217/782-2113

"REVISED"

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Panhandle Eastern Pipe Line Company
Attn: Marc N. Phillips, Principal Engineer
Post Office Box 4967
Houston, Texas 77210-4967

Application No.: 95120052 I.D. No.: 149820AAB
Source Location: 4 ½ Miles S.E. Atlas on Highway 96, Pleasant Hill, Pike County
Operation of: Pleasant Hill Compressor Station
Date Received: March 8, 2004
Date Issued: March 8, 2005 Expiration Date: March 7, 2010
Responsible Official: Jeryl Mohn, Senior Vice-President, Operations, Engineering and Construction

This permit is hereby granted to the above-designated Permittee to operate a natural gas compressor station, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: August 3, 2007
Revision Date Issued:
Purpose of Revision: Minor Modification

This minor modification consists of incorporating the changes in the following construction permits:

Construction Permit #04120048 which consists of installing NO_x control system for engines #1015 and #1016. Also install like-kind component replacement for turbines #1018 and #1019.
Construction Permit #06050021 which consists of installing NO_x control system for engine #1017.
Construction Permit #00100026 this permit has been revised to show the replacement of six existing engines (#1001-#1006) with two solar gas turbines (#1018 and #1019) equipped with low NO_x combustors. This permit also authorizes operation flexibility for these turbines. See section 7.2.11.

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

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

ECB:MA:psj

cc: Illinois EPA, FOS Region 2

1 This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

2 Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Panhandle Eastern Pipe Line Company
4 1/2 Mile Southeast of Atlas on Highway 96
Pleasant Hill, Illinois 62366
217/734-2319

I.D. No.: 149820AAB
County: Pike
Standard Industrial Classification: 4922, Natural Gas Transmission

1.2 Owner/Parent Company

Panhandle Eastern Pipe Line Company
P.O. Box 4967
Houston, Texas 77210-4967

1.3 Operator

Panhandle Eastern Pipe Line Company
P.O. Box 4967
Houston, Texas 77210-4967

Marc Phillips, Principal Engineer
713/646-7646

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

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
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
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
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM10	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
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
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 CONDITIONS FOR 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:

Self-Contained Bead Blasting Cabinet

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:

None

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:

a. 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)].

b. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

c. Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

d. 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). Note: These activities are not required to be individually listed.

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 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 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 (see Attachment 2) and 35 IAC Part 266. 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.

3.2.2 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, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.3 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182.

3.2.4 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia, the Permittee shall comply with the applicable requirements of 35 IAC 215.122, which requires use of a permanent submerged loading pipe, submerged fill, a vapor recovery system, or an equivalent device approved by the Illinois EPA. [Note: storage tanks used for storing gasoline and any hazardous air pollutants are not illegible for insignificant activities].

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	Description	Date of Construction	Emission Control Equipment
Unit 01 Internal Combustion Engines	Six (6) Reciprocating Engines (Clark, Model RAS-8, 800 HP Each, #1007-#1012)	1943 - 1945	None
	Two (2) Reciprocating Engines (Cooper-Bessemer, Model GMW 10, 2,400 HP Each, #1013-#1014)	1947 - 1013 1950 - 1014	None
	Three (3) Reciprocating Engines (Cooper-Bessemer, Model GMW 10, 3,400 HP Each, #1015-#1017)	1963 - 1015 1964 - 1016 1966 - 1017	None
Unit 02 Turbines	Two Combustion Turbines (Solar Saturn, 6,130 HP ISO Rated Each, #1018-#1019) with Integral Low NO_x Combustion Burners	2001	None
Unit 03 Fugitive Emissions	Fugitive Losses from Leaking Piping Components	N/A	None

5.0 Overall Source Conditions

5.1 General Source Description

5.1.1 The source employs reciprocating compressor engines and turbines to recompress and move natural gas through transmission pipelines. Line pressure must be maintained in order to ensure natural gas moves in sufficient volumes for reliable service at all delivery points.

5.1.2 This source is located in an area that is in attainment of the National Ambient Air Quality Standards for all pollutants.

5.2 Major Source Status

5.2.1 This permit is issued based on the source requiring a CAAPP permit as a major source of NO_x and HAP emissions.

5.3 General Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 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.

b. Pursuant to 35 IAC 212.123(a), 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, except as allowed by 35 IAC 212.123(b) and 212.124.

c. Pursuant to 35 IAC 237.102, no person shall cause or allow open burning, except the Illinois EPA may grant permits for open burning in accordance with 35 IAC 237.201.

5.3.3 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.

5.3.4 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 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 RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.5 Future Emission Standards

a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B 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 Condition 9.8. This permit may also have to be revised or reopened to address such new regulations (see Condition 9.12.2).

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 regulations under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

5.3.5 Episode Action Plan

a. 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 an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

5.4 General Non-Applicability of Regulations of Concern

General non-applicability of regulations of concern are not set for this source. However, there may be unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

5.5 General Source-Wide Control Requirements and Work Practices

General source-wide control requirements and work practices are not set for this source. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 General Source-Wide Production and Emission Limitations

5.6.1 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 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	126.71
Sulfur Dioxide (SO_2)	1.81
Particulate Matter (PM)	23.73
Nitrogen Oxides (NO_x)	1,173.98
HAP, not included in VOM or PM	----
Total	1,326.23

5.6.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.6.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, state 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.

5.7 General Testing Requirements

Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 General Monitoring Requirements

General monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 General Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Records for HAP Emissions

The Permittee shall maintain records of HAP emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit, pursuant to Section 39.5(7)(b) of the Act.

5.9.3 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.

5.10 General Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source 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. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

5.10.2 Annual Emissions Report

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

5.11 General Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.

5.12 General Compliance Procedures

5.12.1 General Procedures for Calculating Emissions

a. Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be based on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

5.13 Special Permit Shield

N/A

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

This section is reserved for emissions control programs. As of the date of issuance of this permit, there are no such programs applicable to this source.

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Natural Gas Fired Internal Combustion Engines

7.1.1 Description

The Permittee operates 2-cycle lean burn and 4-cycle lean burn natural gas fired internal combustion engines which provide power to compressor units at the source that move natural gas through the source's associated transmission pipelines. The principle source of emissions is the engines exhaust. "Blowdown Emissions" also occur during the venting of pressurized natural gas from the compressors and engines after shutdown for safety reasons.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Internal Combustion Engines	Six (6) Reciprocating Engines (Clark, Model RAS-8, 800 HP Each, #1007-#1012)	1943 – 1945	None
	Two (2) Reciprocating Engines (Cooper-Bessemer, Model GMW 10, 2,400 HP Each, #1013-#1014)	1947 - 1013 1950 – 1014	None
	Three (3) Reciprocating Engines (Cooper-Bessemer, Model GMW 10, 3,400 HP Each, #1015-#1017)	1963 - 1015 1964 - 1016 1966 – 1017	Low Emission Combustion Technology (LECT)

7.1.3 Applicable Provisions and Regulations

a. An "affected engine" for the purpose of these unit specific conditions, is a natural gas fired internal combustion which provides power to compressor units at the source described in Conditions 7.1.1 and 7.1.2.

b. Each affected engine is subject to the emission limits identified in Condition 5.3.2.

c. Each affected engine is subject to 35 IAC 215.301 and is not allowed to discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere.

d. Startup Provisions

The Permittee is authorized to operate affected engines in violation of the applicable standards in Condition 7.1.3(b) during startup subject to the following provisions. This authorization is provided pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all

reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups.

i. This authorization only extends for a period of up to two hours following initial firing of natural gas during each startup event. As provided by 35 IAC 201.265, this authorization does not shield the Permittee from enforcement for any such violation and shall only constitute a prima facie defense to such an enforcement action provided that the Permittee has fully complied with all associated terms and conditions.

ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups, and minimize the frequency of startups:

The Permittee shall conduct startup of each affected engine in accordance with the manufacturer's written instructions or other written instructions prepared by the Permittee and maintained on site and that include, at a minimum, the following measures:

A. Review of the operational condition of an affected engine prior to initiating startup of the affected engine.

B. Review of the operating parameters of an affected engine during each startup to make appropriate adjustments to the startup to reduce or eliminate excess emissions.

iii. The Permittee shall fulfill applicable recordkeeping requirements of Condition 7.1.9.

iv. Any startup that does not meet the requirements of this condition would be considered a deviation and the reporting requirements of Condition 7.1.10 would apply.

7.1.4 <u>Non-Applicability of Regulations of Concern</u>

a. This permit is issued based on the affected engines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because neither of the affected engine does use an add-on control device to achieve compliance with an emission limitation or standard.

b. This permit is issued based on the affected engines not being subject to 40 CFR Part 63, Subpart ZZZZ, because lean-burn engines exempt from requirements of this Subpart, pursuant to 40 CFR 63.6590(b)(3).

c. Each affected engine is not subject to the requirements of 35 IAC 212.322 because it does not have a process weight rate as defined in 35 IAC 211.5250.

d. Each affected engine is not subject to the requirements of 35 IAC 215.143 because the blowdown emissions associated with engines are not considered to be vapor blowdown pursuant to 35 IAC 215.143.

7.1.5 Control Requirements and Work Practices

Control requirements are not set for affected engines. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be requirements for general source-wide control requirements set forth in Condition 5.5.

7.1.6 Production and Emission Limitations

Production and emission limitations are not set for affected engines. However, there are general source-wide production and emission limitations set forth in Condition 5.6.

7.1.7 Testing Requirements

Testing requirements are not set for affected engines. However, there are general testing requirements in Conditions 5.7 and 8.5.

7.1.8 Monitoring Requirements

Monitoring requirements are not set for affected engines. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit. Also, appropriate recordkeeping requirements of Condition 7.1.9 along with compliance procedures of Condition 7.1.12 allow monitoring of compliance with Condition 7.1.3(c).

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected engines to demonstrate compliance with Condition 5.6.1 and 7.1.3(c), pursuant to Section 39.5(7)(b) of the Act:

a. Annual aggregate NO_x, PM, SO_2, and VOM emissions from the engines, based on hours of operation and the applicable emission factors, with supporting calculations;

b. Hours of operation for each engine per year; and

c. Records for startup.

The Permittee shall maintain the following records, pursuant to Section 39.5(7)(b) of the Act, for each affected engine subject to Condition 7.1.3(e), which at a minimum shall include:

i. The following information for each startup of affected engines:

A. Date and duration of the startup, i.e., start time and time normal operation achieved.

B. If normal operation was not achieved within two hours, an explanation why startup could not be achieved within this time.

C. A detailed description of the startup, including reason for operation.

D. An explanation why established startup procedures could not be performed, if not performed.

E. Whether exceedance of Condition 5.3.2 may have occurred during startup. If an exceedance may have occurred, an explanation of the nature of opacity, i.e., severity and duration, during the startup and the nature of opacity at the conclusion of startup.

ii. A maintenance and repair log for each affected engine, with a listing of each such activity performed with date.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected engines with the permit requirements, 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.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected engines. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.1.12 Compliance Procedures

a. Compliance with Condition 7.1.3(c) for each affected engine is addressed by the records required in Condition 7.1.9 and the following equation:

VOM Emissions (lb/hr) = Annual VOM Emissions (as calculated by Condition 7.1.12(b))/Hours of operation

b. Compliance with the emission limits in Condition 5.6 is addressed by the records required in Condition 7.1.9 and the emission factors and formulas listed below:

i. Blowdown Emissions

10,000 scf/blowdown x 1.082 lb VOM/mmscf x mmscf/1000 scf = 10.82 lb VOM/blowdown/engine

VOM emissions (lb/yr) = 10.82 lb VOM/blowdown per engine x 75 (number of blowdowns/engine)

VOM Emissions = 75 (number of blowdown)

ii. Hourly Emission Factors (lb/hr, each engine)

Pollutants	Engines 1013-1014	Engine 1015
$N0_x$	105.82*	149.91*
VOM	2.64*	3.74*
PM	0.21**	0.28
SO_2	0.01**	0.02
Formaldehyde	1.14**	1.55*

Pollutants	Engine 1016	Engine 1017
$N0_x$	112.43*	112.43*
VOM	3.44*	3.74*
PM	0.27**	0.27**
SO_2	0.02**	0.02**
Formaldehyde	1.51**	1.49**

* Emission factor is based on the manufacturer's emission factor

** Emission factor is based on AP-42, Table 3.2-1 (7/00)

Engines 1007-1012 are not in service for the last ten years and Permittee requests that standard emission factors from AP-42 for all air pollutants may be applied.

7.2 Turbines

7.2.1 Description

Gas turbines at this station are used to convey natural gas along the interstate pipeline. The gas turbines operate on natural gas.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Turbines	Two Combustion Turbines (Solar Saturn, 6,130 HP ISO Rated Each, #1018-#1019) with Integral Low NO_x Combustion Burners	2001	None

7.2.3 Applicable Provisions and Regulations

a. The "affected turbine" for the purpose of these unit-specific conditions, is a gas turbine described in Conditions 7.2.1 and 7.2.2.

b. Each affected turbine is subject to the emission limits identified in Condition 5.3.2.

c. Each affected turbine is subject to the NSPS for Stationary Gas Turbines, 40 CFR 60 Subparts A and GG, because the heat input at peak load is equal to or greater than 10.7 gigajoules per hour (10 mmBtu/hr), based on the lower heating value of the fuel fired and the gas turbine commenced construction, after October 3, 1977, and that has a heat input peak load less than or equal to 107.2 gigajoules per hour (100 mmBtu/hr). The Illinois EPA administers the NSPS for subject sources in Illinois pursuant to a delegation agreement with the USEPA.

i. Standard for Nitrogen Oxides:

Pursuant to the NSPS, 40 CFR 60.332(a)(2), no owner or operator of an affected gas turbine shall cause to be discharged into the atmosphere from such gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0150 \frac{(14.4)}{Y} + F$$

Where:

STD = Allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = Manufacturer's rated heat rate at manufacturer's peak load (kilojoules per watt hour), or actual measured heat rate based on lower heater value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen calculated from the nitrogen content of the fuel in accordance with 40 CFR 60.332(a)(3).

ii. Standard for Sulfur Dioxide

On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with one or the other of the following conditions:

A. No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.

B. No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.8 percent by weight.

7.2.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected turbines not being subject to 40 CFR Part 63, Subpart YYYY, National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines, because the affected turbines are existing units (constructed prior to January 14, 2003) and, therefore, are exempted from applicability of Subpart YYYY, pursuant to 40 CFR 63.6090(b)(4).

b. This permit is issued based on the affected turbines not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected turbines do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.2.5 Control Requirements and Work Practices

Control requirements are not set for these unit specific emission units. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be

requirements for general source-wide control requirements set forth in Condition 5.5.

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected turbines are subject to the following:

a. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected gas turbine in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or the USEPA which may include, but is not limited to review of operating and maintenance procedures, and inspection of the source [40 CFR 60.11(d)].

b. i. An affected gas turbine shall only be fired with natural gas.

ii. The rated output of each affected gas turbine shall not exceed 6,130 hp, ISO rated conditions.

iii. Natural gas usage from the affected gas turbines shall not exceed 44 mmscf/month and 440 mmscf/year.

c. i. Operation and emissions of each affected gas turbine shall not exceed the following limits:

Total Nitrogen Oxide Emissions		Carbon Monoxide Emissions		Volatile Organic Material Emissions	
(Lb/Hr)	(T/yr)	(Lb/Hr)	(T/yr)	(Lb/Hr)	(T/yr)
4.78	25.0	7.11	35.0	0.16	1.31

These limits are based on the maximum operating rate. The annual limits are based on continuous operation (8,760 hr/yr), at the maximum rate.

ii. The net change in NO_x emissions resulting from the installation of turbines 1018 and 1019, and the removal of engines 1001 through 1006 is a net decrease of 569.2 tons/year.

d. The above limitations were established in Permit 00100026, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). 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 the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

e. 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].

7.2.7 Testing Requirements

Upon the Illinois EPA request, the USEPA methods and procedures shall be used for testing of emissions. For each turbine, measurement of NO_x emissions shall be conducted and data collected in accordance with the test methods and procedures specified in 40 CFR 60.335.

7.2.8 Monitoring Requirements

a. Requirements of 40 CFR 60.334(b) on monitoring of nitrogen content have been waived by the USEPA-Region V letter issued on July 17, 2001. This waiver is based on the August 14, 1987 USEPA Guidance Memorandum that the nitrogen monitoring is waived when pipeline quality natural gas is used because there is no fuel-bound nitrogen and the free nitrogen does not contribute appreciably to the emission of Nitrogen Oxides.

b. Notwithstanding the provisions of 40 CFR 60.334(h(3), the owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in, regardless of whether an existing custom schedule approved by the Administrator for subpart GG requires such monitoring.

The Permittee has chosen the following sources of information to make the required demonstration:

The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for each affected gas turbine to demonstrate compliance with Conditions 5.6.1 and 7.2.6, pursuant to Section 39.5(7)(b) of the Act:

a. An operating log for each affected gas turbine;

b. An inspection, maintenance and repair log for each turbine;

c. Natural gas fuel usage for each affected gas turbine, scf/mo and scf/yr;

d. The documentation that the tariff sheet for natural gas is valid and supports the sulfur content limit in the natural gas, as provided in Condition 7.2.8(b) above;

e. The heat content of the natural gas used in the affected gas turbine, Btu/scf; and

f. Monthly and annual aggregate NO_x, CO, and VOM emissions from the affected gas turbines shall be maintained, based on operating data and the applicable procedures in Condition 7.2.12, with supporting calculations.

7.2.10 Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected turbines with the permit requirements, 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.

b. The Permittee shall submit to the Illinois EPA, Air Compliance Unit, semiannual reports on the sulfur content in the gas, as required by Condition 7.2.8(b) above.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

a. This permit authorizes installation of manufacturer supplied replacement components and assemblies for the affected gas turbines that takes place either as part of scheduled maintenance of the turbines or in the event of malfunction or unscheduled outage and subsequent repairs. This authorization does not address activities for which a construction permit is not required, such as routine preventive maintenance, minor replacement of turbine components or assemblies, or activities that do not involve, either directly or indirectly, emission-related components or activities that do not involve, either directly or indirectly, emission-related components or assemblies of the turbines.

b. This authorization is limited to activities that can be accommodated by the original installation of an affected turbine and in conjunction with an ongoing program of maintenance, repair, and replacement (so as to not constitute a modification of the turbines with respect to the NSPS). The replacement component or assembly must be in good operating condition and come from either a manufacturer or dealer/service provider. This authorization also does not extend to replacement of turbine components or assemblies to such an extent that it

would constitute reconstruction with respect to the NSPS or the NESHAP. (Refer to 40 CFR 60 Subpart A and GG (40 CFR 60.14, 60.15, and 60.330 et. seq.) and 40 CFR 63 Subpart A and YYYY. (40 CFR 63.2 and 63.6080 et. seq).

c. i. This permit does not relax or otherwise revise any requirements and conditions that apply to the operation of the affected Turbines 1018 and 1019, including applicable emission limits, monitoring, testing, recordkeeping, and reporting requirements of this CAAPP permit, which shall continue to apply to the affected turbines.

ii. This permit also does not excuse the Permittee from any new regulatory requirements that are adopted and applicable to the turbines.

d. The Permittee shall expeditiously have performance testing conducted on a turbine following replacement of components or assemblies, as required pursuant to the NSPS, 40 CFR 60 Subpart A and GG, if requested by the Illinois EPA or USEPA.

e. i. The Permittee shall maintain following records at the source for the replacement activities authorized by this permit:

A. A file containing the paperwork for original and replacement turbine components or assemblies, including documentation for turbine model numbers and serial numbers and copies of the specifications for replacements.

B. Details of activities performed pursuant to this permit including, date that the turbine is removed from the service and the date the turbine is returned to service.

ii. Notwithstanding the provisions of this CAAPP permit, the records required by Condition 7.2.11(f)(i) shall be retained for at least five years after the date that the turbine is permanently removed from the service.

f. The Permittee shall notify the Illinois EPA prior to carrying out activities pursuant to this Condition 7.2.11. This notification shall be submitted at least 15 days in advance or as soon as it is practicable to do so, e.g., in the event of turbine failure. This notification shall include:

i. A description of the activities that are to be performed and the expected schedule for the activities.

ii. A confirmation that the activities fall within the authorization provided by this permit, the replacement is or will be in good operating conditions, and the outage of a turbine will not prevent or interfere with compliance with applicable requirements for control of emissions, with supporting information.

iii. Confirmation that the proposed activities do not involve reconstruction of a turbine, with explanation and supporting documentation.

g. The authorization provided by Condition 7.2.11 for each affected turbine will terminate, if the turbine is permanently removed from service or 30 days after notification from the Illinois EPA that this authorization is being terminated, whichever occurs first.

7.2.12 Compliance Procedures

a. Compliance with the emission limitations of Condition 7.2.3(c)(ii) are addressed by the monitoring requirements in Condition 7.2.8 and reporting requirements in Condition 7.2.10.

b. Compliance with the emission limitations of Conditions 5.6.1 and 7.2.6 are addressed by the records required in Condition 7.2.9 and the emission factors and formulas listed below:

Pollutant	Emission Factor (lb/mmscf)
NO_x	0.0654
VOM	0.0002
CO	0.0533

These are the emission factors for derived from the most recent testing conducted May 2002.

Gas Turbine Emissions (lb/mo) = NO_x, VOM or CO emissions = E.F. x Fuel Usage (in mmscf/mo)

Blowdown Emissions

10,000 scf/blowdown x 1.082 lb VOM/mmscf x mmscf/1,000 scf = 10.82 lb VOM/blowdown/turbine

VOM emissions (lb/yr) = 10.82 lb VOM/blowdown per turbine x 75 (number of blowdowns/turbine)

VOM emissions = 811.5 lb VOM/turbine

7.3 Fugitive Losses from Leaking Piping Components

7.3.1 Description

Equipment and pipeline components (i.e., valves, flanges, relief valves, compressor seals, etc.) at the source that have the potential to leak natural gas and as a result VOM emissions being released into an atmosphere.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Fugitive Losses from Leaking Piping Components	Valves, Flanges, Relief Valves, Compressor Seals	N/A	None

7.3.3 Applicable Provisions and Regulations

The “affected leaking piping components” for the purpose of these unit specific conditions, is each leaking pressure relief device, open-ended valve or line, valve, flange or other pipeline connector that is in service at this natural gas pumping station.

7.3.4 Non-Applicability of Regulations of Concern

a. The affected leaking piping components are not subject to the requirements of 35 IAC 215.142 because the natural gas compressors are not used to compress volatile organic liquids.

b. The affected leaking piping components are not subject to the requirements of 35 IAC 215.143 because, pursuant to the definition in 35 IAC 211.2090, the safety relief valves are not capable of causing an excessive release.

c. The affected leaking piping components are not subject to the requirements of 40 CFR 60 Subpart KKK “Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants” because this source is not a “natural gas processing plant”, as defined in 40 CFR 60.631.

7.3.5 Control Requirements and Work Practices

Control requirements are not set for these unit specific emission units. However, there are source-wide requirements in the Standard Permit Conditions in Section 9. There may also be requirements for general source-wide control requirements set forth in Condition 5.5.

7.3.6 Production and Emission Limitations

Production and emission limitations are not set for these unit specific emission units. However, there are general source-wide production and emission limitations set forth in Condition 5.6.

7.3.7 Testing Requirements

Testing requirements are not set for these unit specific emission units. However, there are general testing requirements in Conditions 5.7 and 8.5.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for these unit specific emission units. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for affected leaking piping components to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act:

a. Amount of valves; flanges and screwed fittings; relief valves; and compressor seals;

b. Monthly and annual aggregate VOM emission records from the affected leaking piping components shall be maintained based on operating data and the applicable procedures in Condition 7.3.12, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected leaking piping components with the permit requirements, 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.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for affected leaking piping components. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.3.12 Compliance Procedures

Compliance with the emission limitations of Condition 5.6.1 is addressed by the records required in Condition 7.3.9 and the emission factors and formulas listed below:

	Natural Gas Emissions	VOM Emissions
Piping Component	Lb/hr/component[1]	Lb/hr/component[2]
Valve	0.044	0.0012
Fittings	0.00242	0.0001
Relief Valves	0.414	0.011
Compressor Seals	0.449	0.012

[1] The emission factors for natural gas emissions are the factors found in USEPA guidance document EPA-453/R-93-026.

[2] The emission factors for VOM emissions are the emission factors for natural gas emissions found in the USEPA guidance document EPA-453/R-93-026 and multiplied by the fraction of VOM in Natural Gas (i.e., 0.0265).

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 January 19, 2005 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 if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. 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 Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
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 determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;

e. The test method(s) that 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. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.

b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

iv. USEPA Region 5 - Air Branch

USEPA (A - 18J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

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.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

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, pursuant to Section 39.5(7)(j) and (p) of the Act, 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, or 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 this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [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 there under.

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 as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

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 applicable requirements; 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. At 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 including any logs, plans, procedures, or instructions required to be kept 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, Air Quality Planning 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 Unit, 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 and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 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 [Section 39.5(7)(k) of the Act]:

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.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

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 [Section 39.5(7)(k)(iv) of the Act].

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, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, 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 that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

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 and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) 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. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and 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

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 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: _____

Attachment 2 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 3 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf
www.epa.state.il.us/air/permits/197-fee.pdf