 Non-Applicable Regulations

Each affected storage tank is not subject to the requirements of 40 CFR 60 Subpart K, Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.

7.2.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. A floating roof which rests on the surface of the VOL that is equipped with a primary seal [35 IAC 218.121(b)(1)];
- b. A floating roof that is equipped with a continuous seal extending from the floating roof to the tank wall (rim mounted secondary seal) [35 IAC 218.124(a)(1)] (The Illinois EPA has not approved use of other equivalent equipment in lieu of a rim-mounted secondary seal.);
- c. All drains (for drainage of rainwater, also know as "stub drains") in the floating roof deck shall be provided with slotted membrane fabric covers or equivalent covers across at least 90 percent of the area of the opening [35 IAC 218.124(a)(3)];
- d. All openings of the floating roof deck, other than drains, shall be equipped with projections into the

tank which remain below the liquid surface at all times except when supported on the roof legs and be equipped with covers, lids or seals [35 IAC 218.124(a)(4)]; and

- e. A permanent submerged loading pipe. [35 IAC 218.122(b)]

7.2.6 Emission Limitations

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

N/A

7.2.7 Operating Requirements

- a. Each affected tank shall be operated so that the floating roof including the seal closure devices meet the following requirements:
 - i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)];
 - ii. The seal is intact and uniformly in place around the circumference of the floating roof between the floating roof and tank wall [35 IAC 218.124(a)(2)(A)];
 - iii. The accumulated area of gaps exceeding 0.32 centimeter (1/8 inch) in width between the secondary seal and the tank wall shall not exceed 21.2 square centimeters per meter of tank diameter (1.0 square inch per foot of tank diameter) [35 IAC 218.124(a)(2)(B)]; and
 - iv. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:
 - A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 218.123(b)(3)(A)];
 - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 218.123(b)(3)(B)]; and

- C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting [35 IAC 218.123(b) (3) (C)].
- b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations [35 IAC 218.121 (b) (1)].

7.2.8 Inspection Requirements

- a. The Permittee shall inspect each affected tank prior to May 1 of each year, to insure compliance with the applicable control and operating requirements [35 IAC 218.124(a) (5)].
- b.
 - i. The Permittee shall measure the secondary seal gap of each affected tank prior to May 1 of each year. This measurement shall be conducted in accordance with the methods and procedures specified in 40 CFR 60, Subpart Kb [35 IAC 218.124(a) (6)].
 - ii. Prior notification for the above measurements shall be given to the Illinois EPA as specified in Condition 7.2.10(b).
- c. The Permittee shall perform a complete inspection of the cover and seals of each affected tank whenever the tank is emptied and degassed for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made that require degassing of the tank as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b) (5)].

7.2.9 Recordkeeping Requirements

- a. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank, pursuant to 35 IAC 218.123(b) (6) and 218.124(a) (7):
 - i. A list of the types of volatile petroleum liquid stored on a monthly basis;
 - ii. The maximum true vapor pressure of each type of liquid as stored, psia;

- iii. The results of any inspections or measurements required by the Condition 7.2.8(a), (b) and/or (c), including:
 - A. Type of inspection;
 - B. When the inspection and/or measurement was performed;
 - C. Who performed the inspection and/or measurement;
 - D. The method of inspection and/or measurement;
 - E. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
 - F. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with Condition 7.2.8(c) (Cover and Seal Inspection) [35 IAC 218.123(b) (6)]:

Records that are sufficient to identify whenever the tank is emptied and degassed for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.

7.2.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA, Compliance Section and Regional Field Office, at least 30 days before the planned performance of seal gap measurements, pursuant to Section 39.5(7) (f) of the Act, so the Illinois EPA may observe the measurements.
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations with the control, operating, or inspection requirements, as follows pursuant to Section 39.5(7) (f) (ii) of the Act:
 - i. Any 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 7.2.5, e.g., "no rim-mounted secondary seal,") within 5 days of

becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

- ii. Any storage of VPL in an affected tank that is out of compliance with the control requirements (Condition 7.2.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.
- b. Changes accounted for in Condition 5.8.
- c. The primary seals may be replaced with the same or a different type. Secondary seals may be replaced but must be rim-mounted.

7.2.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use of the TANKS program, AP-42 upon which the Tanks Program is based, or any other method that utilizes USEPA approved emission factors for storage tank emissions. For the ERMS seasonal report, the calculations must be consistent with the ERMS baseline determination.
- b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt percent (based on a 1992 USEPA survey or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions

contributed by that product is acceptable. Other means of estimating HAP emissions utilizing USEPA accepted methodologies is also acceptable.

7.3 Unit: Internal Floating Roof Storage Tanks
 Control: Floating Roof and Seals

7.3.1 Description

The Permittee operates a number of internal floating roof storage tanks to store various petroleum products or ethanol. Permanent submerged loading is an inherent part of this design since there is no vapor space.

The Permittee has limited four tanks to storage of a petroleum product (e.g., jet naphtha) with a vapor pressure not to exceed 1.6 psia at 70°F in order to limit the source to non-major status.

These tanks involve several possible regulations but all comply with the most stringent but similar requirements. The requirements for some are NSPS, which can be 40 CFR 60 Subparts Ka or Kb. Petroleum storage tanks are subject to NSPS are not subject to 35 IAC 218.123(b).

Wastewater or remediation water may also be stored in these tanks.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Group 1 ^a , Subject to NSPS, Subpart Kb		
67	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 162,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading
74	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 473,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading
323	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 95,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading
Group 2 ^a , Subject to NSPS, Subpart Ka		
91, 92, 93	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 945,000 Gallons, Each	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading

Emission Unit	Description	Emission Control Equipment
Group 3, Not Subject to NSPS		
40	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 1,701,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading
41, 42	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 1,701,000 Gallons	Floating Roof, Vapor-Mounted Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
44	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 945,000 Gallons	Floating Roof, Vapor-Mounted Primary Seal and Rim-Mounted Secondary Seal, Submerged Loading
46	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 2,113,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading
65	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 160,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading
83	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 630,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading
97	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 135,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading
804	Internal Floating Roof Tank, Storing Petroleum Products or Ethanol, Nominal Capacity, 3,764,000 Gallons	Floating Roof, Liquid-Mounted Primary Seal, Submerged Loading

^a The Group 1 and Group 2 designations listed here are not related to Group 1 and Group 2 designations used in various NESHAP regulations.

7.3.3 Applicability Provisions and Applicable Regulations

a. The Group 1 tanks listed in Condition 7.3.2, for the purposes of these unit specific conditions are storage tanks that are subject to the control

requirement of 40 CFR 60 Subpart Kb and 35 IAC 218.122(b) that relies on an internal floating roof and a permanent submerged loading pipe for compliance, respectively. A storage tank constructed, reconstructed, or modified after July 23, 1984 is subject to the control requirements of 40 CFR 60 Subpart Kb if it has a capacity greater than or equal to 40 m³ (10567 gallons).

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.3.2. The status of all storage tanks at this source, including affected tanks that are subject to 40 CFR 60 Subpart Kb, is summarized in Attachment 1.

Note that when these tanks are storing ethanol they do not qualify for the exemption stated in 40 CFR 60.110b(b) (7) because that exemption only applies to beverage alcohol and these tanks do not store beverage alcohol.

- b. Each storage tank subject to 40 CFR 60 Subpart Kb (i.e., Group 1) is hereby shielded from compliance with 35 IAC 218.120, 218.121, and 218.123. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR 60, Subpart Kb assures compliance with 35 IAC 218.120, 218.121, and 218.123, following the review requirements of 40 CFR 60 Subpart Kb and 35 IAC 218.120, 218.121, and 218.123.
- c. The Group 2 tanks listed in Condition 7.3.2, for the purposes of these unit specific conditions, are storage tanks that are subject to the control requirement of 40 CFR 60 Subpart Ka and 35 IAC 218.122(b) that relies on an internal floating roof and a permanent submerged loading pipe for compliance, respectively. A storage tank constructed, reconstructed, or modified after May 19, 1978 and prior to July 23, 1984 is subject to the control requirements of 40 CFR 60 Subpart Ka if it has a capacity greater than or equal to 151,416 liters (40000 gallons).

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.3.2. The status of all storage tanks at this source, including affected tanks that are subject to 40 CFR 60 Subpart Ka, is summarized in Attachment 1.

Tanks that are subject to 40 CFR 60 Subpart Ka are not shielded from compliance with 35 IAC 218.120, 218.121 and 218.123.

- d. An "affected tank," for the purposes of these unit-specific conditions, is a storage tank that is subject to the requirements of 35 IAC 218.121, 218.122(b), and 218.123. Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more, storing volatile petroleum liquid (VPL), is subject to the requirements of 35 IAC 218.123(b) unless it is specifically excluded pursuant to 35 IAC 218.123(a). Group 1 and 2 tanks are exempt from some of the requirements based on applicability of a NSPS [35 IAC 218.122(a)(5)]. A tank also may be exempt due to the current service, features, or other circumstances associated with the tank (See Condition 5.8). A tank must comply with other rules if the vapor pressure of the VPL is 86.19 kPa (12.5 psia) or greater at 294.3°K (70°F).

When in VOL service (e.g., storing ethanol), an "affected tank," for the purposes of these unit-specific conditions, is a storage tank subject to the requirements of 35 IAC 218.120(a) and 218.122(b) that relies upon a permanent submerged loading pipe and internal floating roof for compliance. An affected storage tank is subject to the control requirements of 35 IAC 218.120(a) if it has a capacity greater than or equal to 40,000 gallons storing a VOL with a vapor pressure of 0.75 psia or more but less than or equal to a maximum true vapor pressure of 11.1 psia. [35 IAC 218.120(a)(1)]

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.3.2. The status of all storage tanks at this source, including affected tanks is summarized in Attachment 1.

- e. Each affected tank is subject to the emission limits identified in Condition 5.2.2.

7.3.4 Non-Applicability of Regulations of Concern

- a. The affected tank(s), except when in ethanol service, are not subject to the requirements of 35 IAC 218.120 pursuant to 35 IAC 218.119(e) because the tanks are used solely for the storage of petroleum liquids.
- b. Each affected Group 3 storage tank is not subject to the requirements of 40 CFR 60 Subpart K, Ka or Kb because the tanks were constructed prior to the date that the NSPS became applicable.

- c. Groups 1 and 2 tanks are not subject to 35 IAC 218.123 when in VPL service because they are subject to a NSPS [35 IAC 218.123(a)(5)]. Though these tanks are subject to 35 IAC 218.121, compliance with Subpart Ka or Kb is deemed to be more stringent and will demonstrate compliance with 35 IAC 218.121.
- d. The affected tanks are not subject to 35 IAC 218.124 because the tanks are considered internal floating roof tanks.
- e. This permit is issued based on the affected storage tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected storage tanks uses a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.3.5 Control Requirements and Work Practices

- a. Each affected Group 1 tank shall comply with the requirements of 40 CFR 60.112b(a)(1)(i), which requires the use of a fixed roof in combination with an internal floating roof that is equipped with one of the following closure devices:
 - i. A foam-filled or liquid-filled liquid-mounted seal; or
 - ii. Two continuous seals; or
 - iii. A mechanical shoe seal
- b. Each affected tank shall also be equipped with a permanent submerged loading pipe. [35 IAC 218.122(b)]
- c. Group 2 tanks when storing a VPL with a vapor pressure of 1.5 psia or greater and Group 3 tanks when storing a VOL with a vapor pressure of 1.5 psia or greater storage tanks shall be equipped with a floating roof which rests on the surface of the VOL that is equipped with a primary seal [35 IAC 218.121(b)(1) and 40 CFR 60.112a(a)(2)];
- d. For Group 3 storage tanks all openings of the floating roof deck, other than drains, shall be equipped with covers, lids or seals [35 IAC 218.123(b)(3)]; and
- e. All storage tanks shall have a permanent submerged loading pipe. [35 IAC 218.122(b)]

- f. When any tank is in ethanol (VOL) service the following control requirements apply:
- i. An internal floating roof which shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [35 IAC 218.120(a)(1)(A)]
 - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof [35 IAC 218.120(a)(1)(B)]:
 - A. A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank;
 - B. Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous; or
 - C. A mechanical shoe seal, which is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
 - iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents

is to provide a projection below the liquid surface. [35 IAC 218.120(a) (1) (C)]

- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use [35 IAC 218.120(a) (1) (D)]
- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [35 IAC 218.120(a) (1) (E)]
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [35 IAC 218.120(a) (1) (F)]
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [35 IAC 218.120(a) (1) (G)]
- viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [35 IAC 218.120(a) (1) (H)]

7.3.6 Emission Limitations

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

Emissions from the affected Tank No. 83 shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.3	2.8

These limits are based on the use of an approved USEPA emission calculation methodology, such as the TANKS Program.

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) [T1].

The above limitations were established in Permit 99090044, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

7.3.7 Operating Requirements

- a. Each affected Group 1 tank when storing a VOL with a vapor pressure of 1.5 psia or greater shall be operated in compliance with the operating requirements of 40 CFR 60.112b(a) (1) and 60.113b(a), as follows:
 - i. The internal floating roof shall float on the liquid surface at all times, except during those intervals when the storage tank is being completely emptied and subsequently refilled and the roof rests on its leg supports. When the roof is resting on its leg supports, the process of emptying or refilling shall be continuous and shall be accomplished as rapidly as possible [40 CFR 60.112b(a) (1) (i)]
 - ii. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface. [40 CFR 60.112b(a) (1) (iii)]
 - iii. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover or lid which is maintained in a closed position at all times (i.e., no visible gaps) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a) (1) (iv)]

- iv. Automatic bleeder vents shall be equipped with a gasket and be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a) (1) (v)]
 - v. Rim space vents shall be equipped with a gasket and be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a) (1) (vi)]
 - vi. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a) (1) (vii)]
 - vii. Each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a) (1) (viii)]
 - viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a) (1) (ix)]
 - ix. A tank that is in-service shall be repaired or emptied upon identification in an inspection that the floating roof is not resting on the surface of the VOL, there is liquid accumulated on the roof, the seal is detached, or there are holes or tears in the seal fabric. These actions shall be completed within 45 days of the inspection unless an extension is granted. [40 CFR 60.113b(a) (2) and (a) (3) (ii)]
 - x. A tank that is empty shall be repaired prior to refilling the tank upon identification in an inspection that the floating roof has defects, the primary seal has holes, tears or other openings in the seal or seal fabric, or the secondary seal has holes, tears or other openings in the seal or seal fabric, or the gaskets no longer close off. [40 CFR 60.113b(a) (3) (ii) and (a) (4)]
- b. Group 3 storage tanks shall be operated so that the floating roof including the seal closure devices meet each of the following requirements:

- i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof [35 IAC 218.123(b)(2)];
- ii. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:
 - A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 218.123(b)(3)(A)];
 - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 218.123(b)(3)(B)]; and
 - C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting [35 IAC 218.123(b)(3)(C)].
- c. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected Group 1 or Group 2 tank, except during sampling or maintenance operations [35 IAC 218.121 (b)(1)].

7.3.8 Inspection Requirements

- a. The Permittee shall fulfill the applicable testing and procedures requirements of 40 CFR 60.113b(a) for each Group 1 affected tank equipped with an internal floating roof as follows:
 - i. Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once ever 12 months (Annual Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., the internal floating roof is not resting on the surface of the VOL inside the storage tank, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric) that the Permittee must repair or otherwise remove the storage tank from service. [40 CFR 60.113b(a)(2) and (a)(3)(ii)]

- ii. Visually inspect the internal floating roof the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes (if any), and sleeve seals (if any) each time the storage vessel is emptied and degassed (Out-of Service Inspection) to identify any deficiency or shortcoming in the roof's features, (i.e., internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area) that the Permittee shall repair the features prior to refilling the storage tank with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR 60.113b(a) (2) and (a) (3(ii)) and at intervals no greater than 5 years in the case of vessels specified in 40 CFR 60.113b(a) (3) (i). [40 CFR 60.113b(a) (3) (i) and (a) (4)]

- iii. Prior notification for the above inspection shall be given to the Illinois EPA as specified in Condition 7.3.10(a) (ii).

- b. The Permittee shall inspect the floating roof seals of each affected Group 3 tank when storing a VOL with a vapor pressure of 1.5 psia or greater once every six months. Compliance will be demonstrated with the timing of the inspections if two inspections occur within a calendar year with one taking place in January through June and the second taking place in July through December; or if the inspections are not more than 190 days apart. [35 IAC 218.123(b) (4)].

- c. The Permittee shall perform a complete inspection of the cover and seals of each affected Group 2 tank whenever the tank is emptied and degassed for any reasons other than the transfer of liquid during the normal operation of the tank, or whenever repairs are made that require the tank to be emptied and degassed as a result of any semi-annual inspection or incidence of roof damage or defect [35 IAC 218.123(b) (5)].

- d. When any tank is in ethanol service (VOL), the following inspection requirements will apply:

- i. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service) prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. [35 IAC 218.127(a) (1)]

- ii. For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this subsection cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the owner or operator may request a 30-day extension from the Illinois EPA in the inspection report required in 35 IAC 218.129(a) (3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the owner or operator will take that will assure that the control equipment will be repaired or the vessel will be emptied within 30 days. [35 IAC 218.127(a) (2)]

- iii. For vessels equipped with both primary and secondary seals:
 - A. Visually inspect the vessel as specified in subsection (iv) below at least every 5 years; or
 - B. Visually inspect the vessel as specified in subsection (ii) above.

- iv. Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any) each time the

storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal, or if the seal fabric or the secondary seal has holes, tears, or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this subsection exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels subject to the annual visual inspection as specified in subsections (ii) and (iii) (B) above and at intervals no greater than 5 years in the case of vessels specified in subsection (iii) (A) above.

- v. Notify the Illinois EPA in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by subsections (i) and (iv) above to afford the Illinois EPA the opportunity to have an observer present. If the inspection required by subsection (iv) above is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Illinois EPA at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Illinois EPA at least 7 days prior to the refilling. [35 IAC 218.127(a) (5)]

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected storage tank to demonstrate compliance with Conditions 5.5.1, 7.3.3, 7.3.5, 7.3.6, 7.3.7, and 7.3.8, pursuant to Section 39.5(7) (b) of the Act:

- a. The Permittee shall fulfill the applicable recordkeeping requirements of 40 CFR 60.115b for each affected Group 1 tank pursuant to 40 CFR 60.115b(a), as follows:

Keep a record of each Annual and Out-of-Service Inspection performed as required by Condition 7.3.8(a) and (b). [40 CFR 60.115b(a)(2)]

- i. The date the inspection was performed;
 - ii. Who performed the inspection;
 - iii. The method of inspection;
 - iv. The observed condition of each feature of the internal floating roof (seals, roof decks and fittings), with the raw data recorded during the inspection; and
 - v. Summary of compliance.
- b. The Permittee shall maintain records of the following for each affected tank to demonstrate compliance with the Out-of-Service Inspection requirements of Condition 7.3.8(b)(i):
- Records that are sufficient to identify whenever the tank is empty for any reason or whenever repairs are made as a result of regular inspection or incident of roof damage or defect.
- c. The Permittee shall keep the operating records required by 40 CFR 60.116b for each affected tank, as follows:
- Records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]
- d. The Permittee shall maintain records of the VOM emissions from each affected storage tank in accordance with the procedures outlined in Condition 5.6, so as to demonstrate compliance with the emission limitations of Condition 7.3.6.
- e. Monthly records of VOL throughput through the affected Tank No. 83 and annual for all other tanks.
- f. Monthly records of VOM emissions attributable to the affected Tank No. 83 and annual for all other tanks.
- g. In addition to the records required by Condition 5.6 (requiring records of throughput and emissions), the Permittee shall maintain records of the following items for each affected tank (Group 1 and 2) in VPL

service, pursuant to 35 IAC 218.123(b) (6) or 40 CFR 60.113:

- i. A list of the types of volatile petroleum liquid stored on a monthly basis;
- ii. The maximum true vapor pressure of each type of liquid as stored, psia; and
- iii. For Group 2 tanks the results of any inspections or measurements required by the Condition 7.3.8(a) and/or (b), including:
 - A. Type of inspection;
 - B. When the inspection and/or measurement was performed;
 - C. Who performed the inspection and/or measurement;
 - D. The method of inspection and/or measurement;
 - E. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
 - F. Summary of compliance.
- h. The Permittee shall maintain records of the following for each affected Group 2 tank to demonstrate compliance with Condition 7.3.8(b) (Cover and Seal Inspection) [35 IAC 218.123(b) (6)]:

Records that are sufficient to identify whenever the tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect.
- i. When any tank is in VOL service (ethanol) the Permittee shall maintain records and furnish reports as required below.
 - i. Keep a record of each inspection performed as required by Condition 7.3.8(c). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control

equipment (seals, internal floating roof, and fittings);

- ii. If any of the conditions described in Condition 7.3.8(c) are detected during the annual visual inspection required, report to the Illinois EPA within 30 days after the inspection the identity of the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made; and
- iii. After each inspection required Condition 7.3.8(c) (iii) where holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in Condition 7.3.8(c) are discovered, report to the Illinois EPA within 30 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of Conditions 7.3.5(e) or 7.3.8(c) and list each repair made. [35 IAC 218.127(a)]

7.3.10 Reporting Requirements

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

- a. The Permittee shall submit written notifications and reports to the Illinois EPA, Compliance Section as required by the NSPS, for each affected tank, as follows:
 - i. A report identifying any deficiencies or shortcomings identified in the Annual Inspection required by Condition 7.3.8(a) within 30 days of inspection. This report shall include the information specified in 40 CFR 60.115b(a)(3).
 - ii. A.
 - Notification at least 30 days prior to refilling an affected tank for which an Out-of-Service inspection is required by Condition 7.3.8(b)(i) to afford the Illinois EPA with the opportunity to have an observer present. [40 CFR 60.113b(a)(5)]
 - B. If the inspection is not planned and the owner or operator of the tank could not

have known about refilling the tank 30 days in advance, a shorter notification may be accepted as provided for in 40 CFR 60.113b(a) (5) .

- iii. A report identifying any deficiencies or shortcomings identified in the Out-of-Service Inspection within 30 days of the inspection required by Condition 7.3.8(b) (i). This report shall include the information specified in 40 CFR 60.115b(a) (4).
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7) (f) (ii) of the Act:
- i. Any 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 7.3.5, e.g., no "secondary seal," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
 - ii. Any storage of VOL 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, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.
 - iii. Any exceedance of the emission and operational limits shown in Conditions 7.3.6(b) and 7.3.7(b), respectively.
- c. Any 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 permanent submerged loading pipe," within 5 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

- d. Any 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, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected storage tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the Condition 7.3.5 of this permit.
- b. Changes accounted for in Condition 5.8.
- c. The primary seals may be replaced with the same or a different type. Secondary seals may be replaced but must be rim-mounted.

7.3.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use of the TANKS program, AP-42 upon which the TANKS program is based, or any other method that utilizes USEPA approved emission factors for storage tank emissions.
- b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt. percent (based on a 1992 USEPA survey or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by that product is acceptable. Other means of establishing HAP emissions utilizing USEPA accepted methodologies is also acceptable.

7.4 Unit: Fixed Roof Tanks
Control: Vapor Control Sphere on Four Tanks

7.4.1 Description

The Permittee operates several fixed roof tanks. Typically large fixed roof tanks cannot store gasoline, but four of the Permittee's fixed roof tanks that contain gasoline have a closed vent technology called a vapor control sphere.

These fixed roof tanks have been divided into three groups. Group 1 tanks are large tanks that use the vapor control sphere. Group 2 are large tanks that store only low vapor pressure materials. Group 3 tanks are small tanks that do not have the low vapor pressure requirement.

The state of all storage tanks at this source, including the above tanks, is listed in Attachment 1.

Although the description specifies "containing petroleum products", they may store materials that are not organic materials (e.g., wastewater or remediation water).

7.4.2 List of Emission Units and Air Pollution Control Equipment

Tank No.	Description	Emission Control Equipment
Group 1 - Fixed Roof Tanks Vented to Vapor Control Sphere		
47	Fixed Roof Tank Containing Petroleum Products, Nominal Capacity 2,117,000 Gallons	Vapor Control Sphere, VCS #1
73, 75, 76	Fixed Roof Tanks Containing Petroleum Products, Nominal Capacity 472,500 Gallons Each	Vapor Control Sphere, VCS #1
Group 2 - Fixed Roof Tanks Over 40,000 Gallons Capacity		
52	Fixed Roof Tank Containing Petroleum Products, Nominal Capacity 2,538,000 Gallons	None
77, 78	Fixed Roof Tanks Containing Petroleum Products, Nominal Capacity 472,500 Gallons Each	None
Group 3 - Fixed Roof Tanks Under 40,000 Gallons Capacity		
5, 90, 95, 96	Fixed Roof Tanks, Nominal Capacity in Gallons: No. 5 - 29,000; No. 90 - 20,000; Nos. 95 and 96 - 16,000 Each	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected Group 1 Tank" for the purpose of these unit-specific conditions, is a storage tank that may store both a volatile petroleum liquid (VPL, e.g.

gasoline) with a vapor pressure greater than 1.5 psia at 70°F or a volatile organic liquid (VOL, e.g. ethanol) with a vapor pressure greater than 0.75 psia, is over 40,000 gallons in capacity, constructed prior to June 11, 1973, and equipped with a vapor control sphere as described in Condition 7.4.2.

- i. When storing a VOL with a vapor pressure greater than 0.75 psia, the vapor control sphere does not meet the requirement of 35 IAC 218.120(a)(4) for a closed vent system and 95% efficient control device, since there is no control device but does qualify for § 218.120(a)(5) as an alternative emission control plan that is equivalent to the just cited closed system 95% reduction requirement that is approved by the Illinois EPA and the USEPA in a federally enforceable permit (this CAAPP).
 - ii. When storing a VPL, Group 1 storage tanks in conjunction with the vapor control sphere are subject to 35 IAC 218.121(a), that is it is a pressure tank capable of withstanding the vapor pressure of such liquid or the pressure of the gas, so as to prevent vapor or gas loss to the atmosphere at all times. These tanks are eligible for three alternate methods of compliance but are currently not equipped with a floating roof [§ 218.121(b)(1)], a vapor recovery system consisting of a vapor gathering system and a vapor disposal system [§ 218.121(b)(2)], or other equipment or means of equal efficiency approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with Section 218.108 [§ 218.121(b)(3)].
- b. An "affected Group 2 tank", for the purpose of these unit-specific conditions, is a fixed roof storage tank with a capacity greater than 40,000 gallons that is used to store a petroleum liquid with a maximum true vapor pressure of less than 0.5 psia.
 - c. An "affected Group 3 tank", for the purpose of these unit-specific conditions, is a fixed roof storage tank with a design capacity of less than 40,000 gallons.
 - d. Each affected storage tank is subject to the emission limits identified in Condition 5.2.2.

7.4.4 Non-Applicability of Regulations of Concern

- a. The affected Group 2 and 3 tanks are not subject to the requirements of 40 CFR 60 Subparts K, Ka or Kb, because the tank(s) were constructed prior to the applicability dates of each NSPS or have a design capacity less than the capacity that would require control equipment. Tank 5 does not store a VOL. The Group 1 tanks that are not subject to NSPS were constructed prior to the applicable dates. [40 CFR 60.110(a), 60.110a(a), and 60.110b(a)]
- b. The affected Group 3 tanks are not subject to 35 IAC 218.120, 121 and 123 because the tank capacities are less than or equal to 40,000 gallons. [35 IAC 218.119(g), 218.121 and 218.123(a) (2)]
- c. An affected tank is not subject to the requirements of 35 IAC Part 218, Subparts QQ or TT, because the affected tank is subject to 35 IAC 218, Subpart B. [35 IAC 218.940(a) and (b) and 218.980(a) and (b)]
- d. The Group 2 storage tanks are not subject to 35 IAC 218.122(b) because that rule requires a submerged loading pipe only if the vapor pressure is over 2.5 psia and the Group 2 tanks are limited to a vapor pressure of less than 0.5 psia.
- e. This permit is issued based on the affected storage tanks not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected storage tanks do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels and/or uses a passive control measure, such as a seal, lid, or roof, that is not considered a control device because it acts to prevent the release of pollutants.

7.4.5 Control Requirements

Each affected storage tank which contains a material with a vapor pressure over 2.5 psia shall be equipped with a permanent submerged loading pipe. [35 IAC 218.122(b)]

7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.4.7 Operating Requirements

None

7.4.8 Monitoring Requirements

The vapor control sphere for the Group 1 tanks shall be equipped with a continuous monitoring system to verify that the vapor sphere is operating in the proper pressure range pursuant to the design specifications.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected storage tank to demonstrate compliance with Conditions 5.5.1, 7.4.3, 7.4.5 and 7.4.8, pursuant to Section 39.5(7) (b) of the Act:

- a. Vapor pressure of material stored in each tank (psia).
- b. Material throughput for each tank (gal/yr).
- c. Pressure in the vapor control sphere (continuous) and the acceptable range for the pressure.
- d. VOM emissions from each tank (lb/yr).

7.4.10 Reporting Requirements

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

- a. Continuous monitoring systems indicates the vapor control sphere is operating for over four hours outside the normal operating range, within 5 days.
- b. Any storage of a VOM with a true vapor pressure greater than 0.5 psia in an affected Group 2 storage tank within 5 days of becoming aware of the non-compliance status.
- c. These notifications shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected storage tank without prior notification to the Illinois EPA or

revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in the material stored in a tank, provided the tank continues to comply with the Conditions in Section 7.2 of this permit.

7.4.12 Compliance Procedures

- a. Emissions from each affected storage tank shall be determined through the use of the TANKS program.
- b. For the purpose of estimating HAP emissions from equipment at the facility, the vapor wt percent (based on a 1992 USEPA survey or calculations based upon the applicable MSDS for the specific VOL) of each HAP for each product times the VOM emissions contributed by the product is acceptable.

7.5 Wastewater Treatment System and Thermal Oxidizer

7.5.1 Description

The wastewater treatment plant is a continuous process that utilizes a combination of chemical and gravitational mechanisms to remove contaminants from the refinery wastewater prior to its discharge into the Metropolitan Water Reclamation District. Emissions of organic material are controlled by a thermal oxidizer.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Wastewater Treatment Plant	API Separators (Floating Oil and Solids Gravity Separation Process) and Dissolved Air Flotation Units (Oil/Solids Separation by way of Chemical Coagulation and Air Flotation)	Thermal Oxidizer

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected wastewater treatment system" for the purpose of these unit-specific conditions, is the wastewater treatment system described in Conditions 7.9.1 and 7.9.2.
- b. The affected wastewater treatment system is subject to the emission limits identified in Condition 5.2.2.
- c. No person shall use any single or multiple compartment effluent water separator which receives effluent water containing 757 l/day (200 gal/day) or more of organic material from any equipment processing, refining, treating, storing or handling organic material unless such effluent water separator is equipped with air pollution control equipment capable of reducing by 85 percent or more the uncontrolled organic material emitted to the atmosphere. Exception: If no odor nuisance exists the limitations of this subsection shall not apply if the vapor pressure of the organic material is below 17.24 kPa (2.5 psia) at 294.3°K (70°F) [35 IAC 218.141(a)].
- d. i. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception:

If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall apply only to photochemically reactive material [35 IAC 218.301].

- ii. Emissions of organic material in excess of those permitted by Condition 7.5.3(d) (i) are allowable if such emissions are controlled by a flame or thermal incineration (oxidizer) so as to either reduce such emissions to 10 ppm equivalent methane or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water. [35 IAC 218.302(a)]

7.5.4 Non-Applicability of Regulations of Concern

- a. The affected wastewater treatment operations are not subject to the NSPS for VOC Emissions From Petroleum Refinery Wastewater Systems, 40 CFR 60 Subpart QQQ, because the affected wastewater treatment operations are not located at a petroleum refinery.
- b. The affected wastewater treatment operations are not subject to 35 IAC 218.443, Wastewater (Oil/Water) Separator, because the affected wastewater treatment operations are not located at a petroleum refinery.
- c. This permit is issued based on the affected wastewater treatment operations not being subject to 35 IAC 218 Subpart TT, Other Emission Units, because the affected wastewater treatment operations do not meet the applicability of 35 IAC 218.980(a). In particular, the affected wastewater treatment operations have maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year.

7.5.5 Operational and Production Limits and Work Practices

- a.
 - i. The thermal oxidizer shall be in operation at all times when the affected wastewater treatment system is in operation and emitting air contaminants that would not comply with Condition 7.5.3 without the use of the thermal oxidizer.
 - ii. The thermal oxidizer combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation.

7.5.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.5.7 Operating Requirements

The capture system and thermal oxidizer shall be operated to reduce VOM emissions by 85% so as to comply with Condition 7.5.3(c) and (d).

7.5.8 Monitoring Requirements

The thermal oxidizer shall be equipped with a continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor's specifications at all times that the thermal oxidizer is in use. This device shall monitor the thermal oxidizer combustion chamber temperature.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected wastewater treatment system to demonstrate compliance with Conditions 5.5.1, 7.5.3, 7.5.5, 7.5.7, and 7.5.8, pursuant to Section 39.5(7)(b) of the Act:

- a. Thermal oxidizer combustion chamber temperature (continuous);
- b. The amount of wastewater treated, gal/day and gal/year; and
- c. VOM and HAP emissions (lb/month).

7.5.10 Reporting Requirements

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

Operation of the system without the thermal oxidizer and not complying with Condition 7.5.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

Compliance with the requirements of Condition 7.5.3(c) and (d) (35 IAC 218.141 and 218.302) is assured by compliance with the operational requirements of Condition 7.5.5, the monitoring requirements of Condition 7.5.8 and the recordkeeping requirements in Condition 7.5.9.

7.6 Unit: Fugitives from Leaking Components
Control: None

7.6.1 Description

Fugitive emissions from equipment components, those not included in the loading rack emissions, such as valves, flanges, etc., are generated during the processing of material through the piping distributed throughout the source.

7.6.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Equipment Components (Valves, Flanges, Pump Seals, etc.)	Processing of Material Throughout the Source's Piping System	Work Practices and Equipment Replacement

7.6.3 Applicability Provisions

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.

7.6.4 Non-Applicable Regulations

None

7.6.5 Control Requirements

None

7.6.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide limitations in Condition 5.5 that include the emissions from applicable units.

7.6.7 Operating Requirements

The Permittee shall repair any component from which a leak of VOL can be observed. The repair shall be completed as soon as practicable but no later than 15 days after the leak is found. If the leaking component cannot be repaired

until the process unit is shut down, the leaking component must then be repaired before the unit is restarted.

7.6.8 Inspection Requirements

The Permittee shall visually inspect for leaks from all affected equipment components on a monthly basis.

7.6.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the piping components at the source to demonstrate compliance with Condition 7.7.4 pursuant to Section 39.5(7)(b) of the Act.

- a. The number of components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or vapor service, as applicable
- b. Emissions of VOM attributable to fugitive losses (valves, pump seals, etc.), tons/month and tons/year, with supporting calculations, calculated utilizing the compliance procedures in Condition 7.7.12 or other approved USEPA methodology;

7.6.10 Reporting Requirements

None

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to these units without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

None

7.6.12 Compliance Procedures

Compliance with the overall VOM emissions limitation of Condition 5.5 shall be demonstrated through the calculation of the following equation or other approved USEPA Methodology:

$$\text{Total Fugitive VOM Emissions (lb/hr)} = \sum_{i=1} EF_i \times N_i$$

Where:

EF_i = The specific component's (i.e., valves, pump seals, etc.) emission factor listed below. Emission factors found in "Development of Fugitive Emission Factors and Emission Profiles for Petroleum Marketing Terminals, Volume 1, Published by the American Petroleum Institute; and

Component	Light liquid ^a	Heavy liquid ^b	Vapor ^c
Connectors	2.3×10^{-5}	Negligible	6.7×10^{-5}
Valves	1.5×10^{-4}	Negligible	1.6×10^{-4}
Open-Ended Lines	6.7×10^{-3}	Negligible	6.7×10^{-3}
Pump Seals	9.3×10^{-4}	Negligible	0.00
Other ^d	2.87×10^{-4}	Negligible	2.65×10^{-4}

^a Light liquid - not in gas/vapor service or heavy liquid service.;

^b Heavy liquid - material in a liquid state in which the with a vapor pressure less than or equal to 0.1 psia at 100° F

^c Vapor - material in a gaseous state at operating conditions; and

^d Other means any components other than connectors, valves, open-ended lines, and pump seals

N_i = Number of specific components (i.e., valves, pump seals, etc.) in light liquid, heavy liquid or gas service as recorded in the records required in Condition 7.7.9.

Total annual emissions, in tons/year, shall be calculated by multiplying the hourly emission by 8760 hr/year.

Fugitive HAP emissions from equipment components, other than those included in the loading rack emissions, shall be determined by speciating the individual HAP emissions as a percentage of the gasoline and ethanol throughputs (e.g., hexane represents 1.4% by weight of the VOM in gasoline) and calculating individual HAP emissions as in (c) above. Total fugitive HAP emissions will be based on the sum of the emissions for each individual HAP.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after July 3, 2003 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

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

8.3 Emissions Trading Programs

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

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

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

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

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

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

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

8.6.2 Test Notifications

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

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

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

8.6.3 Test Reports

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

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

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

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

iv. USEPA Region 5 - Air Branch

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

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

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

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

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

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

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

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

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

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

9.2.2 Duty to Maintain Equipment

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

9.2.3 Duty to Cease Operation

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

9.2.4 Disposal Operations

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

9.2.5 Duty to Pay Fees

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

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

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

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

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

9.5 Liability

9.5.1 Title

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

9.5.2 Liability of Permittee

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

9.5.3 Structural Stability

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

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

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

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

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

9.6.2 Records of Changes in Operation

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

9.6.3 Retention of Records

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

9.7 Annual Emissions Report

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

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

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

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

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

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

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

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

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

9.12.2 Reopening and Revision

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

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

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

9.12.4 Duty to Provide Information

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

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7) (i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5) (1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 Significant Storage Tanks

Table 1 - External Floating Roof Tanks^a

<u>Tank No.</u>	<u>Nominal Capacity (Gallons)</u>
54	2,520,000
56	3,020,000
801	3,770,000
802	3,770,000
803	3,770,000
806	3,770,000
807	3,770,000
808	3,770,000

^a Tank 54 stores gas oil, which has a vapor pressure similar to crude oil. The remaining tanks may store gasoline, which is a worst case situation for vapor pressure and HAP content; therefore any VOL with a vapor pressure under 11.1 psia may be stored in these tanks. All of the tanks have a metallic shoe primary seal and rim-mounted secondary seals. All floating roof tanks have no vapor space and meet the requirement for submerged loading. All tanks were constructed prior to 1972 and therefore are not subject to NSPS.

Table 2 - Internal Floating Roof Tanks^a

<u>Tank No.</u>	<u>Nominal Capacity (Gallons)</u>	<u>Primary Seal</u>	<u>Date Constructed</u>	<u>NSPS Status</u>
40	1,701,000	Liquid-Mounted	Pre-1972	
41	1,701,000	Vapor-Mounted ^b	Pre-1972	
42	1,701,000	Vapor-Mounted ^b	Pre-1972	
44	945,000	Vapor-Mounted ^b	Pre-1972	
46	2,113,000	Liquid-Mounted	Pre-1972	
65	160,000	Liquid-Mounted	Pre-1972	
67	162,000	Liquid-Mounted	1999	Kb
74	473,000		1990	Kb
83	630,000	Liquid-Mounted	Pre-1972 ^c	
91	945,000	Liquid-Mounted	1980	Ka
92	945,000	Liquid-Mounted	1980	Ka
93	945,000	Liquid-Mounted	1980	Ka
97	135,000	Liquid-Mounted	Pre-1972	
323	95,000	Liquid-Mounted	1986	Kb
804	3,764,000	Liquid-Mounted	Pre-1972	

^a These tanks may store petroleum products (VPLs) or ethanol (VOL).

^b The tanks with vapor-mounted primary seals also have rim-mounted secondary seals.

^c Tank constructed Pre-1972, Floating roof was added later.

Table 3 - Fixed Roof Tanks

<u>Tank No.</u>	<u>Nominal Capacity (Gallons)</u>	<u>Material Stored</u>	<u>Maximum Vapor Pressure (psia)</u>	<u>Control</u>	<u>Year Built</u>
47	2,117,000	Petroleum Products	11.1	Vapor Control Sphere	Pre-1972
73	472,500	Petroleum Products	11.1	Vapor Control Sphere	Pre-1972
75	472,500	Petroleum Products	11.1	Vapor Control Sphere	Pre-1972
76	472,500	Petroleum Products	11.1	Vapor Control Sphere	Pre-1972
5	29,000	Caustic	4.0	None	2000
52	2,538,000	Asphalt	0.5	None	Pre-1972
77	472,500	Diesel	0.5	None	Pre-1972
78	472,500	No. 1 Oil	0.5	None	Pre-1972
90	20,000	Slop	11.1	None	1980
95	16,000	Ethanol	11.1	None	Pre-1972
96	16,000	Ethanol	11.1	None	Pre-1972

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
 - Do not violate any applicable requirement;
 - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



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

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. number:
	Permit number:
Date received:	

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance certification for the source. For this purpose, the Illinois EPA will accept a copy of the most recent form 401-CAAPP, ANNUAL COMPLIANCE CERTIFICATION submitted to the Illinois EPA.
3. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
4. Information addressing any outstanding transfer agreement pursuant to the ERMS.
5.
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.
 - b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

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